

The Missing Link in EU Enlargement – Integrating Regional Civil Society Evidence

Uroš Čitaković

Executive Summary

- > Regional civil society-led initiatives generate substantial evidence on institutional performance, social cohesion, regional cooperation, and administrative capacity across the Western Balkans.
- > Despite the availability of this evidence, it remains structurally disconnected from EU enlargement governance and monitoring processes due to institutional design constraints, weak procedural integration, and the selective political use of evidence.
- > Consequently, the enlargement process risks prioritising formal compliance over implementation realities, while weakening domestic ownership, reform sustainability, and the overall credibility of enlargement policy.
- > This policy brief proposes four measures: introducing regional evidence annexes to Country Reports; embedding learning cycles into enlargement monitoring; institutionalising cooperation with regional civil society actors; and establishing a shared regional evidence repository.
- > Without stronger integration of regional civil society evidence into enlargement governance, the EU risks diminishing returns on its own investment in participatory reforms while further eroding trust among civil society actors in the credibility and inclusiveness of the accession process.

absence of institutional pathways to use it. Implementation-level evidence generated by civil society-led regional cooperation initiatives, systematically collected, EU-funded, and policy-relevant, remains structurally disconnected from the formal enlargement assessment processes, leaving these initiatives largely outside formal decision-making. Country Reports, as the primary instrument for assessing candidate countries' progress toward accession, fail to draw on this evidence base in any systematic way.

Regional mechanisms, such as the Western Balkans Fund (WBF), the Regional Youth Cooperation Office (RYCO), and EU-funded cross-border cooperation (CBC) programs systematically generate policy-relevant evidence on civil society capacities, regional cooperation dynamics, administrative bottlenecks, and social cohesion. Even though these mechanisms and programmes operate sound results-oriented management systems, their outputs lack formal entry points into the enlargement governance architecture designed to assess reform progress. The added value of integrating this evidence into Country Report is concrete: WBF's monitoring, evaluation and learning (MEL) system, for instance, captures multi-country data on civil society capacities for regional cooperation and partnership sustainability, enabling assessments to move beyond government-reported compliance data and to reflect whether participatory and cooperation reforms produce results at the implementation level. Similarly, RYCO data on youth mobility offers proxy indicators relevant to social cohesion that formal *acquis* benchmarks do not measure, but which are directly relevant to the 'Fundamentals First' logic of the revised enlargement methodology (European Commission 2020, 3), which prioritises rule of law, public administration reform, and the quality of democratic governance over technical alignment. Without systematic integration of such evidence, Country Reports risk assessing formal compliance while remaining blind to implementation realities.

This structural gap is particularly visible in the civil society area, where trust and autonomy are constantly challenged. According to the Balkans Barometer 2024, only 32% of

Over the years, EU enlargement governance led to the development of a sophisticated architecture of compliance assessment and benchmarking. Yet a fundamental gap persists and it is not about a lack of evidence, but about the

Western Balkan citizens agree that civil society organizations (CSOs) are autonomous (independent of political influence), while trust in CSOs ranges from 32% to 46% across the region (Regional Cooperation Council 2024, 79, 88). These findings highlight the fragility of civil society and the critical need for amplifying their voices and their involvement in enlargement assessments.

This policy brief examines why this disconnect persists and what can be done to overcome it. It argues that the gap stems not from the lack of quality or availability of evidence, but from the absence of institutional, procedural and political channels for its uptake. High-quality implementation-level evidence, produced by regional cooperation initiatives that are civil society-led and funded by the EU, is systematically collected and available within the supported mechanisms and programmes. Yet, this evidence remains disconnected from the formal enlargement assessments. As research on the Western Balkans confirms, EU accession processes foster increased dialogue without fully institutionalising meaningful participation, with political officials in countries resorting to façade cooperation rather than substantive engagement (Fagan/Wunsch 2019, 607). The mechanisms exist, but the pathways do not.

