



Implementation of the partnership principle of the EU cohesion policy in enlargement countries

Final report

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Acronyms

CLLD	Community-Led Local Development
CPR	Common Provisions Regulation
CSO	Civil Society Organisation
ECCP	European Code of Conduct on Partnership
EGTC	European Grouping of Territorial Cooperation
ERDF	European Regional Development Fund
EU	European Union
IPA	Instrument for Pre-Accession
JS	Joint Secretariat
LAG	Local Action Group
LRA	Local and Regional Authorities
MA	Managing Authority
MC	Monitoring Committee
NA	National Authority
NEXT	Neighbourhood External
NGO	Non-Governmental Organisation
PO	Policy Objective
PTF	Programming Task Force
RAG	Regional Advisory Group
ReLOaD	Regional Programme on Local Democracy
SME	Small and Medium-sized Enterprise
TACSO	EU Technical Assistance to Civil Society Organisations in the Western Balkans and Türkiye
TF	Task Force
TFG	Task Force Group

Executive summary

The study examines the implementation of the partnership principle across nine candidate countries: Albania, Bosnia and Herzegovina, Georgia, Moldova, Montenegro, North Macedonia, Serbia, Türkiye, and Ukraine. The analysis is based on the observation of twelve Interreg programmes - eight cross-border, three transnational, and one interregional - for the 2021–2027 programming period. To ensure a more comprehensive assessment, all Interreg programmes covering the candidate countries were taken into consideration.

The study draws on a combination of documentary analysis, 85 interviews with Interreg programme bodies, stakeholders in the candidate countries, and European Commission desk officers, as well as a dedicated survey targeting civil society organisations, which collected 116 responses.

Application of the partnership principle in the programme preparation phase

The application of the partnership principle in the programming of Interreg programmes covering candidate countries reflects a solid level of formal compliance with EU regulations but variable depth of practical implementation. Under the cohesion policy regulatory framework, a wide and clearly defined range of partners - public authorities at all levels, economic and social partners, civil society organisations (CSOs), and, where appropriate, research bodies and European Groupings of Territorial Cooperation (EGTCs) - must be involved in programme preparation.

The analysis of Programming Committees and Task Forces shows differentiated patterns of participation across programme types and candidate countries. Transnational and interregional programmes generally displayed limited partner involvement, often restricted to national authorities, as in the Danube Region, IPA ADRIAN, and NEXT Black Sea Basin programmes. Conversely, cross-border programmes demonstrated broader inclusion of regional and local actors, economic and social partners, and, in some cases, CSOs.

Consultations organised during the **programming phase** demonstrated generally a commitment to the European Code of Conduct. Cross-border programmes typically used diversified consultation formats - surveys, interviews, and workshops - whereas transnational programmes tended to rely mainly on online instruments. While virtual modalities broadened outreach, they also limited effective participation by smaller organisations facing language and resource constraints.

Consultations were generally anchored in prior territorial analyses, which informed the thematic scope of stakeholder engagement. The process added tangible value to programme design, as feedback often led to adjustments in strategies and priorities. Examples include the introduction of the 'Accessibility' priority in Interreg NEXT Poland–Ukraine, which addressed needs stemming from the 2022 Russian invasion of Ukraine, and the refinement of tourism and cultural priorities in Interreg IPA Greece–Albania. Similarly, in Interreg NEXT Romania–Moldova, stakeholder proposals influenced both strategic and operational aspects of the programme.

National Authorities (NAs) played a pivotal role in disseminating information and mobilising stakeholders. Their mediation proved essential to bridging the gap between the programme level and local actors, as illustrated by Interreg IPA Bulgaria–Türkiye, where NA support ensured bottom-up engagement. Contributions from local authorities and non-public stakeholders, especially CSOs, were most valuable when framed within 'Policy Objective 5 –

A Europe closer to citizens', linking the consultation process to cross-border territorial strategies that provide a framework enabling these actors to maintain their specific focus. Conversely, for transnational programmes, the existence of defined macro-regional objectives provided stakeholders with a strategic framework for their input into programme design, thereby reinforcing the so-called 'embedding' process.

The consultation process also exposed challenges. When overly centralised or limited to general surveys, stakeholder input tended to have low value, particularly in transnational contexts. Delays in the adoption of the regulatory framework and overlapping consultation rounds further strained stakeholder capacity to contribute. Language barriers, differing levels of technical competence, and the underrepresentation of non-public stakeholders (especially youth organisations) were common obstacles. Despite these constraints, programmes such as Bulgaria–Türkiye succeeded in using consultations to address sensitive issues - like border security and migration - demonstrating that the process can add substantive value when properly targeted.

Capacity-building and financial support for CSOs was uneven and insufficient. Most Managing Authorities confined assistance to information-sharing activities and invitations to meetings, with few of them offering sustained capacity-building. Results from a survey distributed to CSOs in all candidate countries (116 respondents), showed good awareness of Interreg programmes and other EU programmes, general satisfaction among those already consulted by the Interreg programmes, and high interest in participating in Monitoring Committees. Most CSOs that had been consulted by the Interreg programmes and had responded to the survey reported having received feedback on their contributions but not being fully informed about how the consultation results were used in the programme design.

While online consultations dominated the 2021-2027 period, CSOs that had experienced them expressed a preference for in-person involvement, perceiving it as more conducive to meaningful dialogue. Non-consulted CSOs also reported strong interest in future participation, though they preferred online formats. Across both groups, there was broad willingness to contribute to focus groups on strengthening civil society's role in EU programmes.

The study confirmed that CSOs can contribute most effectively within the framework of territorial strategies, where their granular understanding of local needs helps to better shape programme objectives. Yet, in many candidate countries, support to CSOs remains ad hoc and heavily dependent on Managing Authorities' initiative. Positive practices include Moldova's training activities and North Macedonia's reimbursement mechanisms for Monitoring Committee participation, but these are not consistently applied.

However, support to CSOs in the candidate countries, and therefore the enhancement of their capacity to contribute to the application of the partnership principle, is not limited to Interreg tools. EU-level technical assistance plays a crucial complementary role. The 'Technical Assistance to Civil Society Organisations' (TACSO) project, managed by DG ENEST, and the 'Regional Programme on Local Democracy' (ReLOaD) jointly implemented with UNDP, provide important regional frameworks for strengthening civil society engagement. While TACSO and ReLOaD do not offer Interreg-specific training or guidance, they build horizontal capacities - such as participatory planning, partnership management, and transparent funding procedures - that are directly relevant for effective participation in Interreg.

Application of the partnership principle in the programme implementation phase

During the implementation phase, the composition and functioning of Monitoring Committees (MCs) broadly reflect the arrangements established during programming. A continuity-based approach prevailed, with members of **Programming Committees** or their institutions typically

transitioning to MCs. This ensured stability but limited opportunities for broader renewal and diversification.

Analysis of all Interreg programmes covering candidate countries shows that Serbia and Ukraine involve all prescribed actor typologies. Ukraine also includes Euroregions formally established in Poland, providing an additional cross-border dimension. North Macedonia and Moldova each involve four types of partners: national authorities, local and regional authorities, and civil society organisations, with social partners represented in North Macedonia and one university participating in Moldova. Türkiye includes national, regional, and civil-society actors. Albania, Bosnia and Herzegovina, and Montenegro engage only public authorities, and Georgia, covered solely by the Black Sea Basin programme, is represented exclusively by national authorities.

While National Authorities are consistently core voting members, non-governmental actors typically hold observer status. The principle of *one vote per country delegation* safeguards national balance but limits the direct influence of sub-national partners. Cross-border programmes display greater partner diversity and stronger governance structures than transnational ones.

The functioning of Monitoring Committees is generally supported by adequate procedures, with agendas and materials distributed in advance and informal preparatory meetings held in some countries. Nevertheless, differences in member capacity and reliance on email exchanges constrain dialogue quality. Technical complexity remains a key barrier to active participation, and evaluation reports are seldom used as learning tools.

By regulation, each Monitoring Committee must adopt rules of procedure ensuring transparency and conflict-of-interest prevention. While all programmes comply formally, implementation gaps persist. The main issue is perceived conflicts of interest among local authorities and CSOs, many of whom fear that participation in Monitoring Committees could jeopardise their eligibility for funding. Although unfounded, such perceptions discourage engagement and weaken multilevel governance.

Survey findings reveal that CSOs familiar with Interreg display greater awareness of conflict-of-interest boundaries and are more open to participating in governance roles. The case of Interreg IPA Bulgaria–North Macedonia demonstrates how these challenges can be managed effectively: local stakeholders involved in designing and implementing a territorial strategy under Policy Objective 5 assumed responsibilities at their own level, reconciling participation with sound governance.

Transparency in member appointment remains not consistent. Structured procedures for selecting Monitoring Committee representatives were not systematically identified, with continuity from previous periods often prevailing. Enhancing openness in appointment processes and further formalising sub-committee structures could contribute to improving accountability and strengthening the application of the partnership principle.

National sub-committees, though not mandated by regulation, can strengthen coordination and multi-level governance. Their establishment remains uneven. The Italian national sub-committee for Interreg IPA South Adriatic illustrates how such mechanisms can enhance alignment among stakeholders, whereas Albania and Montenegro lack similar structures. The absence of formal sub-committees often results in inconsistent national positions within programmes, as these positions do not fully reflect the breadth of stakeholders' interests and expectations. Where in place, even informal consultation networks can help improve coherence among stakeholders at national level, though their limited formalisation restricts transparency and accountability.

Cross-cutting analysis

Persistent structural challenges affect stakeholder engagement beyond the national level. Local and regional authorities, though present in most Monitoring Committees, often face limited administrative capacity, language barriers, and time constraints. Economic and social partners are weakly represented - mostly in Serbia, Montenegro, and Ukraine - and private-sector involvement remains rare. CSOs, despite their recognised role, continue to struggle with resource constraints and uneven definitions that sometimes blur distinctions with state-linked entities. Academic institutions participate selectively, mainly in Moldova, Serbia, and Ukraine, while youth organisations are absent.

The analysis concludes that the partnership principle is widely recognised and embedded in the governance of Interreg programmes covering the candidate countries. However, implementation remains uneven across candidate countries. The identified gaps (e.g. limited capacity of sub-national authorities, weak private sector engagement and insufficient CSO support) reflect institutional deficits that can be improved. The study demonstrates that proactive Managing Authorities and administrative support can substantially improve stakeholder engagement.

Introduction

The overall objective of the study is to support candidate countries in implementing the partnership principle in EU cohesion policy. For this purpose, the study focuses on the Interreg programmes covering candidate countries, assuming that they are valuable exercises in preparing the ground for possible future regional/national mainstream cohesion policy programmes.

The partnership principle is central to EU cohesion policy implementation and represents a key requirement under Chapter 22 of the accession negotiations. Regulation (EU) 2021/1060, Article 8, requires that partnerships include regional, local, urban and other public authorities; economic and social partners; relevant bodies representing civil society; and research organisations and universities where appropriate.

For candidate countries, effective implementation of the partnership principle serves multiple purposes: demonstrating readiness for multi-level governance requirements, building institutional capacity for future cohesion policy management, and ensuring inclusive decision-making processes that reflect EU values and standards.

The study aims to complement the Commission's knowledge on the state of implementation of the partnership principle in the candidate countries and feed into the Commission's analysis of capacities and needs in the context of the accession negotiation process, as well as inform possible future technical assistance and future legal framework aspects. It also aims to increase the knowledge of the candidate countries on how to apply this principle in line with the best practices available in Member States.

The study's findings inform three key policy processes: Chapter 22 accession negotiations, preparation of the post-2027 cohesion policy framework, and design of future technical assistance programmes for candidate countries.

1.1. Scope of the study

The study examines the implementation of the partnership principle across the **nine candidate countries**: Albania, Bosnia and Herzegovina, Georgia, Moldova, Montenegro, North Macedonia, Serbia, Türkiye, and Ukraine. The analysis is based on their participation in twelve Interreg programmes during the 2021-2027 programming period:

Cross-border programmes:

- Interreg IPA Bulgaria-North Macedonia
- Interreg IPA Bulgaria-Türkiye
- Interreg IPA Croatia-Bosnia and Herzegovina-Montenegro
- Interreg IPA Greece-Albania
- Interreg IPA Hungary-Serbia
- Interreg IPA South Adriatic

- Interreg NEXT Poland-Ukraine
- Interreg NEXT Romania-Moldova

Transnational programmes:

- Interreg IPA Adriatic-Ionian
- Interreg VI-B Danube
- Interreg NEXT Black Sea Basin

Interregional programmes:

- URBACT IV

The study covers both the **programming phase** (preparation of programmes) and the **implementation phase** (monitoring committees and programme management), examining how the legal provisions on partnership and multi-level governance have been applied in practice.

To ensure a more comprehensive assessment of participation in the Monitoring Committees, all Interreg programmes covering the candidate countries were taken into consideration, including: Interreg IPA Bulgaria-Serbia, Interreg IPA Croatia-Serbia, Interreg IPA Greece North-Macedonia, Interreg NEXT Hungary-Slovakia-Romania-Ukraine, Interreg EURO MED, Interreg NEXT MED, Interreg Europe.

