

Drawing Attention to the Importance of Carrying Out Proper Consultation with CSOs as Key Stakeholders

While we acknowledge organizing a consultation with the civil society is a step forward from our previous concern about the [lack of opportunities for civil society involvement in the planning of the IPA III](#), our concerns this time are of different, but not less serious concern, as the current is contrary to the standards and good practice for public consultation.

Namely, this refers to restricting the participation to a mere 50 CSO representatives; Failure to provide the consultation documents in advance; allowing only a five-day window for feedback, a lack of public availability of the consultation documents and not disclosing the budgetary allocations.

Constructive feedback plays a crucial role in ensuring an effective consultation process. Regrettably, civil society lacks the necessary information and timeframe to adequately prepare and deliver such feedback.

As the EU is pointing to Minimum standards of consultation between CSOs and IPA beneficiary authorities/institutions as per the *EU Guidelines for Support to Civil Society in the Enlargement region 2021-2027 (the Guidelines)*, the EU should be an example to all for inclusive civil society dialogue, keeping accountable to its promise - structured participation of CSOs in policy- and decision-making to be a key priority for the EU.

Supporting more Enabling Environment for Civil Society Development is a Precondition for the Existence of a Strong and Accountable Civil Society

In times of growing constraints to civil society in the enlargement countries, and increased focus of the international community on stability and security due to unsettling geopolitical developments, it is crucial the EU to continue to firmly support a more enabling civil society environment, as a precondition for the existence of a strong civil society that pushes for democracy, human rights, accountable governance, and inclusive sustainable development.

Therefore, it is important that the Civil Society Facility (CSF) supports actions aimed to promote all aspects of the enabling environment for civil society development. In the Action document, there is a notable absence of support for strengthening the civil society involvement and the cooperation with the public institutions. In addition, improving CSOs' financial viability and sustainability is viewed from a very narrow lens limited to funding diversification and CSO engagement in philanthropy, corporate social responsibility, social entrepreneurship. There is a notable lack of reference to the SO 1.7 of the Result Framework of the EU Guidelines "*Public financial and non-financial support to CSOs is available in IPA beneficiaries, and provided in a transparent, accountable, fair and non-discriminatory manner*", despite repeated findings about insufficiently regulated and non-stimulating fiscal and tax treatment of CSOs and **inadequate public funding** in all the IPA III beneficiaries¹.

¹ Monitoring Matrix on Enabling Environment for Civil Society Development – Regional Report: Western Balkans and Turkey 2022, <https://www.balkancsd.net/monitoring-matrix-on-enabling-environment-for-civil-society-development-regional-report-western-balkans-and-turkey-2022/>

In the same direction, the outlined intervention logic in the IPA CSF Action Plan

“If CSO and CSO networks’ engagement opportunities in policy- and decision-making processes are enhanced, CSO financial and organizational sustainability and CSOs’ cross-cutting capacity development and networking opportunities are improved then the civil society sector will be strengthened, and will benefit from a more conducive environment, a strengthened cooperation and partnership between CSOs and public institutions, and reinforced CSO capacity and resilience.”

shows weak alignment to the SO2 of the Guidelines aiming to: *Strengthened cooperation and partnership between CSOs and public institution*, as the unfortunate wording of *“enhancing engagement opportunities in policy – and decision making”* misses an important point about the need to have systematic and meaningful involvement of the civil society in these processes.

In this regard, we think this IPA CSF Action Document needs to demonstrate [stronger commitment by the EU towards more enabling environment for an empowered civil](#) by acknowledging support for CSO actions aimed to keep governments’ and public institutions accountable in treating the civil society as a crucial component of any democratic system.

More Effective, Accountable and Sustainable Support

As a civil society organization, we firmly believe that **direct** support to local civil society organizations from the IPA countries via different types of modalities is the most effective, impactful and sustainable way for appropriately addressing local challenges across all Windows of the IPA III, while at the same time supporting the ownership and sustainability of the actions beyond the project cycle and investing in empowered local civil society.

For this reason, we urge the EC to avoid as much as possible the practice of spending the IPA support, especially the one intended for ***Strengthening the civil society or the civil society involvement***, through technical assistance or direct contracts to international organizations, consultancies, UN Agencies or other types of intermediary institutions. We firmly believe that these types of modalities do not contribute, but often undermine CSOs’ local knowledge, expertise, long-standing relations with stakeholders, and ownership of project outcome.

Any continuation of direct contracts, including the Activities related to Output 1.3 Provision of regional technical assistance to CSOs, should be subjected to positive findings and recommendations of carefully conducted evaluation that involves direct beneficiaries and local communities.

The same applies to any type of contribution agreements planned under IPA CSF with organisations such as UNESCO mentioned only in the *“Summary of the Action”* section in the document, without any further information how such type or support is relevant and will contribute to achieving any of the Specific Objectives or expected Outcomes of the IPA CSF.

Lastly, more detailed information is also missing regarding the Activities related to Output 1.2 *Support to the financial and organisational sustainability of CSOs*, especially when it comes to how these activities are planned to be implemented. This information we consider crucial to be able to provide constructive feedback to an issue that is among the key objectives of [BCSDN Advocacy Platform](#).