The policy brief first unpacks the institutional, procedural, political and capacity factors that keep civil society-generated evidence outside the enlargement governance architecture. It then sets out four mutually reinforcing recommendations – formalising regional evidence inputs into Country Reports, creating learning modules within enlargement monitoring, institutionalising cooperation between the Directorate-General for Enlargement and the Eastern Neighbourhood (DG ENEST) and regional civil society mechanisms, and developing a shared regional evidence repository – before concluding by presenting a phased implementation logic and the strategic considerations that make this reform agenda urgent.

A systematic gap explained by institutional, procedural, political and capacity factors

First, the existing enlargement governance architecture does not contain institutionalised focal points for amplifying collected evidence and their integration and subsequent utilization. The system lacks the ‘bridging’ component that would enable those who collect evidence, are able to make sense of it, and benefit from EU funding, to present their analytical outputs. This *institutional* factor prevents DG ENEST from systematically translating findings and transforming them into the assessments that more adequately reflect reality. While EU Delegations in the Western Balkans remain actively involved with CSOs, these interactions remain largely informal and not embedded within the enlargement governance architecture.

Second, the existing enlargement monitoring methodology is centred around *acquis* chapters, political criteria and government-reported data which points to a *procedural* factor. By prioritizing ex-post compliance assessment and focusing only on the fulfilment of benchmarks, this framework provides limited space for systematic incorporation of cross-country comparative data, civil society-generated insights and real state of play from a bottom-up approach. In the absence of procedural channels, existing data and findings remain outside the scope of formal assessment, seriously undermining these processes. It is important to emphasize that regional evidence is selectively utilized. In some sectors, such as trade or economics, there has been some level of integration (e.g., Common Regional Market Action Plan feeds data into Country Reports). However, civil society and social cohesion evidence is underutilized. For example, CBC programmes produce detailed annual implementation reports under Directorate-General for Regional and Urban Policy’s (DG REGIO) monitoring system, but these reports are often not procedurally transmitted to DG ENEST. They thus may not feed into enlargement assessments, even when the data directly relates to governance reform in candidate countries. This cross-directorate fragmentation exemplifies how the EU’s procedural architecture, rather than the quality of the evidence, forms another binding constraint.

The third factor is shaped by *political* considerations that influence both the selection and interpretation of evidence. Evidence generated by civil society and regional programmes often highlights implementation gaps, administrative bottlenecks or governance challenges that may be politically sensitive. As a result, there is a tendency to prioritize data that align with narratives of progress and compliance, while more critical or complex findings receive less systematic attention by both the EU member-states and candidate-country governments. Research on EU conditionality further demonstrates that governments may formally satisfy participation requirements without meaningfully empowering civil society actors, creating forms of window-dressing rather than substantive inclusion (Vidačak 2021, 583). This dynamic affects enlargement evidence governance directly: without institutional safeguards, political selectivity continues to shape which implementation realities ultimately become visible in Country Reports.

This selective use of evidence reflects broader tensions within the enlargement process, where stability and political feasibility can take precedence over comprehensive, evidence-based evaluation. Evidence on inter-ethnic trust and reconciliation, even when methodologically robust, can encounter resistance to formal integration because they create politically inconvenient contrasts with official reform

timelines endorsed by both candidate governments and EU member states seeking regional stability.

Fourth, a *capacity* factor operates on the supply side. Even where channels for uptake exist, regional civil society evidence is unevenly standardised, and this limits its absorption into formal assessment. Fewer than 40% of Western Balkans CSOs apply quality assurance tools and only 20-28% maintain a dedicated MEL function (Vurmo 2025, 17-18), which means that the comparability, methodological transparency, and aggregation the Country Report process would require cannot be taken for granted. The constraint is not the absence of evidence but its heterogeneity: outputs generated to different standards, on different indicators, and at different intervals resist the kind of cross-country synthesis that formal benchmarking depends on. This is why the supply-side problem cannot be solved by individual CSOs reporting directly to EU institutions. Rather, it requires aggregation through regional mechanisms (e.g. WBF, RYCO) able to harmonise and validate inputs before they reach the assessment process.