The study is complemented by 20 good practices illustrating the application of the partnership principle within Interreg programmes. Ten of these refer to the sampled Interreg programmes, while the remaining ten are drawn from other, mainly intra-EU, Interreg programmes.

1.2. Sources and methodology

The materials examined included Interreg programming documents; the composition and minutes of Programming Task Forces; lists of consulted partners; public consultation documents; the composition, reports, and Rules of Procedure of Monitoring Committees; the composition of national sub-committees; amendments to programming documents; programme management and control system documents; and introductory materials on EU programmes and initiatives other than Interreg such as the EU Technical Assistance to Civil Society Organisations in the Western Balkans and Türkiye.

Figure 1: Interviews conducted

Source: own elaboration

Building on this analysis, a structured series of interviews was conducted. For each sampled Interreg programme, the responsible body - either the Managing Authority or the Joint Secretariat - was interviewed on the application of the partnership principle in the relevant candidate country or countries. In addition, national experts conducted interviews, usually in the national language, with stakeholders involved in applying the partnership principle within the Interreg framework, including national authorities, local and regional authorities and their associations, economic and social partners, civil society organisations, and academic institutions.

European Commission desk officers from DG REGIO responsible for Interreg programmes and/or candidate countries were also consulted, along with one DG ENEST desk officer with expertise on civil society support in the candidate countries. In total, 85 interviews were conducted over a six-month period.

To complement the qualitative evidence, a targeted survey was carried out between July and October 2025 to collect the views of civil society organisations across the candidate countries.

The **survey** covered both **civil society organisations** that had been consulted during the Interreg programming phase and a comparative sample of non-consulted organisations identified with the support of national experts. The study team compiled a database of 747 CSOs - 474 consulted and 273 non-consulted - based on desk research, existing databases, and expert input, with particular attention to organisations in cross-border areas. A total of 116 responses were received, corresponding to an overall response rate of 16%.

Documentary evidence, interview findings at the three levels (candidate country, Interreg programmes, and European Commission), and survey data were triangulated and analysed. On this basis, possible actions have been formulated to support the candidate countries in strengthening the application of the partnership principle.

1.3. Limitations and notes of caution

The present study faces methodological constraints, as it draws mainly on desk analysis of programme documents and a set of interviews in the candidate countries. While this provides useful indications, it cannot substitute for a more systematic and comprehensive inquiry into administrative capacities in each candidate country. Moreover, the reliance on Interreg IPA and Interreg NEXT programmes as the primary entry points for the assessment implies that the analysis is anchored in a specific policy perspective, namely that of European Territorial Cooperation. As a result, the findings primarily reflect how the partnership principle is applied within cooperation frameworks that are intrinsically place-based, cross-border, and multi-level. This focus allows for an in-depth examination of participatory dynamics in territorially anchored programmes, but it also means that the analysis could not fully capture partnership practices as they may occur in other policy settings or funding instruments beyond territorial cooperation.

Finally, it should be noted that among the elements of the partnership principle analysed, some depend primarily on the candidate countries (e.g. the setting up of the national sub-committees), while others are more closely linked to the responsibilities of the Managing Authority (e.g. the way consultations are conducted). This division of responsibilities makes the gap assessment a complex and multifaceted exercise.

These limitations do not undermine the study's core findings but establish important parameters for interpreting results and applying recommendations to diverse country contexts and evolving policy environments.

1.4. Structure of the report

The report opens with a section outlining the cohesion policy regulatory framework related to programme governance, including aspects such as partnership composition and the selection of operations under the Interreg programmes on external EU borders. Reference is also made to the proposal for a new regulation.

The core analysis is presented in **Sections 3 and 4**, which constitute the analytical foundation of the study and draw on the triangulated data and information collected during the research. These sections examine the programme preparation phase - covering the composition and functioning of Programming Task Forces, the consultation process, and the support provided to civil society organisations - and the programme implementation phase, focusing on the composition and functioning of Monitoring Committees, national sub-committees, and issues related to transparency and conflict of interest.

Each sub-section refers to the relevant regulatory provisions and analyses the application of the partnership principle, highlighting, where possible, the respective responsibilities of

candidate countries and programme bodies. The interplay between stakeholders in the candidate countries and programme authorities is further illustrated through ten **good practices**, which demonstrate how improvements could be applied across the nine candidate countries and their respective Interreg programmes.

Section 5 presents the conclusions on partner participation throughout the programme lifecycle, highlighting the main gaps identified in the study, particularly regarding the involvement of stakeholders other than National Authorities.

Section 6 proposes a set of actions to strengthen the application of the partnership principle in the candidate countries.

To complement the report, Annex I includes:

- nine fiches presenting the capacity gap assessment for each candidate country;
- the list of the 85 interviews conducted;
- the report on the survey distributed to civil society organisations.

More detailed information on the programmes and candidate countries is provided in Annex II, including:

- the Good Practices Report, organised into four thematic clusters. Each practice includes contextual background, implementation details, results achieved, and guidance on transferability.

2. Regulatory framework

2.1. The partnership principle under Interreg 2021-2027

In the 2021-2027 regulatory framework, the partnership principle is an overarching element of cohesion policy programming and implementation.

Regulation (EU) 2021/1060, laying down common provisions on the European Regional Development Fund (ERDF), prescribes a structured framework for partnership in the implementation of cohesion policy. Among its key elements, the Regulation prescribes detailed provisions on the **composition and mobilisation of the partnership**, reflecting a continued commitment to multi-level governance.

Pursuant to **Article 8** of the Regulation, Member States are required to ensure that the partnership shall include the following categories of stakeholders:

- regional, local, urban and other public authorities,
- economic and social partners,
- relevant bodies representing civil society, such as environmental partners, non-governmental organisations, and bodies responsible for promoting social inclusion, fundamental rights, rights of persons with disabilities, gender equality and non-discrimination,
- research organisations and universities, where appropriate.

For Interreg programmes, the partnership shall include partners from all participating countries. In line with the principle of subsidiarity in the governance of cohesion policy, **Member States shall engage the multi-level partnership** approach not only in the preparation of the **Partnership Agreement**, but also throughout the programming cycle - **covering the design, implementation, monitoring and evaluation** of operational programmes. This engagement is to be ensured, inter alia, through the participation of partners in **Monitoring Committees (MCs)**, which are the core governance bodies overseeing programme performance and strategic direction.

Complementing these provisions, **Regulation (EU) 2021/1059** on specific provisions for the European territorial cooperation goal ('Interreg Regulation'), supported by the ERDF and external financing instruments, sets out tailored rules regarding the application of the partnership principle within the context of Interreg programmes. The 'Interreg Regulation' reiterates the applicability of Article 8 of Regulation (EU) 2021/1060, thus requiring that the categories of partners identified therein be duly represented within the **MCs** of Interreg programmes.

In addition, the Interreg Regulation recognises the unique governance configurations of territorial cooperation. Art. 29 **refers to the involvement of joint bodies** established across the programme area or covering parts thereof - including European Groupings of Territorial Cooperation (EGTCs) - in the partnership structure.

However, this engagement is to be adapted considering the **specificity of Interreg**, particularly considering the **number of participating Member States, third countries and partner countries**. This differentiated approach to MC composition is of **particular significance for transnational and interregional programmes**, where a higher number of

participating entities entails obvious limitations. As the report will further demonstrate, these considerations have direct implications for the mobilisation of the various types of partners in the observed candidate countries and programmes.

The specificity of Interreg is recognised in the regulatory framework also with regard to the selection of operations. Regulation (EU) 2021/1059, which sets out the specific provisions for Interreg programmes, stipulates that operations are to be selected by the Monitoring Committee, with the possibility of establishing one or more dedicated steering committees (Art. 22). Importantly, these steering committees must apply the partnership principle as defined in Article 8 of Regulation (EU) 2021/1060. This arrangement differs from that of regional and national ERDF programmes, where, in accordance with Article 73 of Regulation (EU) 2021/1060, the Managing Authority is responsible for the selection of operations.

2.2. The European Commission's proposal for post-2027 Interreg

The Commission's proposal for the post-2027 period was published on 16 July 2025. The proposal will be negotiated by the Council and the European Parliament, and the text will evolve during this process.

Among the key elements of what changes, the proposal introduces several important novelties. A new **Interreg Plan** will cover Interreg as a whole, providing an overarching framework. The proposal defines general and specific objectives with no thematic concentration. **The Interreg specific objectives now include 'Better cooperation governance,' 'A safer and more secure Europe,' and 'More resilient regions bordering Russia, Belarus and Ukraine.'**

Concerning cooperation with candidate and third countries, new possibilities for cooperation with and between such countries are foreseen.

The draft regulation stipulates that **the Interreg Plan shall promote partnership and knowledge exchange** by specifying which stakeholders have been consulted, how they were selected, how their representativeness has been ensured, and how their input is reflected in the Interreg Plan chapter, in line with the Code of Conduct on Partnership. It shall also include a summary of the consultation process carried out for the preparation of the Interreg Plan chapter. This confirms the **continued focus on the partnership principle within the Interreg framework**.

3. State of play in the implementation of the Partnership Principle in Candidate Countries: Programming phase

3.1. Programming Task Forces composition and role of partners

The regulatory framework (Regulation (EU) 2021/1060, Art. 8; Regulation (EU) 2021/1059, Art. 29) sets out that a wide and clearly defined range of actors - (a) regional, local, urban and other public authorities, (b) economic and social partners, (c) relevant bodies representing civil society, such as environmental partners, non-governmental organisations, and bodies responsible for promoting social inclusion, fundamental rights, rights of persons with disabilities, gender equality and non-discrimination, (d) research organisations and universities, where appropriate, (e) bodies jointly set up in the whole programme area or covering a part thereof, including EGTCs – must be involved in the Interreg programme design process.

From a **programme perspective**, the analysis reveals a clear correlation between programme scale and partner involvement. **Transnational and interregional programmes are characterised by lower levels of partner involvement.** The Interreg Danube Region, Interreg IPA ADRION and Interreg NEXT Black Sea Basin transnational programmes saw participation exclusively by National Authorities, indicating the absence of subnational public administrations and other partner categories.

Interestingly, the URBACT IV interregional programme, covering 36 countries, included in the Programming Task Force the Council of European Municipalities and Regions (CEMR), illustrating how the programme's focus on municipalities enables the identification of the appropriate EU-level umbrella organisation.

In contrast, **cross-border programmes' dimension allows a higher degree of partner involvement across various categories**, though with notable variations. The Interreg IPA South Adriatic, Interreg IPA Croatia-Bosnia and Herzegovina-Montenegro, and Interreg IPA Greece-Albania programmes are characterised by participation of only national and regional/local authorities in the Task Forces. However, the other cross-border programmes examined in the framework of the present study, recorded involvement of economic and social partners, with three cross-border programmes also engaging civil society organisations during the programming phase.

In several cases, the composition of Task Forces or Programming Committees was **informed** by the structure or experience of Monitoring Committees **from the 2014-2020 programming period**, reflecting efforts to capitalise on institutional memory and established governance practices. While this demonstrates progressive **internalisation** of the partnership principle as standard practice, it may also suggest a **path-dependent continuation of previously adopted arrangements**, which limits scope for more inclusive and innovative solutions. In fact, reproduction of past structures and processes could reduce the potential for more ambitious approaches in the implementation of the partnership principle, particularly in relation to multi-level governance.

The figure below shows the composition of the Programming Committees/ Programming Task Forces in the observed programmes.

Figure 2: Programming Committees/ Programming Task Forces composition per programme (sample)

Programme	National Authorities	Local and Regional Authorities	Economic and Social Partners	CSOs	Research Institutions and/or Universities	Euroregions
Interreg VI-A IPA Bulgaria-North Macedonia	✓	✓	✓	✓		
Interreg VI-A IPA Bulgaria-Türkiye	✓	✓	✓	✓	✓	
Interreg VI-A IPA Croatia-Bosnia and Herzegovina-Montenegro	✓	✓				
Interreg VI-A IPA Greece-Albania	✓	✓				
Interreg VI-A IPA Hungary-Serbia	✓	✓	✓			
Interreg VI-A IPA South Adriatic	✓	✓				
Interreg NEXT Poland-Ukraine	✓	✓	✓	✓	✓	✓
Interreg NEXT Romania-Moldova	✓	✓			✓	
Interreg VI-B IPA ADRION	✓					
Interreg VI-B Danube	✓					
Interreg NEXT Black Sea Basin	✓					
URBACT IV	✓	✓				

Source: own elaboration

Among **candidate countries**, based on the observed Interreg programmes, the broadest involvement across different categories of partners within the Programming Committees/ Task Forces was demonstrated by **Ukraine** and **Türkiye**. In these countries all key stakeholder groups were engaged – national, regional and local authorities, economic and social partners, CSOs, research bodies and universities – thus reflecting comprehensive application of the partnership principle.

