NON-PAPER ON THE IPA III CSF AND MEDIA PROGRAMME 2021-2023 (MULTI-COUNTRY) ACTION DOCUMENT

October 2021

Consultations with and inclusion of CSOs are key for the success of the IPA III CSF and Media Programme, and should be structured, timely, and transparent.

Structured inclusion of CSOs is necessary in all phases of the IPA III process – the preparation, implementation and monitoring of the use of the future IPA III funds. Unfortunately, civil society in the region has noted a worrying lack of opportunities to participate in timely consultations both on national and regional level, as well as limited access to information on the process and the documents prepared. Having in mind the long process of preparation of the IPA, it is necessary to stress the importance of transparency and timely information-sharing throughout the process, which would allow for informed and meaningful contributions from the civil society and all stakeholders.

The EU should continue to firmly support a more enabling environment for civil society development, as a precondition for the existence of a strong and accountable civil society.

The Civil Society Facility (CSF) should support actions aimed to promote all three aspects of the enabling environment for civil society development. Although the focus on freedom of expression in the Action Document is related to the noted deterioration in this area, the document puts significant focus on journalists and media, disregarding the restrictions and challenges faced by CSOs in this area, as well as in other areas. The Action Document shows a notable absence of support for the enabling environment for CSOs, which encompasses not only the basic freedoms, but also CSOs' financial viability and sustainability, as well as cooperation with the public institutions. In addition, although the document stresses the need to strengthen the accountability and transparency of CSOs, the activities proposed would not adequately address this issue. Instead, more direct support to CSOs for improving the practices of transparency and accountability, focusing on self-regulation in this area, is necessary.

The implementation modalities of the IPA III CSF should support the development of capacities of CSOs and local ownership of the processes in the region. Predominantly assigning the management of the facility to international agencies undermines WBT civil society and would be a great obstacle to the overall vision of enhanced regional cooperation.

The IPA III CSF plans only 33 out of the 93 million EUR for the entire region to be implemented via grants to CSOs, while the rest is planned to be implemented through direct contracts with international agencies, UN Bodies, Member states (e.g. GIZ), EED, TACSO, etc.[1] On one hand, based on the experience of CSOs, many of these actors have been undermining public consultations and squeezing out CSOs. On the other hand, this puts the cost-effectiveness of the planned support under question, having in mind that these international agencies often spend a vast proportion of funds for their operational costs, while at the same time core support to CSOs is deprioritized. Such an approach represents a serious setback in the way the EU supports the civil society in the IPA Beneficiaries, as it undermines the CSOs' local knowledge, expertise, long-standing relations with stakeholders, and the possibility to ensure ownership of project outcomes.

The decision not to assign responsibility to WBT governments for the management of EU funds for civil society is not surprising and rather welcome, having in mind the lack of sound, independent and transparent mechanisms for distributing public funds to CSOs. However, since the EU has clearly stated the intention to "institutionalise a transparent and quality-driven process of selecting, financing and monitoring CSO projects at local level", in the long-run, it should also be more invested in supporting national governments to manage their funds consistently and in a clear and transparent manner.

The EU should put a stronger focus on core and long-term support for CSOs rather than short-term project support.

Despite the proclaimed understanding of the importance of operational grants and the positive previous experience with the IPA II in various documents and occasions, the Action Document fails to mention the allocation of any core and long-term support to CSOs. Moreover, the only operating support envisaged is directed to the European Endowment for Democracy (EED), which again shows a lack of understanding of the need for long-term investments in a strong and independent civil society. The document also fails to address the significance of operational grants and more flexible support for enhancing regional cooperation. The importance and value of regional networks and projects has already been confirmed in several findings and reports including the Mid-Term Evaluation of the IPA CSF in 2017[2], or the 2019 TACSO Needs Assessment Report of civil society[3]. Support to regional networks would enable the creation and sustainability of regional platforms for solidarity and collaboration among CSOs, while bringing a new momentum to the post-pandemic cooperation in the region, and going hand in hand with the efforts for regional integration and the creation of the Regional Economic Area.

Regular assessment against the targets set in the Guidelines for EU Support to Civil Society in Enlargement Countries is important for ensuring the effectiveness and impact of the EU support for civil society.

We welcome the fact that the Action Document highlights the Guidelines for EU support to civil society and the Guidelines for EU support to media freedom and media integrity as the internal monitoring mechanisms that will allow for the measurement of progress at IPA III beneficiaries level. Additionally, we also welcome the mention of several CSO reports in the Sources of Data as part of the Logical Framework. However, the document fails to list, within the sources, the only monitoring reports against the Guidelines, which in the past have been prepared by TACSO and BCSDN, as well as BCSDN's Monitoring Matrix Reports[4], recognized by the EC for their value in shadow reporting on the enabling environment for CSDev.

[1] IPA III Civil Society Facility 2021-2013 Multi-Beneficiary [Action Document, pg. 21]
[2] http://www.merc.org.mk/Files/Write/00001/Files/csf_evaluation_report_wbt_dig.pdf
[3] http://tacso.eu/wp-content/uploads/2020/09/Regional-CS-Needs-Assessment-Report-2018-2019-final.pdf
[4] https://monitoringmatrix.net/