The combination of these four factors means that even though high-quality, policy-relevant evidence generated through EU-funded programmes exists, it remains invisible to the formal enlargement assessment process. The consequence is a governance system that monitors compliance but misses implementation learning. Without structured integration of regional evidence, the EU risks reproducing a cycle of formal reforms that lack domestic ownership and sustainability, fail to address structural bottlenecks, and ultimately undermine the credibility of the enlargement process itself.

Policy recommendations

To address the gap identified above by tackling its root causes, this section proposes four mutually reinforcing measures: formalising regional evidence inputs into Country Reports through a structured Regional Evidence Annex; creating learning modules within enlargement monitoring; institutionalising cooperation between DG ENEST and regional civil society mechanisms; and developing a shared regional evidence repository.

➤ *Formalize regional evidence inputs into Country Reports*

A new formal component of the Country Report methodology should be developed in the form of a structured 'Regional Evidence Annex'. The lead responsibility for this should lie with DG ENEST in consultation with EU Delegations and regional bodies such as the WBF, RYCO and the Regional Cooperation Council (RCC). This could be tested in a pilot phase in two candidate countries within the 2027-2028

Country Report cycle, with full roll-out across the Western Balkans by 2029.

The expected output of this measure would be a standardised annex appended to each Country Report, summarising implementation-level findings from regional mechanisms across agreed thematic clusters (civil society, social cohesion, administrative capacity). The annex would synthesise implementation-level evidence from civil society-led regional mechanisms and EU-funded programmes, providing a multi-country comparative perspective on civil society capacity, social cohesion, and administrative bottlenecks. This component would involve:

- Developing standardised templates for regional evidence submission, specifying data formats, thematic areas, alignment of indicators and metrics with the EU standards and levels of monitoring and evaluation, and submission deadlines aligned with the Country Report preparation cycle.
- Designing civil society evidence focal points within each EU Delegation, responsible for receiving, reviewing, and synthesising regional evidence inputs.
- Requiring Country Reports to include a Regional Evidence Annex that summarises key findings from regional bodies, with attribution to sources and transparent methodology.
- Conducting an annual consultation between DG ENEST and regional bodies to review evidence integration and identify areas for methodological improvement.

➤ *Create learning modules within enlargement monitoring*

Structured learning cycles should complement compliance assessment by systematically incorporating implementation feedback from regional mechanisms, programmes, and civil society networks.

The lead responsibility for this measure should lie with DG ENEST's Enlargement Strategy and Coordination Unit, with input from EU Delegations and Instrument for Pre-Accession Assistance (IPA) programming authorities. A pilot learning cycle could be launched in alignment with the 2027 Country Report preparation round, with formalised integration into IPA III mid-term reviews by 2028.

The expected output of this measure would be biannual Learning Briefs that translate implementation evidence into specific, actionable reform recommendations – for example, identifying that persistent CSO funding insecurity in Serbia requires targeted IPA III capacity-building measures, or that administrative absorption bottlenecks in Bosnia and Herzegovina call for a re-sequencing of technical assistance

priorities. These learning briefs would feed directly into IPA programming cycles and mid-term reform assessments, creating a structured link between evidence and policy adjustment. These learning modules would shift the focus from ex-post verification to adaptive learning, enabling DG ENEST to identify recurrent bottlenecks, adjust reform priorities, and provide targeted technical assistance. Comparative governance scholarship identifies learning-based mechanisms as particularly relevant, as they can produce EU-oriented reform adjustments that compliance monitoring alone cannot (Radaelli 2008, 241). Those modules would involve:

- Establishing bi-annual learning reviews drawing on regionally aggregated MEL outputs and synthesis reports from WBF, RYCO, and CBC programmes, rather than expecting individual CSOs to report directly to EU institutions. Given that fewer than 40% of Western Balkans CSOs apply quality assurance tools and only 20–28% have a dedicated MEL function within their organisations (Vurmo 2025, 17–18), learning reviews must be designed around regional aggregation as the primary evidence channel.
- Convening multi-stakeholder workshops involving DG ENEST, EU Delegations, national governments, and civil society representatives to discuss implementation findings and identify reform priorities.
- Producing learning briefs that translate implementation evidence into actionable recommendations for mid-term reform assessments and IPA programming.
- Linking learning cycles to the revised enlargement methodology's emphasis on 'Fundamentals First', ensuring that evidence on rule of law, public administration, and civil society capacity informs strategic planning.