Such systematic involvement of the types of actors foreseen in the regulatory framework is fundamentally due to the approach of the respective Managing Authorities of the Interreg cross-border programmes covering the candidate countries, namely those anchored in the Polish (for Ukraine) and Bulgarian (for Türkiye) institutional and governmental systems.

However, the effective involvement of the different actors also depends on the institutional, socio-economic, civic and academic landscape in each candidate country. In this regard, Ukraine's performance is particularly noteworthy, considering that its recognition as a candidate country occurred only in June 2024.

At the time of programme preparation, **Ukraine** participated as an EU neighbourhood country, implying a presumptively lower degree of integration into the institutional and procedural framework of EU cohesion policy. The demonstrated ability to apply the partnership principle in such a comprehensive and structured manner under these circumstances is noteworthy. It constitutes a strong indication that this inclusive governance approach is sustained also during the programme implementation phase, which unfolds under the continued impact of the ongoing war of aggression, a context adding further complexity and analytical relevance to the mobilisation of partners in Ukraine.

Looking at the overall picture, it is clear the involvement of economic and social partners, and particularly of CSOs, remains modest and inconsistent across countries. Given the emphasis placed on civil society participation within the EU partnership framework, the fact that **CSOs were engaged in only one-third of the countries concerned** constitutes a significant finding that warrants attention.

However, **candidate countries appear to hold significant, and not yet fully exploited, potential** to create the conditions for the participation of the least represented types of actors in the Programming Committees and Task Forces. This potential lies in **involving umbrella**

bodies capable of representing those entities (cities, social and economic partners, civic actors).

Municipal networks from the two concerned candidate countries participated in the preparation of Interreg IPA Croatia-Bosnia and Herzegovina-Montenegro 2021-2027.

This reflects important developments in local governance across the area concerned. In Montenegro, the involvement of the Union of Municipalities marks a meaningful step forward in the country's ongoing decentralisation efforts since the early 2000s. In contrast, Bosnia and Herzegovina faces a different challenge due to its highly decentralised structure, which often limits the authority of central government institutions. This case is illustrated in the box below.

→ **Good practice: Interreg IPA Croatia-Bosnia and Herzegovina-Montenegro 2021-2027**

The Programme preparation process was fully compliant with Article 8 of the CPR, involving a broad range of relevant partners from Croatia, Bosnia and Herzegovina, and Montenegro. This range of stakeholders comprised regional, local, urban and other public authorities; economic and social partners; relevant bodies representing civil society; and research organisations and universities.

Among these groups, there were also **different umbrella bodies which took part in the consultation process** in 2021, such as Redah (BiH), the Sava River Basin Agency (BiH), the Agency for the Water Area of the Adriatic Sea (BiH), and the Water Association of Montenegro (ME). The Programming Task Force instead included the **Union of Municipalities of Montenegro** as a member, while the Monitoring Committee includes both the Union of Municipalities of Montenegro and the **Association of Municipalities and Cities of Bosnia and Herzegovina**.

The Union of Municipalities (ME) and the Association of Municipalities and Cities (BiH) are national association of local authorities, aiming to develop local democracy and realise common interests of local government units, to improve organisation, work and functioning of the local government, to create conditions for developing various forms of cooperation in all areas of the local community's work, and to cooperate with international organisations and local government unions.

The **participation of an umbrella body representing the Serbian towns and municipality in the design of Interreg IPA Hungary-Serbia 2021-2027** is worth attention. Serbia is featured by a high level of centralisation, where most of the administrative and legal competences and decisions are clustered at the central level, limiting the power and range of actions of local bodies. According to the Congress of Local and Regional Authorities (i.e. an institution of the Council of Europe), the Standing Conference of Towns and Municipalities of Serbia is helpful in supporting the decentralisation process by raising awareness among both the population and local authorities of the importance of strengthening local self-government. The Conference represents a helpful tool for the central government to develop a more effective local self-government and promote capacity-building measures.

According to the EU annual report on the state of regions and cities issued by the European Committee of the Regions in 2024, the EU enlargement policy must involve regions and cities to address the challenges of decentralisation in the Balkan region. In this context, **Interreg plays a crucial role in fostering cooperation initiatives between the EU and candidate countries, while also advocating for issues that reflect the needs of local communities and regions**. The involvement of umbrella organisations will then contribute to more integrated local development and the promotion of EU values among candidate countries. This case is illustrated in the box below.

→ Good practice: Interreg IPA Hungary-Serbia 2021-2027

The Managing Authority has involved Serbian umbrella bodies since the programming phase. The Regional Development Agency of Srem (RRASREM), the Regional Centre for Socio-Economic Development of Banat (RCR BANAT), the Bačka Regional Development Agency, the Regional Development Agency PANONREG and the Standing Conference of Towns and Municipalities were part of the Programming Committee of the Interreg IPA Hungary-Serbia 2021-2027 programme, where they participated in a series of workshops, interviews and online public consultations to generate an active dialogue with them (e.g. identifying local challenges and development needs, concrete actions and project ideas, existing and potential applicants and cooperation networks etc.). Similarly, the contribution of these agencies continued in the implementation phase, where they ensured the highest representativeness of the Serbian population's interests in the matter of cross-border cooperation. The umbrella bodies that serve as members of the Monitoring Committee are the Standing Conference of Towns and Municipalities and the National Association of Touristic Agencies.

The Standing Conference of Towns and Municipalities (Stalna Konferencija Gradova i Opština - SKGO/SCTM) is an association of towns and municipalities founded in 1953 in Serbia, continuing the legacy of the Union of the Towns of Yugoslavia established in 1927. The SCTM aims to develop a system of local self-government that allows citizens to fully exercise their rights to local governance and ensures the efficient, effective, and sustainable delivery of local services to residents and businesses. The SCTM implements a large number of programmes and projects funded by international governmental and non-governmental institutions and organisations. Over the past years, they have implemented more than thirty different projects.

3.2. Approaches to stakeholder involvement through workshops and consultations

According to Commission Delegated Regulation (EU) No 240/2014 - the Code of Conduct on Partnership in the framework of the European Structural and Investment Funds - candidate countries and Managing Authorities are required to consult partners relevant to Interreg programmes on both the process and timetable for programme preparation, ensuring their transparent and effective involvement. Throughout this process, partners should be kept fully informed about the content of the programmes and any subsequent amendments.

The consultation should be organised in a manner that guarantees meaningful participation and accountability. This entails the timely disclosure of, and easy access to, all relevant information, as well as providing sufficient time for partners to analyse and comment on the key preparatory documents, including the draft programmes. It also requires the establishment of clear and accessible channels through which partners can ask questions, submit contributions, and be informed of how their inputs have been considered. Finally, the results of the consultation should be disseminated broadly, ensuring transparency and shared understanding among all actors involved.

The consultation mechanisms employed during the programming phase demonstrate varying levels of quality and effectiveness across programmes and countries. All programmes demonstrated solid reflection on provisions set out in Article 8 of Regulation (EU) 2021/1060, indicating clear awareness of requirements and conscious effort to apply the partnership principle. However, some variations were observed in the extent to which all categories of stakeholders were effectively involved.

Cross-border programmes generally employed **more diverse and intensive consultation approaches**, including surveys, interviews, in-person meetings, and thematic sessions. On the other hand, **transnational programmes** mainly relied on **online tools**, enabling broad outreach but potentially limiting involvement from stakeholders less familiar with EU terminology and procedures.

The pandemic period necessitated a **shift to online consultation formats**, which proved effective and, in many cases, increased stakeholder involvement due to ease of access. However, this created **unintended barriers** for smaller and more peripheral organisations, particularly those facing language constraints, unfamiliarity with EU procedures, or limited human resources and administrative capacity. According to the survey of CSOs, online consultations were considered effective during the pandemic and post-pandemic periods; however, in-person consultations remain preferred by the CSOs that were consulted by the programmes, as they are viewed as more conducive to constructive dialogue, interactive discussions, and building trust with programme authorities.

In most cases, **public authorities remained the most actively engaged group**, contributing through surveys, structured feedback, and participation in online conferences and webinars. The participation of socio-economic partners and CSOs was significantly more limited, reflecting persistent challenges in mobilising non-public stakeholders.

All three **transnational programmes analysed are linked to macro-regional or basin strategies**, namely, the EU Strategy for the Adriatic and Ionian Region (EUSAIR) and the EU Strategy for the Danube Region (EUSDR), as well as the Common Maritime Agenda for the Black Sea.

The existing connection facilitated the involvement of National Authority representatives already engaged in the implementation of macro-regional strategies, particularly in the case of transnational programmes, which are required to take their macro-regional dimension into account. This connection, however, did not necessarily broaden participation to other categories of partners, especially at the sub-national level. Nevertheless, the involvement of stakeholders already active within macro-regional strategy structures strengthened alignment with the macro-regional dimension and contributed to broader cross-sectoral representation.

The capacity to engage stakeholders at the appropriate level and to explore relevant aspects should be attributed to the Managing Authority, even though the quality of the contributions collected largely depends on the maturity and proactiveness of stakeholders in the candidate countries.

Evidence from the consultation process carried out under the Interreg IPA Adriatic-Ionian 2021-2027 programme (geographically corresponding to the EUSAIR) suggests a positive interplay between participation in a macro-regional strategy and the contribution of national stakeholders to Interreg programme design. The existence of defined macro-regional objectives provides stakeholders with a strategic framework for their input into programme design, thus reinforcing the so-called 'embedding' process. Beyond providing a strategic framework, macro-regional strategies like EUSAIR offer a valuable operational advantage. EUSAIR's well-established and organized structure – both vertically across governance levels and horizontally across thematic areas – provides access to networks of entities already experienced in consultation processes and organized around specific thematic clusters (pillars). This structural advantage benefits Interreg programmes significantly, allowing to leverage stakeholder networks. The case is illustrated in the box below.

→ **Good practice: Interreg IPA Adriatic-Ionian 2021-2027**

The EUSAIR is one of the four EU macro-regional strategies, along with the EU Strategy for the Baltic Sea Region (2009), the EU Strategy for the Danube Region (2011) and the EU Strategy for the Alpine Region (2016). The general objective of EUSAIR is to promote economic and social prosperity and growth in the region by improving its attractiveness, competitiveness and connectivity.

The intersection between EUSAIR and IPA ADRION is evident in the Interreg programme documents (2021-2027 and 2014-2020) and has been ongoing since 2014, when both were launched. With regard to ISO1 ('A Better Cooperation Governance'), **part of the consultations focused on addressing EUSAIR macro-regional stakeholders**. Accordingly, in 2021 the MA of the Programme conducted a survey addressing 360 institutions and the EUSAIR Thematic Steering Groups, bodies composed of appointed representatives from participating countries.

Considering also that the pillars of EUSAIR and the priorities of Interreg IPA ADRION are strongly aligned, the programme collected information on identified flagship projects based on the outcomes of the thematic clusters network, ensuring the exchange of views and opinions on thematic and technical topics. The involvement of various stakeholders was also ensured through regular contacts with the EUSAIR Governing Board, thereby strengthening the dialogue within the area.

One member of the EUSAIR Facility Point team participated in the Programming Task Force for the preparation of the Interreg IPA ADRION programme 2021-2027. Similarly, the 2021-2027 Interreg Programme facilitated the creation of the **EUSAIR Stakeholders Platform** to enhance stakeholder involvement and engagement, as well as establish a network of Managing Authorities.

According to the regulatory framework, the consultation process is conceived as a key instrument for improving the relevance and quality of programme design. Consultations should enable a more granular understanding of territorial needs, intervention priorities, and the most appropriate allocation of available resources. In this sense, consultations are expected to contribute directly to ensuring that programmes are better tailored to the specific development challenges of the territories concerned.

Overall, the process was consistently **anchored in a prior territorial analysis**, which served as the basis for defining both the thematic scope and the structure of stakeholder involvement activities. Evidence indicates that **the consultation processes generated added value for programme design**, with several authorities and partners reporting that stakeholder feedback led to tangible adjustments in strategic orientations and implementation measures.

In some cases, the consultations allowed to identify topics that enriched the scope of the Interreg programme, so making it more adherent to the territorial needs.

The case of the **Interreg NEXT Poland-Ukraine** programme is particularly noteworthy. As a result of consultations on the Ukrainian side, an additional priority area, 'Accessibility', was introduced to address societal needs arising from the war and to support recovery efforts. Even if this happened in unprecedented circumstances and critical needs, it represents a fundamental programme adaptation that would not have occurred without direct stakeholder influence.

The **Interreg IPA Greece-Albania** programme incorporated priorities on sustainable tourism and culture based on partner input, helping to reduce fragmentation and enhance programme coherence. This adjustment demonstrated how stakeholder feedback could improve both thematic focus and strategic alignment. Similarly, in the **Interreg NEXT Romania-Moldova** programme, partner feedback ranged from major strategic aspects to technical details, covering priority areas, budget allocation, strategy and methodology. The Moldovan side successfully contributed to programmes across multiple initiatives – in **Interreg VI-B Danube** and **Interreg NEXT Black Sea Basin**, several proposals from Moldovan stakeholders were incorporated, including priority areas such as biosphere protection, ideas on additional funding sources and suggestions for new types of partners.

