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## Comments to the Multi-Country Civil Society Facility and Media Action Document for 2014-2015

With the aim to contribute to further improvement of the programming of the Multi-Country 2014-2015 IPA Civil Society Facility and Media Action Document, BCSDN has prepared concrete comments and recommendations based on the [policy workshop on Aid Modalities for CS support under the new IPA 2014-2020](#) in September 2013, and the [Regional Report](#) under the Monitoring Matrix for Enabling Environment for CSDev. The Action Document can be commended for incorporating the CS Guidelines and aiming at creating result oriented assistance. Therefore, the bellow recommendations give further general and specific recommendations to be used in defining objectives and modalities of support under individual Calls for Proposals.

### Comments to the Multi-Country Action Document 2014-2015

The Action Document should clearly imply that the planned support will also be directed towards the set objective of the Enlargement Strategy 2013-2014 which states: “empowerment of civil society as...an asset in itself, contributing to building more accountable and legitimate states, enhanced social cohesion and more open and deeper democracies”<sup>1</sup>.

The Main Activities as in the current action document (in Comp1) include “improvement of the enabling environment, the relations between civil society and governments, and the capacities of CSOs” through support to regional networks and associations of CSOs and media organizations. However, if looking at the Results that should be achieved, it seems they are aimed only to increase the awareness of the public institutions about the importance of CSOs in improving good governance and their inclusion in decision making process (Comp 1, Result 2). Thus, our **Recommendation** is to either widen the scope of Result 2 or include a separate Result with the aim to support strengthening of CS and government capacities and improvement of the enabling environment. This means not to forget the basics; the initial aim of the IPA CSF was “to support the development of a civil society which is participating actively in the public debate...and has the capacity to influence policy and decision making processes”<sup>2</sup>.

While we understand that the TACSO project is targeting the capacity building of the civil society, and our FPA project – Balkan Civil Society Acquis is already dealing with the enabling environment, we strongly believe that space should be left for further strategic targeted support on this issue (further elaborated below).

### Recommendations for the preparation of the strategic objectives of the individual calls

Following extensive monitoring conducted by BCSDN’s members through the Monitoring Matrix on enabling environment in Enlargement in the enlargement countries and the Regional findings and recommendations prepared in cooperation with ECNL, we would like to urge you to have in mind the following issues that were identified as most crucial for improving the quality of CS involvement and contribution in the reform processes in the enlargement countries:

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<sup>1</sup> [http://ec.europa.eu/enlargement/pdf/key\\_documents/2013/package/strategy\\_paper\\_2013\\_en.pdf](http://ec.europa.eu/enlargement/pdf/key_documents/2013/package/strategy_paper_2013_en.pdf)

<sup>2</sup> [http://ec.europa.eu/enlargement/tenders/support-for-civil-society/civil-society-facility/index\\_en.htm](http://ec.europa.eu/enlargement/tenders/support-for-civil-society/civil-society-facility/index_en.htm)



1. There is a need for EU investment in supporting the capacity of the administration to implement laws but also the capacity of CSOs to understand better the laws, how these affect their operation and monitor their implementation. Specific support should be tailored to increase the understanding among government officials on the standards in the area of enabling framework for CSOs, and specifically those targeting the issue of public participation. In addition, the EU may support possibilities for governments to meet counterparts in the countries in Europe on this topic and receive technical assistance from regional and European expertise when reforming laws, especially new areas of regulation. It will be useful if some of the people2people events are planned in this direction.

2. In line with the Result 3 – CSOs and journalist professional organizations to have diverse and sustainable funding base

The tax framework in all of the enlargement countries is not favourable and should be amended along with improved knowledge, awareness and capacities of both CS and governments in order CS to be able to raise resources from economic activities to further social entrepreneurship, and also to increase opportunities for tax exemptions.

### **Concrete recommendations on the modalities of support**

The bellow recommendations are derived from BCSDN policy workshop on Aid modalities under the new IPA 2014-2020 held in Brussels in September, 2013 where donors, CS representatives, as well as representatives from the EC shared concrete ideas on lessons-learned and possible improvements on modalities of support:

#### **On CSO capacity building**

Despite the continuous training, CSO in the region still have low capacities. The experience shows of the region shows that despite the continuous training of emerging CSOs there are few other things to have in mind for addressing the issue:

Providing smaller grants for which small and local CSOs will be motivated to apply and therefore aim to for higher standards; - Increase the knowledge of EU integration by CSOs; - Improve the approach and the synergy among donors in terms of capacity building of CSOs; - Support for better quality of local trainers and for developing standards for capacity building.

#### **On funding grass-root and informal civic initiatives**

The sub-granting experience in the region shows that in order the re-granting to have real impact it should be always accompanied with appropriate capacity building through special tailored made programmes; the topics for re-granting should not be pre-set in the IPA call. The sector can be made more sustainable through allocating more money for grass root initiatives, bigger grants for a longer period of time, and more flexible funding.

#### **On support to networks**

Organizations experienced with supporting networks have highlighted that it is important there is a long-term support, and supporting the inception phase of a network has a great potential of success and “investment-return”. Support to networks is very effective for capacity building, especially if networks’ own different capacities are combined and through learning by doing; thus the capacity building should not be separated from the other activities. The criteria to support



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network should primarily concentrate on how well it can conceive and carry on an action (an agenda), the quality of the network, rather than its size.

### **On Grant-making**

In Romania a grant-making foundation (FCSD) was established with the support of EC. It has proved that the persistence of strong CSO grant-maker is important because it provides predictability and sustainability for CSOs especially upon country's accession in the EU when: the funds available to CSOs are very limited; no conditionality or monitoring mechanisms exist over democracy issues upon the member states; it is a modus to continue support to issues dealing with human rights, corruption etc. Other donors already trust local CSOs when it comes to grant-making, and EU should start too.

BSt/THA

Skopje, 25<sup>th</sup> June, 2014

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