➤ ***Institutionalize cooperation between DG ENEST and Regional CSO Mechanisms***

A formal consultative interface between DG ENEST and civil society-led regional bodies should be established, ensuring that CSO evidence is systematically incorporated into enlargement governance and that civil society has a structured voice in the assessment process. Comparative evidence from the Western Balkans demonstrates that civil society empowerment in enlargement contexts is constrained not by NGO agency deficits but by insufficient domestic responsiveness and funding availability – factors that a structured institutional interface can directly address (Wunsch2019, 1134).

The lead responsibility should lie with DG ENEST, with the European External Action Service (EEAS) and the RCC Secretariat as co-facilitators. A formal consultative mandate should be established within existing enlargement package processes by 2027, with the first structured dialogue convened prior to the 2028 Country Report cycle.

The expected output would be an annual structured dialogue report documenting CSO inputs considered, responses from DG ENEST, and explanations of where evidence was or was not incorporated. Critically, to prevent this mechanism from becoming token consultation or being captured by politically aligned actors, the following safeguards must be embedded: (i) participation criteria must be based on thematic expertise and independence from government funding, not organisational size or political proximity; (ii) outputs of the dialogue must be published and cross-referenced with Country Report content; and (iii) CSO participants must be selected through an open, transparent process coordinated by an independent body such as the European Centre for Not-for-Profit Law (ECNL) or a regional civil society network, to avoid selective engagement. This recommendation involves:

- Convening an annual structured dialogue between DG ENEST and regional civil society bodies, focused on evidence integration, reform priorities, and civil society enabling environments.
- Establishing a joint evidence synthesis working group, comprising DG ENEST officials, EU Delegation staff, and civil society representatives, to review regional evidence and identify priority issues for Country Reports. Designating dedicated civil society evidence focal points within EU Delegations, with clear mandates to liaise with regional bodies, collect implementation data, and ensure CSO perspectives are reflected in governance assessments.
- Developing a civil society evidence protocol that specifies how CSO inputs are reviewed, synthesized, and incorporated into Country Reports, with transparency on which evidence is used and why.

➤ ***Develop a regional evidence repository***

A shared, accessible digital repository of regional implementation evidence should be created.

The lead responsibility should lie with the RCC Secretariat as a host institution, with technical support from the European Commission and IPA-funded digital infrastructure grants. The repository architecture and governance framework should be established by end-2027, with the first content population cycle completed by mid-2028 and the link to IPA monitoring systems in place by 2029.

The repository's governance should rest with a multi-stakeholder Oversight Board comprising DG ENEST, EU Delegations, regional bodies (WBF, RYCO, RCC), and civil society representatives which would oversee data quality standards, access rules, and update obligations. Maintenance responsibilities should be assigned explicitly: regional bodies would contribute data annually; DG ENEST would designate a technical focal point; the RCC Secretariat would curate and validate submissions. Access rules should distinguish between open-access aggregate data (publicly accessible) and programme-level raw data (accessible to verified institutional users). Without clear ownership and curation obligations written into the repository's founding mandate, the platform risks becoming a symbolic archive rather than a functioning governance tool.

The expected output would be a live, searchable digital platform enabling DG ENEST, EU Delegations, and national governments to draw on a comprehensive, up-to-date evidence base for enlargement assessments. This repository would serve as a centralised platform for storing, accessing, and analysing evidence from regional mechanisms and programmes.

This recommendation involves:

- Developing standardized data formats and metadata protocols to ensure interoperability and comparability across evidence sources.
- Establishing open access principles, allowing policymakers, researchers, and civil society to access regional evidence for analysis and advocacy.
- Linking the repository to the European Commission's IPA monitoring systems, enabling cross referencing between regional evidence and national-level reporting.
- Updating the repository annually, with contributions from regional bodies, EU-funded mechanisms and programs, and national CSO platforms.
- Promoting the repository through capacity-building workshops for EU Delegation staff, NIPAC offices, and civil society organizations, ensuring that stakeholders are equipped to use the evidence effectively.