NAs played a pivotal role in the consultation processes. They were instrumental in disseminating information, encouraging stakeholder involvement, and ensuring alignment with national priorities. Their role proved essential in bridging the gap between the programme level and the wider stakeholder base, as demonstrated by the case of Interreg IPA Bulgaria–Türkiye, which relied on NA support to sustain bottom-up engagement.

Within this framework, **contributions from local authorities, socio-economic partners and CSOs proved more valuable** when they focused on advocating for **specific projects of strategic relevance to their communities**. Such a dynamic was facilitated when **Policy Objective 5** ‘A Europe closer to citizens by fostering the sustainable and integrated development of all types of territories and local initiatives’ was selected, that is, when the cooperation programme was anchored in territorial strategies, particularly those of a cross-border dimension. This emerged from the experience of **Interreg IPA Bulgaria-North Macedonia**, where participants clearly aligned on the importance of addressing local needs under Policy Objective 5, which reinforced the validity of the territorial analysis. In all Interreg IPA programmes managed by Bulgaria (Bulgaria-North Macedonia, Bulgaria-Serbia, Bulgaria-Türkiye), Policy Objective 5 was applied, demonstrating that **opting for a territorial approach can significantly enhance the involvement of local stakeholders**. It is worth noting that among the 21 Interreg, Interreg IPA, and Interreg NEXT programmes covering the candidate countries, only three - those managed by Bulgarian authorities - have selected Policy Objective 5. This finding suggests that developing territorial strategies within the Interreg framework is still perceived as a challenging task¹.

It is also worth noting that, in the case of the **Interreg IPA Bulgaria–Türkiye Programme**, managed by the same Bulgarian authority, the consultation process brought to light issues of strategic relevance for the cooperation area, particularly those related to **external border management**. During the consultation, participants raised the topic of security and the ongoing migration pressure in the cross-border region. They acknowledged the need for coordinated efforts to strengthen the institutional capacity of authorities on both sides of the border in addressing inland-detected irregular migration. As a result, **the Interreg-specific objective ‘A safer and more secure Europe’ was selected**, leading to the establishment of a programme priority focused on enhancing cross-border law enforcement cooperation. This includes joint training, exchanges of experience and good practices, study visits, targeted urban and suburban security measures, and the provision of specialised equipment to reinforce technical and operational capacities.

This case illustrates how **the consultation process can effectively add value to programme design by integrating sensitive and often under-addressed topics**, as further detailed in the box below.

¹ To explore an advanced case of Policy Objective 5 implementation within Interreg, the good practice of Interreg Italy–Austria, which illustrates the financing of cross-border CLLD, can be consulted.

→ Good practice: Interreg IPA Bulgaria-Türkiye 2021-2027

The programming phase of the Interreg IPA Bulgaria-Türkiye 2021-2027 programme was characterised by a long process of regional consultations. These were designed to capture the stakeholders' vision on the challenges and needs of the cross-border area, to agree on the strategic prioritisation of the policy and specific objectives and to engage them in the definition of the results. The main outcomes of these consultations pointed out that PO5 is the **most suitable framework** for the implementation of integrated measures that could contribute to solving common and diverse challenges in the border region.

The MA/JS created a Task Force for the elaboration of a Territorial Strategy, establishing a bottom-up approach that integrated comments from relevant stakeholders, information from databases, positions from experts, etc. Special attention was given in the PO5, since the MA, together with the Task Force, had to deal with the Priority with the highest budget share targeting specific groups, such as the **local population, administration, NGOs, R&D, academic, training, and social institutions and SME**.

Thanks to its multi-thematic focus, PO5 represents the most compelling factor for stakeholders to overcome the developed/underdeveloped dichotomy in the policy approaches to territorial development and to further strengthen the cohesion of the CBC region. According to the Programme document, PO5 promotes 'wise use of scarce resources' through multi-sectoral interventions.

The examples provided above illustrate the effectiveness of a targeted approach to consultations. Conversely, **the consultation process revealed certain limitations when a centralised approach prevailed** and surveys addressing the programme in only broad terms were distributed. As noted in the previous section, such an approach risked diluting the effectiveness of the consultation process, particularly in the case of transnational programmes. However, **this limitation was mitigated when consultations were appropriately embedded within the macro-regional framework**, which provided a coherent basis for developing topics of genuine transnational relevance.

In parallel, a delicate issue emerged. The preparation of the 2021–2027 programmes began with stakeholder exchanges as early as autumn 2019, while the regulatory framework was not approved until June 2021. This temporal misalignment – partly a consequence of the pandemic and its impact on EU-level priorities and the legislative process – meant that substantial input had already been gathered from stakeholders before the final rules were in place. Consequently, certain requirements, such as the obligation to concentrate resources on Policy Objective 2, 'A Greener Europe', and to allocate funding to predefined intervention fields in support of climate change and environmental objectives, had to be incorporated at a later stage. **These top-down provisions**, introduced after a substantial portion of the programming work had already been undertaken, **risked weakening the perceived robustness of a process** otherwise grounded in a bottom-up and multilevel governance approach.

In retrospect, **programme authorities acknowledged that, in the absence of pandemic-related constraints, a broader application of decentralised methods could have further enhanced participation and inclusiveness** across different territorial levels.

As previously illustrated, challenges related to **language** and **accessibility** also emerged as significant barriers for categories of partners other than those at the central level, particularly in larger and more heterogeneous programme areas. Several Managing Authorities noted that

digital literacy and linguistic diversity limited the reach and effectiveness of consultation efforts, underscoring the **need for more tailored communication tools in future cycles**.

Furthermore, **the consultations revealed some imbalances**. Institutional actors were consistently more active, whereas participation from youth organisations, smaller NGOs, and informal networks remained limited – even in cases where these groups were directly relevant to the programme themes. As noted in multiple responses, youth organisations were rarely represented, and even when identified, their capacity for sustained involvement was often low. A potential to be explored in this regard was also confirmed by the survey of non-consulted CSOs, many of which indicated that they could have contributed to the programme's design if they had been consulted (69%). When asked which topics they would have raised, one of the most frequently mentioned themes was youth participation and engagement (e.g. volunteering, youth work, and youth participation,).

The degree to which **feedback loops** were communicated back to stakeholders varied significantly. The Managing Authority of Interreg NEXT Romania-Moldova reported that documents revised after each consultation stage – such as the Territorial Analysis and the Programme Draft – were made publicly available on programme websites and widely disseminated via social media and e-newsletters. However, this good practice was not adopted consistently across programmes. In this regard, the survey of CSOs consulted by the programmes revealed that programmes generally show a good level of responsiveness when CSOs submit proposals or raise questions, as confirmed by 64% of respondents. Conversely, when asked whether they were informed about how consultation results were used to improve programme design, 62% answered negatively, indicating that while the consultation process was perceived as responsive, transparency regarding follow-up actions could be strengthened.

The analysis indicates that coordination with external platforms such as **TESIM, Interact** and **macro-regional strategy bodies** contributed to enhancing quality and coherence of consultation processes. Their involvement supported technical alignment and facilitated broader strategic integration, both in transnational (e.g. support offered by TESIM to Interreg NEXT Black Sea Basin) and cross-border (e.g. support offered by Interact to Interreg IPA Bulgaria-Türkiye) programmes.

Finally, **multiple overlapping consultation rounds across different programmes reduced stakeholder engagement capacity**. In some cases, consultations were conducted simultaneously for programme closure (2014-2020), preparation (2021-2027) and preliminary reflections for post-2027 frameworks, creating **consultation fatigue**. In contrast, the country covered by a single Interreg instrument (Georgia through Interreg NEXT Black Sea Basin) showed more focused and consistent stakeholder participation, suggesting greater willingness to engage in programme design.

3.3. Support to CSOs

The central role of civic and civil society engagement in shaping policies, programmes, and institutions is widely acknowledged. Such engagement constitutes an essential element of democratic governance rather than an optional complement. Constructive relations between citizens, civil society, and public authorities are fundamental to fostering trust, inclusion, and transparency, while contributing to more informed decision-making, greater efficiency, and improved policy effectiveness.

Such an approach is fully embedded in the regulatory framework of cohesion policy programmes. Among the relevant partners for programmes, the bodies representing civil society - such as environmental partners, non-governmental organisations, and bodies responsible for promoting social inclusion, gender equality, and non-discrimination - are identified as key actors. However, not all relevant CSOs possess the capacity, experience, or awareness required to participate effectively in programme preparation, particularly in the candidate countries. This raises the question of how their capacity could be further supported and strengthened.

The provision of support to enhance CSO and social partner participation reveals significant gaps across programmes and countries. Across the programmes, **support to CSOs was limited in scope and primarily aimed at facilitating participation**, rather than at strengthening their **institutional capacity** or enabling a more substantive role in the **design phase** of the programmes. The survey addressing non-consulted CSOs also confirmed this need for capacity building and technical support for organizations, suggesting that these CSOs are aware of such challenges even before becoming involved in programme implementation.

While efforts were made to include CSOs in consultation processes, the limited and ad hoc nature of support reduced their ability to evolve into more influential actors in shaping programme strategies. Most programmes provided basic information dissemination and meeting participation opportunities, but few offered substantive capacity-building or financial support for meaningful engagement. Thus, across analysed cases, there seemed to be no structure support mechanism – such as funding contributions, sustained capacity building or formal coordination structure – to empower CSOs beyond their presence at meetings or consultations. While a few MAs (e.g. Interreg IPA Bulgaria–North Macedonia and Bulgaria–Türkiye) organised **educational webinars** as part of public consultation campaigns, these efforts were largely oriented toward **information-sharing**, not long-term empowerment. Furthermore, no financial allocations or selection mechanisms were detailed for the inclusion of CSOs, and unmet needs such as the lack of training, network coordination, or facilitation of access to decision-making were implicitly acknowledged.

It is important to highlight an issue concerning the definition of CSO provided by some of the analysed candidate countries (mainly Serbia and Türkiye). Considering the case of the Interreg VI-B Danube 2021-2027 programme, Serbia reported consulting ‘Bodies in the fields of civil society, environment, social inclusion, gender equality or non-discrimination’ in the programming phase (as stated in the documents provided by the MA). These entities were then reported in the Interreg VI-B Danube 2021-2027 Interreg programme document as ‘bodies representing civil society’. However, when examining these bodies, it became evident that some are private enterprises, consulting firms, or even agencies funded by the state. For this reason, defining them as ‘bodies representing civil society’ could be misleading. This problem was reported by several MAs during the interviews led by the study team.

Most of the consulted Managing Authorities reported that CSOs tend to perceive themselves primarily as beneficiaries rather than as co-designers or co-decision-makers of the Interreg programmes. Their focus is mainly on developing initiatives and projects in support of their target groups, rather than on participating at a higher strategic level. The consultation of Managing Authorities and stakeholders in the candidate countries indicated that the **technical aspects** of programme preparation and management tend to **discourage CSOs from making a proactive contribution**².

In preparing the study, this perspective was triangulated with **data collected directly from CSOs in the candidate countries**. Both CSOs that had been consulted during Interreg programme preparation and those that had not were surveyed.

The feedback received from the 116 respondents indicates an **overall good level of awareness of Interreg programmes** - including among non-consulted CSOs - as well as of other EU programmes and initiatives. Consulted CSOs expressed **general satisfaction with the consultation process**.

Interestingly, CSOs previously consulted demonstrated a stronger preference for in-person consultations, suggesting a more developed understanding of how constructive dialogue with programme bodies can take place. Across both groups, there was strong interest in participating in online focus groups aimed at collecting ideas on how to strengthen the role of civil society organisations in the design and implementation of EU programmes. This interest provides a solid basis for future capacity-building actions.

The dataset, response rate, and main findings from the survey are illustrated in the box below.

² The study published by Interact in 2024 *Civic and civil society engagement in Interreg* reaches the same conclusion (p. 18): "...programmes acknowledge the fact that for many CSOs the primary focus must be on their core functions, as opposed to extending their reach to wider regions or cross-border initiatives. The result is that invitations to participate in programme committees are not necessarily accepted, or there is an imbalance in participation."

Survey Findings on Civil Society Organisations (CSOs) in candidate countries

A dataset of **747 civil society organisations** (CSOs) established in the nine candidate countries was compiled, including 474 that had been consulted by Interreg programmes and 273 that had not. **A total of 116 responses were received**, corresponding to an overall **response rate of 16%**. Notably, the response rate was higher among non-consulted CSOs (28%) than among those that had participated in consultations (8%).

