Strengthening Civil Society Engagement in the Western Balkans Investment Framework:

A Necessary Condition for Sustainable and Inclusive EU Accession

A New Chapter Demands a New Approach

The Western Balkans are entering a pivotal phase in their EU integration journey. With Albania and Montenegro having opened nearly all negotiating clusters and aiming to conclude accession negotiations by 2027, the pressure is mounting not only to deliver reforms but to anchor them in democratic legitimacy and public trust.

This level of support is unprecedented. But so is the democratic deficit that accompanies it.

Despite the transformative scale of these investments, civil society organizations (CSOs) have been entirely excluded from the programming stage—both at national and regional levels.

They are not consulted on project pipelines. They are not engaged in identifying local needs. They are not present in governance structures that steer the WBIF.

At present, CSO involvement is limited only to the monitoring of National Reform Agendas (NRAs) and even this comes late in the process, after projects have been designed, approved, and funded. Simply put: CSOs are asked to audit decisions they never had a chance to influence.

Yet, while billions of euros in EU financial assistance are reshaping public infrastructure, energy systems, and education sectors across the region, a critical piece is missing: civil society participation in the programming and prioritization of these investments.

The full integration of civil society organizations (CSOs) in the Western Balkans Investment Framework (WBIF) is not a peripheral issue—it is central to ensuring that EU-supported development is inclusive, accountable, and resilient.

The Scale of EU Support—and the Risk of Democratic Deficit

Between 2021 and 2027, the European Union is expected to channel an estimated €18.2 billion into the Western Balkans through the Instrument for Pre-Accession Assistance III (IPA III) and the newly launched Reform and Growth Facility (RGF).

- IPA III: Approx. €12.2 billion in grants for the region
- Reform and Growth Facility (2023–2027): €6 billion (of which €2 billion are grants and €4 billion concessional loans)

Over 50% of these funds are managed via WBIF, which remains the principal vehicle for financing infrastructure, connectivity, energy transition, and human capital development in the region.

These resources are unprecedented. However, there is a declining trend of the assistance per capita in the WB6 in recent years between the IPA II period and the IPA III. Aid volumes shrank significantly at the beginning of IPA III and have not increased since then. This is largely the reflection of the decision of the Commission to channel a large part of the IPA assistance to multi-beneficiary programmes, notably the Western Balkan Investment Framework (WBIF). Only in the 7th Strategic and Operational Board meetings of the WBIF (24–25 April 2025), it was decided to scaling-up of the Regional Energy Efficiency Programme (REEP)* with additional €90 million from the Instrument for Pre-accession Assistance (IPA III).

The WBIF plays an important role in implementing the Reform and Growth Facility for the Western Balkans, as well as. The financial mechanism will channel €3 billion of grants and loans under the Facility to support priority investments in transport, energy, digital and human capital development. Yet, the projects supported by this mechanism goes as in internal discussions among IFIs, countries and European Commission. The WBIF's current structure does not include any formal or structured participation of CSOs in project programming, neither at the national level through IPA programming nor at the regional level through WBIF governance.

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At the 7th Strategic and Operational Board meetings of the WBIF (24–25 April 2025), Western Balkan governments presented their first batch of projects to be funded under the Reform and Growth Facility. These projects, primarily in the clean energy sector, aim to enhance regional energy system capacity for renewable integration. But no national consultation with civil society was conducted nor have they been involved in any of the sub-structures of the WBIF to be consulted accordingly.

This is a missed opportunity.

Albania and Montenegro: The Front-Runners at a Crossroads

As the two most advanced Western Balkan countries on the accession path, Albania and Montenegro are under the spotlight. With the EU's 2027 timeline in focus, both countries face a dual challenge:

1. Accelerate alignment with EU acquis, particularly in complex sectors such as environment, energy, rule of law, and digital transformation.
2. Build inclusive and participatory institutions capable of sustaining reforms beyond the accession moment.

This is where CSOs are indispensable. They offer not only policy expertise and grassroots knowledge but also perform a critical watchdog role, ensuring transparency, preventing corruption, and reinforcing democratic standards.

Without structured involvement of CSOs in the planning and programming of large-scale investments, there is a risk that development becomes technocratic, donor-driven, and politically disconnected, ultimately undermining the very goals of EU membership.

CSOs add unique value across three dimensions:

- Transparency & Oversight: Independent monitoring of public procurement, environmental standards, and human rights safeguards.
- Public Legitimacy: Enhancing trust in EU investments, especially in rural, marginalized, or politically polarized communities.
- Local Intelligence**:** Ensuring projects respond to real social needs—whether in access to services, energy efficiency, or digital inclusion.

A Missed Opportunity in Current Practice

Despite their demonstrated capacities, CSOs are largely absent from:

- The identification and planning of WBIF-financed investment pipelines.
- Consultations on project feasibility and environmental/social impact.
- Governance fora where strategic investment decisions are made.

Instead, WBIF's operational model continues to prioritize government and financial institution coordination, with no space for structured civil society input before decisions are finalized.

This governance gap stands in contradiction to the EU's own commitments under the Global Gateway strategy, the Green Agenda for the Western Balkans, and the Enlargement Methodology, all of which emphasize inclusive, transparent, and accountable development.

In recent years, WBIF has started consultations with private companies, chambers of commerce on several strategic frames of programs, while the voice and consultations with CSO is totally missing.

A Concrete Proposal: The WBIF Civil Society Facility

To bridge this gap, we propose the establishment of a dedicated WBIF Civil Society Facility**,** operationalized through three core pillars:

1. Structured Participation in the Project Cycle

- CSOs should be consulted at the programming and prioritization stage—not merely after decisions are made.
- Their participation should be formalized in sectors with strong acquis linkages: environment, energy, education, transport, digital.

2. Direct Support for Engagement

- Allocate 1–2% of WBIF annual budgets for:
  - Independent monitoring and citizen audits.
  - Capacity building in CSO policy engagement.
  - Support for regional CSO networks focused on infrastructure, energy, and human capital.

3. Governance and Accountability Tools

- Establish a Civil Society Advisory Board within the WBIF structure.
- Provide observer status for CSOs in WBIF governance meetings.
- Publish an annual WBIF-CSO Engagement Scorecard, co-developed with CSOs, to track participation and identify gaps.

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