

13 October 2025

Subject: Integrating Enlargement into the MFF 2028–2034: A Strategic Financial Commitment to the Western Balkans, Republic of Moldova and Ukraine

We are writing to kindly request your attention to the strategic importance of ensuring that the European Union’s enlargement policy is fully reflected in the upcoming Multiannual Financial Framework (MFF) for 2028–2034, through the allocation of adequate and dedicated funding for enlargement.

We take note of the Commission’s July 2025 proposal for the next MFF (2028-2034), the geopolitical imperative of the EU enlargement policy and financial underpinnings of it, we respectfully propose the formal inclusion of a dedicated “Enlargement” budget envelope within the 2028–2034 MFF. This would provide a credible financial roadmap to match the EU’s political commitments and support candidate and potential candidate countries as they carry out crucial reforms in line with EU standards.

At present, it is not clear whether the MFF consultation process does adequately reflect the scale of resources required for enlargement. Without dedicated budgetary mechanisms aligned with accession timelines and proportionate to the scope of required support, the EU risks creating a gap between its political promises and its financial preparedness.

Following the presentation of the new MFF proposal by the European Commission on 16 July 2025, and in light of the December 2024 European Council [Conclusions](#) on Enlargement there is a critical window to ensure that enlargement features as a central strategic priority for the EU, backed by the necessary financial instruments.

We would like to present the following recommendations for your consideration:

1. **Create a dedicated budget envelope for Western Balkans, Republic of Moldova and Ukraine integration.** (for those countries that complete accession negotiations until their full-fledged membership), designed to:
 - Establish a “*pre-accession transition*” budget line to bridge the gap between negotiations and membership.
 - Provide phased, merit-based access to structural and cohesion funds through a dedicated mechanism.
 - Actively engage national governments and civil society in pre-accession funding processes.
2. **Ensure funding scales with performance and reforms**, enabling phased and merit-based access to the single market and EU programmes.
3. **Maintain a robust IPA IV with at least €30 billion in grants:** Design IPA IV with a shift toward active integration. The new IPA IV should merge the strengths of IPA I–III with the performance-based features of the Ukraine Facility, the WB Reform and Growth Facility, and the Moldova Facility.

We strongly believe that the credibility of the EU's enlargement commitments hinges on predictable and adequate financial resources. The upcoming MFF represents a unique opportunity to reinforce enlargement policy with the funding required to deliver on EU promises.

We stand ready to provide further input and would welcome the opportunity to engage with you to contribute constructively to this debate.

Yours sincerely,

1. Albanian Centre of European Policies (E+)
2. ACIT Centre, Albania
3. Albanian Young Professionals Network, Albania
4. Center for Economic Strategy, Ukraine
5. Center for Social Advocacy, Albania
6. Center Science and Innovation for Development (SCiDEV), Albania
7. Centre for Legal Empowerment, Albania
8. Centre of Policy and Legal Reform, Ukraine
9. Co-PLAN, Institute for Habitat Development, Albania
10. Democracy and Mediation (IDM), Albania
11. DiXi Group, Ukraine
12. EasyBusiness NGO, Ukraine
13. Education Advising Centre, Moldova
14. EU Policy Hub/Forumi, Albania
15. European Democracy Youth Network (EDYN), Regional (members in Western Balkans, Central and Eastern Europe, and the South Caucasus)
16. European Policy Institute of Kosovo (EPIK), Kosovo
17. Expert-Grup, Moldova
18. Finance Think, North Macedonia
19. GAP Institute, Kosovo
20. Institute for Communication & Dialogue, Albania
21. Institute for Economic Research and Policy Consulting, Ukraine
22. Institute for Strategic Initiatives (IPIS), Moldova
23. Institute of Policy and Legal Studies, Albania
24. Keystone, Moldova
25. Kosovar Centre for Security Studies (KCSS), Kosovo
26. Kosovar Civil Society Foundation (KCSF), Kosovo
27. Kosovar Institute for policy research and Development (KIPRED), Kosovo
28. Legal Resource Center, Moldova
29. Levizja Rinore Egjiptiane dhe Rome, Albania
30. Mitrovica International Jazz Days, Kosovo

31. New Europe Center, Ukraine
32. NGO "Ukrainian Centre for European Policy", Ukraine
33. Partners Albania for Change and Development, Albania
34. Post-Conflict Research Center (PCRC), Bosnia and Herzegovina
35. Presidential Center Stevo Pendarovski, North Macedonia
36. Promo-LEX, Moldova
37. Regional Center for Advanced Studies of Southeast Europe, Serbia
38. Riinvest Institute, Kosovo
39. Social Justice, Albania
40. The AO "Institutum Virtutes Civilis", Moldova
41. The Belgrade Centre for Security Policy, Serbia
42. The Institute for European Policy and Reform, Moldova
43. TREJA Centre, Albania
44. Ukrainian Institute for International Politics, Ukraine
45. Youth Educational Forum, North Macedonia
46. Strategers Institute, North Macedonia