Among the **consulted CSOs**, the response rate was satisfactory (20% or above) in Georgia, Moldova, and Türkiye. **Albania** and **Bosnia and Herzegovina** each recorded a 19% response rate, while it was low in the remaining four candidate countries, with no responses from Serbia and Ukraine. Consulted CSOs generally expressed satisfaction with the consultation process. However, most reported that they had not been informed about how their contributions were used to improve programme design. They also indicated that they do not have access to independent evaluation reports and are rarely involved in evaluative workshops. A majority expressed interest in becoming members of Monitoring Committees, while acknowledging the potential risk of conflicts of interest. In addition, 72% of consulted CSOs reported being aware of other EU programmes and initiatives. The survey shows that programme communication activities focus mainly on promoting content and funding opportunities for beneficiaries. However, less attention is given to communicating the financial and physical progress of programmes. Most consulted CSOs indicated that they had been engaged through online consultations during the 2021–2027 programming period, though they would prefer face-to-face formats in the future. Organisations that had experienced online consultations appear to recognise the advantages of in-person exchanges for dialogue and mutual understanding.

Non-consulted CSOs stated that they could have contributed meaningfully to the programme if they had been invited to participate. Nevertheless, most reported being informed about the programme's content and opportunities. A majority expressed interest in joining Monitoring Committees, and only a few perceived a potential risk of conflicts of interest. Unlike consulted CSOs, most non-consulted organisations would prefer online consultations. Moreover, 63% of non-consulted CSOs indicated awareness of other EU programmes and initiatives.

Across both groups, a large majority of organisations expressed interest in participating in online focus groups aimed at collecting ideas on how to strengthen the role of civil society organisations in the design and implementation of EU programmes.

The consultation of stakeholders in the candidate countries, triangulated with feedback received from DG ENEST, indicated that the framework of a territorial strategy is particularly conducive to enable CSOs to contribute effectively. Interviews suggested that CSOs face structural and capacity constraints which limit their role in programme governance or project selection. With reference to the specific framework of 'IPA–IPA programmes (i.e. cross-border cooperation programmes between candidate countries), DG ENEST highlighted that in the absence of adequate administrative structures, transparent public financing systems and umbrella organisations allowing CSOs to speak with a unified voice, their involvement in formal decision-making remains constrained. Also, when activated at the broader programme level, CSOs are often asked to engage with highly technical, cross-sectoral and administratively complex processes which fall outside their core competence.

Within a territorial strategy, however, CSOs can maintain their specific thematic focus while providing added value through their granular knowledge of local contexts, target groups and their needs. This strategic framing mitigates capacity gaps by positioning CSOs where their

contribution is highest. The local dimension inherent to the territorial strategies can facilitate outreach to CSOs operating in the targeted area, not only allowing them to maintain their specific thematic focus but also enabling a bottom-up process that collects local inputs and channels them effectively to the strategy level.

Even if limited and not consistent among programmes and countries, some positive elements concerning the support offered to the CSOs emerged in the preparation of the study.

Moldova's National Working Group has provided training and information-sharing activities; however, in the absence of dedicated financial resources, smaller CSOs struggle to participate regularly. In Interreg IPA Bulgaria-North Macedonia, Technical Assistance budget allows to cover logistics and per diems for members of the Monitoring Committee. Nonetheless, such measures are not applied consistently across all Interreg programmes covering the country. This suggests that **practices supporting CSO participation largely depend on the approach adopted by the respective Managing Authorities, with significant room for improvements.**

This appears to be **an area in which candidate countries require consistently designed and well-structured support.** The need is particularly evident in the case of transnational programmes, where a larger number of countries are involved and coordination becomes more complex. In this regard, **the role of EU-level technical assistance - such as the support provided by TESIM - proves highly valuable.** This is exemplified by the experience observed in the framework of the Interreg NEXT Black Sea Basin Programme, as illustrated in the box below.

→ Good practice: Interreg NEXT Black Sea Basin 2021-2027

TESIM is a technical assistance project which provides support and guidance to the implementation and management of the **seven Interreg NEXT programmes**, as well as to the closure of the **fifteen ENI CBC programmes**. The efficient use of TESIM in support of NEXT Black Sea Basin 2021-2027 was identified as a good practice.

The use of TESIM by Interreg NEXT Black Sea Basin 2021-2027 began from the very start of the programme preparation process, which commenced in December 2019 with the nomination by participating countries of Joint Programming Committee representatives. More specifically, TESIM supported the set-up of the National Working Groups in each partner country, organising a series of events during the 2020 spring. According to the Programme document, TESIM also assisted in the development of the **territorial analysis**, including the SWOT analysis for each PO and ISO.

In this regard, the **capacity building support** provided by TESIM included the organisation of workshops, thematic meetings, info days, and partner search events, covering topics such as programme priorities, communication, reporting, and digital tools. TESIM experts put in place several means to include **every kind of partners**, such as a mix of in-person and online events, direct meetings, written communication, and the use of digital tools, providing assistance to overcome linguistic barriers as well.

The main role played by TESIM concerned the design of training and feedback sessions, especially in **Georgia**, where its role was quite remarkable. Georgian social partners and civil society organisations received support from the national authority, in cooperation with the Managing Authority and TESIM. This support covered different areas (i.e., **dedicated workshops, training sessions, coordination and networking structures, and contributions to the cost of participating in meetings**) and aimed to enhance the capacity of these organisations throughout the programme's preparation, implementation, monitoring, and evaluation stages.

Since 2009, the European Commission (DG ENEST) has been providing Technical Assistance to Civil Society Organisations (TACSO) in the Western Balkans and Türkiye³. The project aims to enhance the capacities of civil society organisations (CSOs) and to strengthen their role in democratic processes across the region. Through this support, CSOs are encouraged to take an active part in public life while benefiting from a more enabling environment for civil society and pluralistic media development. TACSO forms part of the Civil Society Facility (CSF), an EU mechanism designed to support CSOs in countries that are not yet members of the European Union. Recognising CSOs as key actors in their countries' accession processes, the European Union promotes their participation in public debate and their contribution to shaping policies and decision-making.

Additionally, since 2017, the European Commission and UNDP have jointly supported local communities across the Western Balkans through the Regional Programme on Local Democracy (ReLOaD), now in its third phase (ReLOaD3⁴). ReLOaD3 expects to achieve the following results in at least 50 local governments in the Western Balkans:

³ <https://tacso.eu/>

⁴ <https://www.undp.org/montenegro/projects/reload3>

- An enabling policy environment and stakeholder network are established to facilitate the vertical and horizontal scaling up of transparent funding disbursement mechanisms and more systemic support to CSOs at local and higher levels of government.
- Capacities of local governments and CSOs for effective dialogue and implementation of local grant schemes and delivery of municipal services, are enhanced.
- Local authorities, civil society, and citizens, with a focus on youth and women are supported to spur greater civic engagement in local policy design, delivery and monitoring.
- Stronger partnerships among authorities and civil society and increased civil oversight of public policies across the Western Balkans, through regional networking and the introduction of digital tools are enhanced.

None of these instruments is designed to explicitly target Interreg stakeholders. However, overlaps may occur, particularly among municipalities, local development agencies, and more established CSOs. Such overlaps are largely incidental.

While TACSO and ReLOaD do not provide Interreg-specific training or guidance, the capacities they develop, such as participatory planning, partnership management and transparent funding procedures, constitute horizontal and transferable skills which are directly relevant for effective participation in Interreg. In this sense, both instruments can be understood as indirect enablers.

The European Commission is working in coordination with the European Economic and Social Committee (EESC) to create favourable conditions for greater participation of CSOs from the candidate countries through the EESC Western Balkans Civil Society Forum.

In this dynamic multilateral framework, it must be noted that recent developments in U.S. foreign aid policy have raised significant concerns among CSOs in EU candidate countries. The substantial reduction in funding from the U.S. Agency for International Development (USAID), including a reported 90% cut in foreign aid contracts, has disrupted numerous programmes supporting democracy, governance, and civil society across Eastern Europe and the Western Balkans. Although the EU is not expected to offset the loss of U.S. funding, this situation presents an opportunity for the EU to reinforce its commitment to supporting civil society in candidate countries, potentially enhancing trust and cooperation with local actors.

4. State of play in the implementation of the Partnership Principle in Candidate Countries: Implementation phase

4.1. Monitoring Committee composition and partner role

The regulatory framework (Regulation (EU) 2021/1060, Art. 8; Regulation (EU) 2021/1059, Art. 29) sets out that a wide and clearly defined range of actors - (a) regional, local, urban and other public authorities, (b) economic and social partners, (c) relevant bodies representing civil society, such as environmental partners, non-governmental organisations, and bodies responsible for promoting social inclusion, fundamental rights, rights of persons with disabilities, gender equality and non-discrimination, (d) research organisations and universities, where appropriate, (e) bodies jointly set up in the whole programme area or covering a part thereof, including EGTCs – must be involved in the Interreg programme implementation process.

As the range of actors involved in implementation remains the same as in the design process, **a continuity-based logic** was often observed **in the transition** from Programming Committees and Task Forces to Monitoring Committees. Members of the Programming Committees, or their respective institutions, typically became members of the Monitoring Committees, with only minor adjustments to reflect formal voting roles or to broaden participation.

In the case of Interreg NEXT Poland-Ukraine, most Joint Programming Committee members transitioned to the MC, with a **rotation-based system** introduced to manage representativeness and avoid duplication. In some instances, broader representation was introduced at the Monitoring Committee stage – for example, in Interreg IPA Croatia-Bosnia and Herzegovina-Montenegro, the Monitoring Committee was expanded to include regional and local authorities and the Union of Municipalities of Montenegro.

The observation of the sampled Interreg programmes indicates that **the coverage of partner typologies prescribed by regulatory frameworks for Monitoring Committees substantially mirrors what was observed during the Programming Committee phase.**

A comprehensive analysis of all members of the Monitoring Committees was carried out, covering voting and non-voting members as well as substitutes.

To provide a more comprehensive and robust picture of the typology of partners involved in the implementation of Interreg programmes, the study team decided to go beyond the initial sample of programmes indicated in the Terms of Reference. In agreement with DG REGIO, the analysis of MC composition was extended to include *all* Interreg and Interreg IPA programmes covering the candidate countries. This broader scope allowed for a more in-depth understanding of stakeholder involvement dynamics and capture a fuller range of experiences, ensuring that the findings more accurately reflect the context of partnership principle application in candidate countries.

This approach was adopted following observations made during data collection in the candidate countries, where an incremental approach proved meaningful. Including a broad

range of bodies and organisations in the co-management process of Interreg programmes appears to contribute to a progressively stronger application of the partnership principle.

The analysis shows that **all prescribed typologies of actors are represented in Serbia and Ukraine**. This outcome is more expected in the case of Serbia, a country that has followed a long path towards accession and is covered by several Interreg IPA programmes, whereas it is more remarkable for a new candidate country such as Ukraine. **Moreover, in Ukraine, Euroregions** formally established in the cross-border Member State Poland **are also involved in a Monitoring Committee**⁵ (as a sixth typology of actors), in line with the provisions of the Interreg regulation.

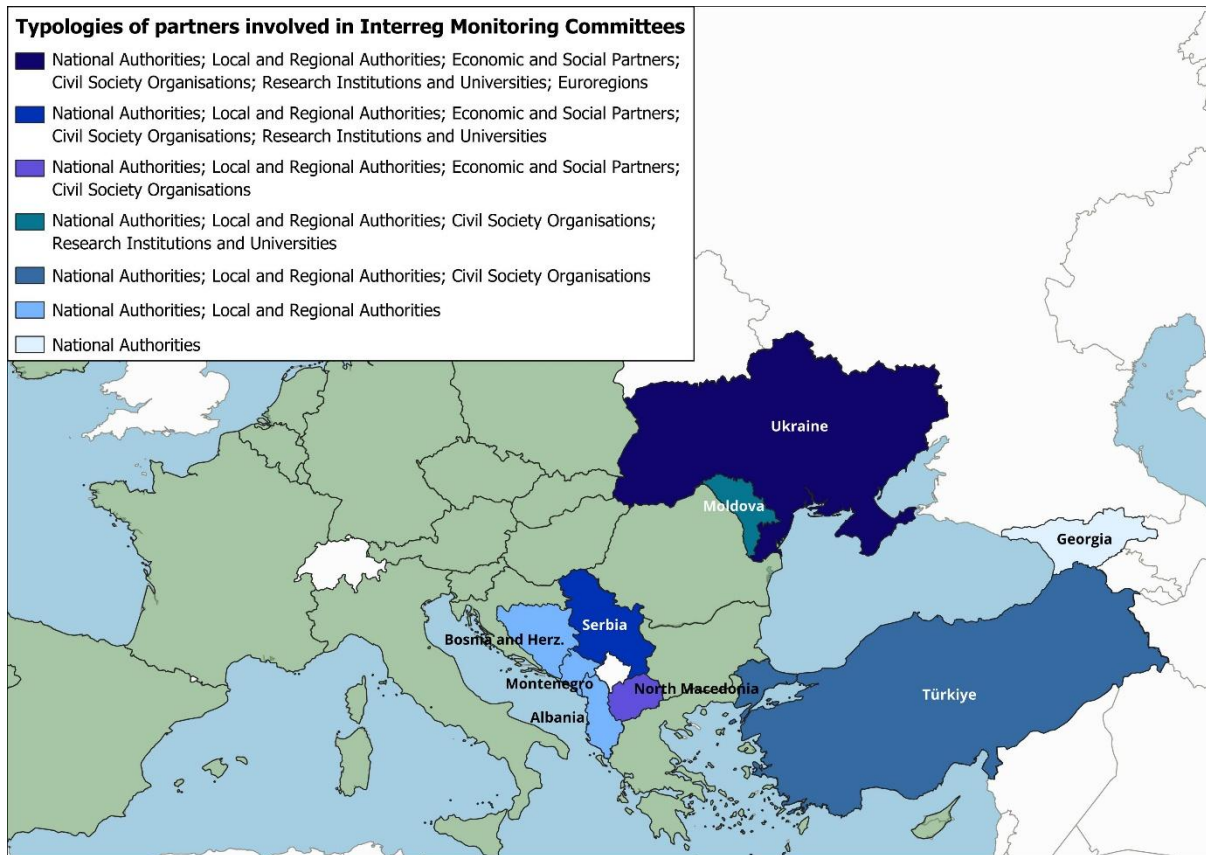
North Macedonia displays the involvement of four typologies of actors, namely National Authorities, Local and Regional Authorities, and Economic and Social Partners such as CSOs. A similar situation is observed in **Moldova**, where four typologies are also represented: National Authorities, Local and Regional Authorities, CSOs, and one university. In **Türkiye**, National Authorities, Local and Regional Authorities, and CSOs are represented in the relevant Monitoring Committees.

In contrast, **Albania, Bosnia and Herzegovina, and Montenegro** involve only public authorities – National, Local, and Regional. **Georgia** represents an outlier: being covered exclusively by one transnational programme (Interreg NEXT Black Sea Basin), the participation of only National Authorities in its Monitoring Committee is to be expected.

The map below illustrates the presence of the different partner typologies across the candidate countries.

⁵ The Euroregions involved in both the Programming Task Force and the MC of Interreg NEXT Poland-Ukraine are Euroregion Bug, Euroregion Karpacki, Euroregion Roztocze and Euroregion Puszcza Białowieska (only in the Monitoring Committee). A Euroregion is a cross-border territorial entity that unites partners from two or more cross-border regions in different European countries. Its aim is to create a cohesive space that is jointly developed so that the border ceases to be an obstacle and instead becomes a resource and an opportunity for development.

Figure 3: MC composition per candidate country (voting, non-voting and substitute members)



Source: own elaboration on all Interreg programmes covering candidate countries

The granular analysis of the 12 sampled Interreg programmes reveals systematic distinctions between **voting members** and those with **advisory** or **observer roles** across programmes. Most programmes ensured the participation of **National Authorities as core voting members** of the MCs, whereas the inclusion of regional and local authorities, economic and social partners, and CSOs was more selective and predominantly assigned non-voting status. Clear distinctions were made between voting members and those with advisory or observer roles in several programmes, with non-governmental stakeholders typically having no voting rights, being appointed as observers or members in advisory capacity.

The principle of ‘one vote per country delegation’ was predominantly applied, ensuring alignment with the overarching objective of balanced representation among participating countries. For example, the Interreg IPA Hungary-Serbia programme applies such a mechanism, ensuring that each national side maintains equal decision-making power regardless of the number of representatives. Where advisory or observer members are involved, their influence remains limited, although a gradual increase in their participation throughout the programme’s life cycle can be observed.

Clear **distinctions** emerge between **cross-border** and **transnational programmes** in terms of Monitoring Committees composition comprehensiveness and voting arrangements. The above-described trend was particularly evident in transnational programmes, aligning with patterns already observed in the composition of Programming Committees. Even in cross-border programmes – where a higher degree of partner involvement might be expected – certain limitations persist, with practical implementation often favouring institutional actors.

Cross-border programmes demonstrate significantly higher levels of stakeholder diversity and more sophisticated governance structures. The Interreg NEXT Romania-Moldova programme exemplifies comprehensive cross-border governance, where National Authorities, sectoral ministries, and a Regional Development Agency participate as voting members, while the Chamber of Commerce, Court of Accounts, and a CSO (Caritas Cechia-Moldovan branch) take part as observers. This broader inclusion has the potential to ensure better representation of sectoral and territorial interests during implementation.

In contrast, **transnational programmes demonstrated more restricted composition**, typically involving only National Authorities and line ministries as voting members. In transnational programmes, only National Authorities and few other national bodies participate as MC members, reflecting the scale and coordination requirements inherent to transnational cooperation where geographic scope and number of participating entities necessitate simplified governance structures that prioritise central coordination over local representation.

A **rotation mechanism** was notably applied in the Interreg NEXT Poland-Ukraine programme, where rotation was used to manage representativeness and avoid duplication. However, rotation does not appear to be widely adopted as a formal mechanism across other programmes, suggesting untapped potential for enhancing stakeholder engagement through structured rotation systems.

According to interviews with programme Managing Authorities, observers – particularly CSOs – tend to adopt rather **passive roles** in Monitoring Committee meetings, rarely intervening in discussions.

While the formal structure of MCs demonstrates partial alignment with partnership principles, the **substantive engagement and representativeness of partner types require further enhancement** to fulfil both the spirit and letter of the regulatory framework.

Also, the systematic preference for observer status over voting rights for non-governmental stakeholders, combined with limited rotation mechanisms, suggests **opportunities** for more ambitious interpretation of partnership requirements that could enhance both programme legitimacy and effectiveness. The following figure shows the composition of the Monitoring Committees per programme, including all Interreg programmes that cover candidate countries.

Figure 4: MC composition per programme (voting, non-voting and substitute members)

Programme	National Authorities	Local and Regional Authorities	Economic and Social Partners	CSOs	Research Institutions and/or Universities	Euroregions
Interreg IPA Bulgaria-North Macedonia	✓	✓	✓	✓		
Interreg IPA Bulgaria-Türkiye	✓	✓				
Interreg IPA Croatia-Bosnia and Herzegovina-Montenegro	✓	✓				
Interreg IPA Greece-Albania	✓	✓				
Interreg IPA Hungary-Serbia	✓	✓	✓	✓		
Interreg IPA South Adriatic	✓	✓				
Interreg NEXT Poland-Ukraine	✓	✓		✓	✓	✓
Interreg NEXT Romania-Moldova	✓	✓		✓	✓	
Interreg IPA ADRION	✓					
Interreg Danube	✓					
Interreg NEXT Black Sea Basin	✓					
URBACT IV	✓					
Interreg IPA Bulgaria-Serbia	✓	✓	✓			
Interreg IPA Croatia-Serbia	✓	✓	✓		✓	
Interreg IPA Greece-North Macedonia	✓	✓		✓		
Interreg NEXT Hungary-Slovakia-Romania-Ukraine	✓	✓	✓	✓	✓	
Interreg IPA Romania-Serbia	✓	✓	✓	✓		
Interreg NEXT Romania-Ukraine	✓	✓		✓	✓	
Interreg EURO MED	✓					
Interreg NEXT MED	✓					
Interreg Europe	✓					

Source: own elaboration on all Interreg programmes covering candidate countries

-  Sampled Interreg programmes
 Interreg programmes outside the study sample

The figure above highlights the remarkable profile of **Interreg NEXT Poland-Ukraine 2021-2027** in terms of the application of the partnership principle. The programme has followed a complex trajectory since the end of the previous programming period, due to geopolitical events and the consequent programme restructuring. As its predecessor, the programme was initially designed to include a third country, Belarus. However, the Russian military aggression against Ukraine in 2022 led to Belarus' exclusion from the programme and significantly impacted the programme's preparation process and delayed the public consultation phase for the 2021-2027 period.

Despite this unprecedented crisis, the efficient management of the programme and the thorough application of the CPR requirements created a favourable environment to establish

a comprehensive preparation process that involved several bodies from every layer of society. The composition of the Monitoring Committee mirrored the programming phase, as illustrated in the box below.

→ **Good practice: Interreg NEXT Poland-Ukraine 2021-2027**

One of the key strengths of the Interreg NEXT Poland-Ukraine programme, already evident when Belarus was still part of it until 2022, is the **wide involvement of different types of bodies during the programming and implementation stages**. The composition of the Joint Programming Committee and the Monitoring Committee is fully compliant with Article 16 ('Preparation and submission of Interreg programmes') and Article 29 ('Composition of the monitoring committee') of the Regulation (EU) 2021/1059 requirements, both referring to Article 8 ('Partnership and multi-level governance') of the Regulation (EU) 2021/1060. More specifically, the Joint Programming Committee and the Monitoring Committee gathered (from the Ukrainian side): National authorities; Regional, local, urban and other public authorities; Economic and social partners; Relevant bodies representing civil society, such as environmental partners, non-governmental organisations and bodies responsible for promoting social inclusion; Research organisations and universities.

This exhaustive and well-balanced representation of relevant actors constitutes a distinguishing feature of the Interreg NEXT Poland-Ukraine 2021-2027 programme, which was not consistently observed across the other programmes object of this study.

Besides the full respect of the partnership principle, it is quite relevant to report the **participation of different Euroregions** throughout every phase concerning the **preparation and implementation of the programme**. Euroregions are transnational co-operation structures between two (or more) contiguous territories located in different European countries, created to facilitate cross-border, transnational and interregional cooperation between Member States and neighbouring countries, or their regional and local authorities. The participation of Euroregions in the preparation and implementation of Interreg programmes is provided for in Article 29(1)(b) of Regulation (EU) 2021/1059.

The functioning of Monitoring Committees is generally well supported. While basic support structures are in place across all candidate countries, **the depth and quality of this support vary**, and several challenges persist.

In **Albania**, agendas and background documents are circulated in advance, and informal preparatory meetings are held between National Authorities and Monitoring Committee members. However, members' capacity to interpret and use the information differs, reflecting uneven competencies across stakeholder groups and highlighting the need for more explanatory materials and structured pre-meeting consultations to ensure effective participation. In **Moldova**, members receive documentation in due time and follow-up is ensured, but the strong reliance on email exchanges limits structured dialogue and collaboration efficiency.

Partner involvement in programme performance review and amendment remains an area for improvement in the candidate countries. Technical complexities continue to pose a barrier for Monitoring Committee members, and **programme evaluation reports do not appear to be systematically accessed or used** to enhance understanding of programme functioning and impact.

4.2. National sub-committees

National sub-committees are not embedded in the regulatory framework of cohesion policy programmes. They represent a mechanism that depends entirely on national institutional arrangements. However, given the existing limitations in the application of the partnership principle, these sub-committees appear to play an important role, which warrants dedicated attention in this study.

The establishment and functioning of national sub-committees or thematic working groups varies significantly across programmes and countries, with most candidate countries showing **limited interest** in these complementary governance structures. Most programmes rely primarily on main Monitoring Committees without systematic establishment of thematic working groups or national sub-committees that could enable more detailed discussions and broader stakeholder engagement at national level.

Such a gap becomes particularly pronounced in transnational programmes, where national sub-committees, as shown by the experience in Member States, serve as essential coordination platforms for complex multi-country arrangements where the size of the Monitoring Committees limits the possibility to have a multi-level and multi-sector partner representation and internal alignment is essential.

A relevant example is Interreg IPA South Adriatic 2021–2027, where the establishment of the Italian national sub-committee - described in the box below - has proved beneficial for the programme, whereas Albania and Montenegro have not adopted a similar practice.

→ Good practice: Interreg IPA South Adriatic 2021-2027

The establishment of national sub-committees for the coordination of Interreg programmes is highly recommended but not mandatory, and it is not required in the relevant regulations. An example of effective national coordination of Interreg programmes is the **Italian national subcommittee for Interreg IPA South Adriatic** is a well-functioning coordination structure that brings together regional authorities, national ministries, and representatives of CSOs. This platform, centrally coordinated by the Department for Cohesion Policy and the South (acting directly under the Presidency of the Council of Ministers), supports the alignment of the Interreg programme with broader national strategic frameworks and ensures coherence with the priorities of the **European Union Strategy for the Adriatic and Ionian Region (EUSAIR)**. The subcommittee contributes to identifying thematic priorities and facilitates internal coordination of Italian positions in preparation for programme-level governance activities, such as the active participation in Monitoring Committee meetings.

While the institutional context in candidate countries may differ, the Italian experience illustrates how a structured and inclusive national coordination body can enhance programme consistency, strengthen links with macro-regional strategies, and reinforce stakeholder involvement in a multilevel governance setting. Such subcommittees exist for all Interreg programmes with Italian participation, i.e. not exclusively the ones where the MA is located in its territory.

In 2025, a public call for expressions of interest was published by the Department for Cohesion Policy and the South to identify future members of all national Interreg sub-committees coming from the economic, social, and civil society partnerships. The primary objective of such call was to ensure that the voices of local communities, businesses, associations, and CSOs are adequately represented in the governance of Interreg programmes, promoting more equitable and sustainable development at the cross-border, transnational, and interregional levels.

One of the key **distinctions emerging from the analysis is the contrast between formal and informal arrangements**. While generally Member States have formalised national sub-committees, with defined roles and responsibilities, the candidate countries use a less formal mechanism at the national level. This does not imply the absence of coordination, as they include regular preparatory meetings ahead of Monitoring Committee sessions or separate consultations/ workshops on specific topics. In the case of cross-border programmes, these preparatory meetings often involve multiple local/ regional stakeholders, while for transnational programmes, the coordination practices tend to be more focused on informing relevant line ministries or agencies that may not be directly involved in the programme's governance but are nonetheless concerned by specific thematic areas.

The degree of formalisation and visibility of these structures remains uneven, with Managing Authorities frequently reporting **limited insight into national-level coordination mechanisms** within candidate countries. While certain **good practices** have been identified, there is considerable scope for strengthening the structured mobilisation and transparent functioning of national sub-committees. Enhancing these mechanisms would support both the **legitimacy** and **effectiveness** of stakeholder participation within the broader Interreg governance framework.

As the predominant voting arrangement within the Monitoring Committees is based on the principle of 'one vote per country delegation', the capacity of various partners – particularly those with less institutional weight, such as **local authorities, socio-economic partners, CSOs, research institutions, universities** – to express their positions is more effectively ensured if a well-structured process of **national dialogue** is established through a dedicated

sub-committee. . At the same time, it must be acknowledged that, **in the absence of** a clear and systematic mechanism for **reporting the outcomes of the work of national sub-committees** to the programme level, **the programme authorities and the European Commission may lack knowledge** of partner involvement within each candidate country, thereby limiting their ability to monitor the application of the partnership principle.

In this context, it has emerged that **some candidate countries maintain informal consultation networks and ad hoc engagement mechanisms** that provide input to programme authorities, though these lack the systematic structure and formal mandate that national sub-committees could provide.

Serbia shows partial progress through establishing ad hoc coordination bodies for specific programmes but lacks systematic institutionalisation across its programme portfolio. **Moldova** demonstrates emerging coordination practices but without formal structuring or systematic stakeholder integration, resulting in missed opportunities for multi-level governance enhancement. This case is illustrated in the box below.

→ **Good practice: Interreg NEXT Romania-Moldova 2021-2027**

In 2020, the Republic of Moldova established a **National Working Group (NWG)** for **coordinating the implementation** of cross-border and transnational cooperation programmes with the financing of the European Union. The NWG was constituted by representatives of the Ministry of Finance, the State Chancellery, the Ministry of Foreign Affairs and European Integration, the Ministry of Agriculture, Regional Development and Environment, the Ministry of Economy and Infrastructure, the Ministry of Health, Labor and Social Protection, Regional Development Agencies, the Public Institution 'Public Audit Oversight Council', the Public Institution 'External Assistance Program Management Office', as well as representatives delegated as observers by the Court of Accounts and the National Anticorruption Centre.

Depending on the need, the NWG involved representatives of other central public administration authorities, local public administration authorities, civil society and experts in the field. NWG participated in the **examination of the content of the programming documents** within the cross-border and transnational cooperation programmes and presented proposals.

In the context of the Interreg NEXT Romania-Moldova 2021-2027 programme, particular emphasis is placed on ensuring **alignment with national and regional programmes** within the eligible area and preventing instances of double funding.

4.3. Transparency and conflict of interest

Under Regulation (EU) 2021/1060, each Monitoring Committee is required to adopt its rules of procedure, including measures to prevent conflicts of interest and to ensure the application of the principle of transparency (Art. 38). Complementing this, Regulation (EU) 2021/1059, which establishes the specific provisions for Interreg programmes, stipulates that operations are to be selected by the Monitoring Committee, with the possibility of setting up one or more dedicated steering committees (Art. 22). Importantly, these steering committees must apply the partnership principle as defined in Article 8 of Regulation (EU) 2021/1060. This arrangement differs from that of regional and national ERDF programmes, where, in accordance with Article 73 of Regulation (EU) 2021/1060, the Managing Authority is responsible for the selection of operations.

Within this more collective and participatory governance model, participation in an Interreg Monitoring Committee entails the responsibility to prevent any conflict between members' institutional or personal interests and their role in decisions on project financing.

The management of transparency requirements and conflict of interest situations reveals a **generally solid procedural foundation** across candidate countries, though with persistent implementation challenges that create barriers to effective stakeholder participation. The analysis demonstrates that, while formal compliance with transparency requirements is adequate, significant **gaps** emerge in **stakeholder perceptions and practical implementation** that undermine the intended inclusiveness of partnership governance.

All programmes have established **Rules of Procedure (RoP)** for Monitoring Committees as the primary instrument for governing transparency and potential conflicts of interest. These procedural frameworks generally provide adequate safeguards, with no significant conflict-of-interest cases reported across the examined programmes. The regulatory context of Interreg programmes, where Monitoring Committees are responsible for operation selection rather than Managing Authorities, creates particular importance for robust conflict management mechanisms that are largely functioning as intended.

However, the analysis reveals a critical gap between procedural compliance and practical implementation effectiveness. **The most significant challenge concerns perceived conflicts experienced by certain categories of stakeholders, particularly local authorities and CSOs.** Consulted programme bodies reported instances in which these actors were reluctant to participate in Monitoring Committees, even as observers, due to concerns that formal governance roles could compromise their eligibility for programme funding. Although no formal restrictions apply, this perception would create a substantial barrier to multilevel governance by limiting the participation of actors whose territorial knowledge and representativeness could strengthen programme oversight.

Conversely, **the survey distributed to CSOs in the candidate countries revealed widespread interest in joining Monitoring Committees**, while still showing a **higher level of awareness of potential conflicts of interest among those CSOs that had already participated in Interreg consultations.** On one hand, the survey confirms that familiarity with Interreg programmes enhances awareness of possible conflicts of interest; on the other hand, it suggests that relying solely on information provided by institutional stakeholders may not fully capture the expectations and interests of non-public organisations regarding their active participation in the co-management of Interreg programmes.

In **Interreg IPA Bulgaria–North Macedonia**, an interesting dynamic was observed. The programme selected **Policy Objective 5** and envisaged the development and implementation of a territorial strategy in a targeted cross-border area. Local stakeholders were involved both in the preparation and in the implementation of the strategy, including the selection of operations. This represents a case in which **potential conflicts of interest were effectively managed, with stakeholders assuming responsibilities at their own local level**, allowing them to remain close to their specific areas of focus and to better understand the overall context of programme implementation. This approach appears particularly ambitious - yet potentially highly rewarding - within the cross-border cooperation framework involving candidate countries. The case is illustrated in the box below.

→ **Good practice: Interreg IPA Bulgaria-North Macedonia 2021-2027**

The programme includes **PO5 ‘Fostering the integrated social, economic and environmental development, cultural heritage and security in areas other than urban’** supporting an integrated investment strategy at the relevant territorial level.

To appropriately plan actions under PO5, the Managing and National Authorities initiated a bottom-up process to develop an Integrated Territorial Strategy. A dedicated Task Force Group (TFG) was formed to guide the **strategy’s development**, ensuring the representation of all relevant stakeholders - mainly local authorities. It allowed the programme to work closely with territorial stakeholders and to integrate their feedback into the strategy. Toward the end of 2021, a public campaign was launched to gather project ideas aligned with the strategy. Five educational webinars were held to provide guidance on PO5 complexity and the functional approach to planning and implementation.

The final strategy adopted is structured around two specific objectives: strengthening the competitiveness of the local economy and business environment, and developing an attractive, all-season tourism offer based on smart and inclusive solutions. The strategy targets a diverse group of beneficiaries, including local communities, public administrations, NGOs, research institutions, academia, training centres, social organisations, and SMEs. This experience demonstrated that focusing on specific local areas within the broader cross-border region can allow for the activation of sub-groups that can contribute more effectively to programme design at their respective levels.

What is particularly relevant is considering the issue of **conflict of interest** and the role envisaged for local stakeholders - municipalities, districts, NGOs, professional organisations, and businesses. **These actors were not only involved in the design of the strategy through their participation in the TFG but are also represented in the Strategy Board, which oversees the implementation of the strategy.** The transition from strategy design to implementation began once the strategy was formally endorsed by the board, which took over from the TFG. The implementation phase includes the **crucial task of selecting operations**, placing **responsibility in the hands of local stakeholders to act transparently and with full ownership of the strategy.**

To avoid conflict, a dual assessment system is applied: the Strategy Board only verifies whether proposals align with the objectives of the strategy. Its role in the selection of proposals remains limited, as the main assessment is largely carried out by independent experts.

Finally, an important aspect related to the transparency of institutional processes in the candidate countries was raised. **Limited evidence was found of structured mechanisms for the appointment of Monitoring Committee members**, suggesting an inconsistent

application of transparency principles across countries. Procedures and criteria for selecting both institutional and non-institutional members were identified in very few cases, along with evidence of continuity across programming phases (preparation and implementation) and programming periods. **This approach represents an area for improvement in the candidate countries.** Furthermore, the establishment of national sub-committees could provide a more inclusive mechanism, strengthening transparency in the application of the partnership principle in the candidate countries by establishing open and clearly structured processes for stakeholder participation. National sub-committees can address this need while allowing to expand the programme discussion on the ground and bring the relevant stakeholders views to the table.

5. Structural challenges in partner involvement beyond national level

The analysis revealed persistent difficulties in engaging partners beyond national authorities across several stakeholder categories, creating barriers to the effective implementation of multi-level governance.

This section illustrates the difficulties encountered by non-national stakeholders, presented by stakeholder group. In addition to the typologies of actors prescribed in the regulatory framework, it also highlights the limitations affecting the participation of youth organisations, given the relevance of this group.

Local and regional authorities from all candidate countries, except for Georgia, are represented in the Monitoring Committees of the relevant Interreg programmes. However, their influence and level of involvement in the preparation and implementation of these programmes remain significantly lower compared to the national authorities of the candidate countries.

1. **The additional workload** resulting from participation in Interreg programmes is often discouraging for them. Regional and local authorities report decreasing levels of involvement following periods of intensive email exchanges and tight deadlines for document review, with many finding the collaborative process - based largely on extensive correspondence - inefficient and overwhelming.
2. Ensuring the involvement of **qualified and committed personnel** is difficult for most of the consulted local and regional authorities. Adequate preparation and institutional support to contribute effectively to strategic discussions and programme decision-making are particularly challenging for local authorities. Moreover, umbrella organisations representing local and regional authorities are not consistently involved across the candidate countries and often lack sufficient capacity themselves.
3. **Language barriers** represent another major obstacle, as limited administrative capacity and insufficient English proficiency hinder meaningful participation.

In this context, the role of **Interreg URBACT IV** appears particularly relevant. This programme encourages local authorities - in particular municipalities - to apply the partnership principle at their own scale as a method for developing urban projects. The new focus on the Western Balkans, explained in the box below, represents an excellent opportunity to strengthen the landscape of local administrations across the candidate countries. It helps to prepare the ground for a wider application of the partnership principle in future programming periods - and possibly within regional and national programmes once these countries accede to the EU.

→ Good practice: Interreg URBACT IV 2021-2027

The URBACT Pioneers Accelerator is a tailored capacity-building initiative designed for cities in the Western Balkans, specifically Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, and Serbia, aimed at strengthening cities from IPA beneficiary. Recognising the region's distinct socio-economic and political landscape, the project supports municipalities in developing sustainable urban policies through a hands-on, collaborative learning journey. It is aimed at addressing sustainable urban development challenges and at providing them with methods and tools to implement EU principles for integrated and participatory urban development, as well as learning from peers and sharing solutions to common challenges.

Approximately **20 cities** are selected to participate, each represented by a dedicated municipal team. These teams engage in transnational exchanges, co-design pilot projects, and document their learning through dynamic journals. The initiative fosters a **new generation of urban leaders** who are pioneers equipped to rethink traditional governance models and champion inclusive, participatory approaches to city-making.

By promoting **decentralised decision-making** and **empowering local communities**, the URBACT Pioneers Accelerator exemplifies how targeted support and peer learning can catalyse meaningful change in urban environments. It is not only a training project but a strategic investment in the future of cities striving for EU integration and sustainable development.

The URBACT Pioneers Accelerator can provide valuable insights into effective urban development, particularly in regions preparing for EU accession. One of the most significant lessons is the importance of integrated and **participatory approaches**, where cities address environmental, social, and economic dimensions while actively involving local stakeholders and citizens. Tailored support through local mentors, masterclasses, and thematic experts proved essential in building practical skills and translating strategic concepts into action.

The project's emphasis on 'learning by doing' through small-scale pilot projects enabled cities to test solutions, generate quick wins, and build momentum for broader transformation. Transnational exchanges and thematic expeditions fostered a strong **peer-learning environment**, allowing cities to share experiences and strengthen regional cohesion. The scalable support system, cross-border collaboration, and focus on tangible outcomes align well with Interreg's goals of territorial cooperation and sustainable development. Moreover, the knowledge products generated can serve as practical guides for other cities embarking on similar transformation journeys.

Civil Society Organisations participate in the Monitoring Committees of five candidate countries (Moldova, North Macedonia, Serbia, Türkiye, and Ukraine). Overall, their participation in the life of Interreg programmes exposes them to a complex set of deterrents which exacerbate their structural weaknesses.

1. The **technical complexity of EU programmes** requires a significant effort to prepare coherent and well-founded contributions, which many organisations find prohibitive given their limited resources.
2. From the perspective of the Managing Authorities, CSOs are often perceived as reluctant to engage in the strategic work of Interreg programmes due to differing priorities, limited expertise, and concerns about **potential conflicts of interest**. When directly surveyed, CSOs expressed a general interest in participating in

Monitoring Committees; however, those with greater familiarity with Interreg displayed a higher awareness of the risks related to conflicts of interest.

3. The analysis found no evidence of systematic capacity building support, such as workshops, training sessions, or financial assistance mechanisms, aimed at strengthening the involvement of CSOs in programme development processes.
4. When activated at the local level - for instance, within the framework of territorial strategies developed under Policy Objective 5 - CSOs tend to maintain a clearer focus and make stronger contributions to Interreg programmes, both in the design and implementation phases.

Economic and social partners demonstrate considerably more limited participation than public authorities, being represented in the Monitoring Committees by stakeholders (chambers of commerce and development agencies) from only three candidate countries (Montenegro, Serbia, and Ukraine). This reflects persistent challenges in mobilising non-public stakeholders across the economic spectrum. It is worth highlighting that most of the Economic and Social Partners represented in the Monitoring Committees are from Serbia. Business associations engage to a lesser extent than other stakeholder categories in consultation processes, with programmes reporting difficulties in identifying relevant private sector actors during public consultations.

The challenge extends beyond identification to sustained engagement, as economic partners often lack familiarity with EU programming procedures and may question the direct relevance of territorial cooperation programmes to their business interests.

Academic institutions, while more manageable to involve compared to other non-public actors, still face engagement limitations that restrict their participation in Monitoring Committees to specific countries, namely Moldova, Serbia, and Ukraine. Non-governmental actors, including academic institutions, in programmes such as Interreg NEXT Poland-Ukraine, report being involved only during later consultation stages rather than at the programming level, which limits their input to programme content and strategic direction. This delayed involvement reduces the analytical and evidence-based dimension that universities and research organisations could contribute to programme design.

Youth organisations represent a particularly challenging category for engagement, despite their relevance to several programme themes and EU priorities. Although youth organisations are not explicitly identified in the regulatory framework as actors to be involved under the partnership principle, this study has dedicated specific attention to their potential role given their importance for future territorial cooperation, finding that across the examined cases, the involvement of youth organisations in the programme preparation phase has been generally limited or absent. This reflects both capacity constraints within youth organisations themselves and systematic barriers on the programme side.

1. Most youth organisations operate as voluntary associations with limited membership, unstable funding and high staff turnover that undermines institutional memory and expertise development, while their typically informal organisational structures make it difficult to maintain consistent representation in lengthy programming processes.
2. Youth organisations often lack the administrative capacity to review complex programme documents or prepare technical contributions, and the temporary/project-based nature of many initiatives means they may lack the long-term perspective required for strategic programme planning.

3. On the other hand, programme and national authorities frequently lack dedicated outreach strategies for youth engagement, relying on existing networks that may not include youth organisations or assuming that broader civil society consultation adequately represents youth perspectives.

These challenges result in a systematic underrepresentation of youth perspectives in programme design, despite the fact that many programmes include youth as target beneficiaries. The disconnect between youth as programme targets and youth organisations as programme partners highlights the need for more sophisticated approaches to stakeholder involvement which account for the specific characteristics and needs of different partner categories.

Cross-cutting barriers affect all non-national actors and create systemic obstacles to effective partnership implementation. Language barriers and digital access gaps particularly limit participation from peripheral organisations, with the pandemic-related shift to online tools increasing numerical participation while paradoxically reducing active engagement from non-institutional actors.

6. Proposed actions

This section articulates proposed actions at three levels: for the **European Commission**, for the **Managing Authorities** of the Interreg programmes covering the candidate countries, and for the **national stakeholders of these programmes in the candidate countries**.

6.1. European Commission

The Interreg current regulatory framework - mainly set out in Regulation (EU) 2021/1059 and its reference to the Common Provisions Regulation (EU) 2021/1060) - offers a robust legal and procedural base for applying the partnership principle. Continued focus on the partnership principle within the Interreg framework emerges from the European Commission's proposal for post-2027 Interreg.

However, the analyses carried out indicate that the application of the partnership principle in the candidate countries faces structural limitations. A key challenge lies in the prevailing focus on procedural conformity - for instance, ensuring that consultations have taken place - rather than on the quality, inclusiveness, and impact of stakeholder participation.

The study emphasises that weak institutional and administrative capacities constrain meaningful participation in candidate countries, risking the reduction of the partnership principle to a procedural exercise. Effective implementation therefore also depends on capacity-building measures targeting both national authorities and civil society actors.

Proposed action: Strengthening participatory governance through targeted capacity-building

The European Commission is encouraged to play a more proactive role by supporting training, technical assistance, and exchange platforms dedicated to participatory governance in Interreg programmes involving enlargement countries. Such initiatives could be integrated into existing frameworks, through TESIM, Interact or funded under Technical Assistance components of Interreg programmes. This would help overcome

disparities in administrative experience and ensure that the partnership principle contributes to institutional strengthening and democratic governance, not just programme efficiency.

DG REGIO could make systematic use of existing stakeholder mapping exercises, with particular attention to CSOs. Such mappings are, for example, carried out by DG ENEST in candidate countries in the framework of its civil society support programmes and instruments, including TACSO. Drawing on this existing knowledge base would help ensure that capacity-building measures are more widely targeted and more responsive to local governance and partnership structures. This could lead to a more robust application of the partnership principle in cohesion policy programmes.

The study found that contributions from local authorities, socio-economic partners, and civil society organisations were most effective when directed towards advocating for specific projects of strategic relevance to their communities. This dynamic was particularly evident when Policy Objective 5, 'A Europe closer to citizens by fostering the sustainable and integrated development of all types of territories and local initiatives' was selected - namely, when cooperation programmes were anchored in territorial strategies, especially those with a cross-border dimension.

Proposed action: Encourage adopting the territorial strategy approach in the Interreg Plans

Encourage the development of territorial or local development strategies in relevant cross-border areas involving candidate countries. These strategies provide a structured framework for engaging local and sectoral actors throughout the programming cycle, ensuring that participation remains meaningful and transparent while addressing concerns about potential conflicts of interest. This approach supports more balanced, inclusive, and context-sensitive application of the partnership principle. The good practices emerging from the Interreg IPA programmes managed by the Bulgarian authorities, as well as from the intra-EU Interreg programme Italy–Austria, which finances cross-border CLLD, could serve as a useful reference.

6.2. Managing Authorities

The analysis indicates that involving local authorities, sectoral bodies, and civil society organisations in programme design remains a challenge. Differences have emerged between cross-border programmes - where adherence to territorial specificities can be decisive - and transnational programmes, where alignment with the respective macro-regional frameworks is essential.

Proposed action: Adapt consultation modalities to the programme's territorial scope

Managing Authorities of cross-border programmes should better exploit the potential of in person consultations at the local level, namely in strictly cross-border areas, to collect contributions from local authorities, socio-economic partners, and civil society organisations of a sufficient quality to improve programme design.

Conversely, Managing Authorities of transnational programmes should, when relevant, systematically involve stakeholders already active within macro-regional strategy

structures so strengthening alignment with the macro-regional dimension and contribute to broader cross-sectoral representation.

Structured feedback should be provided to all consulted stakeholders, both in relation to their individual contributions and to the overall outcome of the consultation process in terms of programme improvement.

Consistent with the findings of a recent Interact study, the analysis confirmed that maintaining their territorial and thematic focus is essential for civil society organisations to add value to the programme lifecycle. The technical aspects of programme preparation and management often discourage civil society organisations from making a proactive contribution. By contrast, participation in Interreg programmes is significantly facilitated when programme objectives are clearly aligned with the organisations' core missions, such as the protection of local environmental assets or the empowerment of disadvantaged groups in marginalised areas.

Proposed action: Involve CSOs at their own thematic and territorial scale

The potential of civil society organisations to participate in the design and implementation phases should be examined in greater detail by the managing authorities. Targeted consultations and engagement at the appropriate territorial scale should be systematically pursued as a strategy to enhance the participation of civil society organisations in all phases of Interreg programmes.

Overall, the study showed limited involvement of non-public actors in both the programming and implementation phases. However, it also found that when engagement occurs at the local level - for instance, within the framework of territorial strategies developed under Policy Objective 5 - non-public actors tend to maintain a clearer focus and make stronger contributions to Interreg programmes in both design and implementation. Even potential conflicts of interest appear to be managed more effectively in these cases.

Proposed action: Involve non-public actors in the framework of territorial strategies

Consistent with the action proposed to the European Commission (see above), Interreg managing authorities should engage for the adoption of the territorial approach in the candidate countries. In the current programming period, only three programmes covering candidate countries - those managed by the Bulgarian authorities - have adopted territorial strategies. The good practices emerging from the Interreg IPA programmes managed by the Bulgarian authorities, as well as from the intra-EU Interreg programme Italy–Austria, which finances cross-border CLLD, could serve as a useful reference.

6.3. Candidate countries

This section, which builds on the information provided in a cross-cutting thematic manner in previous sections, presents conclusions and suggestions for improvement addressing the nine candidate countries covered in the study. These conclusions and suggestions are mainly addressed to the countries' respective national authorities, i.e. representatives of selected Interreg programmes in the countries. For each country, actionable recommendations have

been elaborated stemming from the key challenges identified in the application of the partnership principle in the programming and/or implementation of the examined programmes.

National authorities in candidate countries play a central and multifaceted role in the implementation of the partnership principle within the analysed Interreg programmes. They act as the key intermediaries between the central programme bodies (Managing Authorities and Joint Secretariats) and the national and sub-national and non-governmental stakeholders, ensuring that EU cohesion policy principles are effectively translated into the design and implementation of the programmes at the national and regional contexts. This is particularly important as Interreg programmes involving candidate countries act as a catalyst for the familiarisation and preparation of these countries to the implementation of Cohesion Policy support upon EU accession.

During the programming phase, national authorities are responsible for disseminating information, mobilising relevant partners in consultations and ensuring the alignment of programme priorities with national strategic frameworks. Their mediation often determines whether regional, local and civil society actors can meaningfully engage in consultation processes. In some cases, proactive national authorities in the candidate countries facilitated bottom-up involvement and ensured that consultation outcomes directly informed the choice of programme priorities, demonstrating that committed institutional leadership can enhance inclusiveness and programme relevance.

However, the study finds significant disparities in how national authorities exercise this role. Weaker administrative capacity, high turnover and the absence of structured national coordination mechanisms (e.g. national sub-committees) hinder the involvement of sub-national and non-governmental actors, and thereby the full application of the partnership principle. In contrast, countries with more institutionalised coordination frameworks illustrate how national authorities can better structure participation in the programmes' design and implementation. The strength and proactivity of national authorities are therefore decisive for turning formal partnership compliance into meaningful stakeholder involvement.

The following proposed actions, addressed to national authorities in candidate countries in order to ensure better application of the partnership principle, are based on positive examples identified in the programming and implementation of the selected Interreg programmes.

Proposed action: Ensure the inclusion of umbrella organisations in programming Task Forces and Monitoring Committees

National authorities should ensure the inclusion of umbrella organisations in programming Task Forces and Monitoring Committees. Such organisations, representing the local level (e.g. unions of municipalities) or civil society (e.g. bodies aiming at the thematic or territorial representation of CSOs), gather the insights of a high number of actors in the territories, guaranteeing their points of view are heard. This not only enhances partner involvement, but also simplifies the involvement process, making it more efficient and manageable. At the same time, umbrella bodies serve as a strategic tool for promoting consistent decentralisation efforts across candidate countries.

The establishment and empowerment of umbrella organisations, where absent or weakly structured, should be also encouraged by national authorities. Supporting umbrella bodies is an effective means of involving diverse stakeholders in Interreg programmes, as these organisations can represent the collective interests of multiple local and regional actors through a single, coordinated voice.

Proposed action: Establish national sub-committees

National authorities are encouraged to establish national sub-committees, particularly to support transnational programmes where only the national level is represented. In Member States, national sub-committees have proven to be a successful model for coordinating and aligning national priorities with programme objectives as well as macro-regional strategies. These structures can foster inclusive governance by bringing together regional and local authorities, line ministries, and CSOs, thereby strengthening partner involvement, while also enhancing transparency and coherence in implementation by establishing open and clearly structured processes for stakeholder participation.

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