Conclusion

The systematic integration of regional civil society evidence into EU enlargement governance is not a technical adjustment, it is a governance reform imperative. Under a

'Fundamentals First' methodology, the EU cannot credibly judge whether rule of law and democratic governance are advancing while excluding the evidence base best able to capture implementation realities.

The Western Balkans present a unique opportunity to pilot evidence integration reforms, given the region's dense network of regional cooperation initiatives, a growing civil society sector, and substantial EU co-investment in evidence generation. The four recommendations in this brief are not parallel, independent measures; they constitute a phased implementation logic: first, formalise the evidence annex and CSO cooperation mechanism to create the institutional architecture (pilot, 2027–2028); second, deploy learning cycles and populate the evidence repository to generate the procedural infrastructure (institutionalise, 2028–2029); and third, scale these mechanisms across the full candidate country group and link them to IPA programming and the annual enlargement package (expand, 2029 onwards). This sequencing matters because without the initial formalisation steps, the learning cycles and repository will lack the institutional legitimacy and data pipelines needed to function.

Two strategic considerations make this reform agenda urgent now. First, civil society trust in the Western Balkans is fragile, and institutional trust is even lower (Regional Cooperation Council 2024): enlargement governance that continues to exclude civil society evidence risks reinforcing perceptions that the EU prioritises formal compliance over genuine institutional transformation (Hoxhaj 2021, 165). Evidence from earlier Eastern enlargement rounds further cautions that purely formal compliance without mechanisms for domestic ownership can entrench elite capture rather than produce genuine institutional change (Vukov 2025, 3071). Second, the EU has already invested substantially in generating regional evidence through mechanisms like WBF, RYCO, and CBC – but this investment yields diminishing returns as long as its outputs remain disconnected from the governance frameworks that shape reform design and resource allocation.

The question the EU must now answer is not whether regional civil society evidence is valuable – that has been demonstrated. The question is whether the EU is prepared to invest equally in the institutional mechanisms needed to integrate it. How it answers this question will not only determine the credibility of individual Country Reports, but also the EU's standing as a governance actor genuinely committed to evidence-based, transformative enlargement.

Further Reading

European Commission. 2020. "Enhancing the Accession Process – A Credible EU Perspective for the Western Balkans. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions". COM (2020) 57 final, Brussels, 5 February 2020.

Fagan, A., & Wunsch, N. 2019. "Fostering Institutionalisation? The Impact of the EU Accession Process on State–civil Society Relations in Serbia". *Acta Politica* 54(4): 607–624.

Hoxhaj, A. 2021. "The EU Rule of Law Initiative Towards the Western Balkans". *Hague Journal on The Rule of Law* 13(1): 143–172.

Radaelli, C. M. 2008. "Europeanization, Policy Learning, and New Modes of Governance". *Journal of Comparative Policy Analysis: Research and Practice* 10(3): 239–254.

Regional Cooperation Council. 2024. "Balkan Barometer 2024: Public Opinion Survey." RCC Secretariat.

Vidačak, I. 2021. "The Effects of EU Conditionality on Patterns of Policy Engagement of Civil Society Organizations in Candidate Countries". *Southeast European and Black Sea Studies* 21(4): 571–592.

Vukov, V. 2025. "European Integration and State Capture: insights from the EU's earlier Eastern Enlargement". *Journal of European Public Policy* 32(12): 3059–3084.

Vurmo, G. 2025. "Western Balkan's CSOs: Turmoil & Opportunities Ahead." Tirana and Sarajevo: CPCD, IDM, CRPM.

Wunsch, N. 2019. "Transnational Learning and Civil Society Empowerment in the EU Enlargement Process". *Journal of Common Market Studies* 57(5): 1123–1139.

About the Author

Uroš Čitaković is a Monitoring, Evaluation and Learning (MEL) Officer and Programme Coordinator at the Western Balkans Fund, specialising in evidence-based governance and EU enlargement processes. His professional work focuses on analysing regional cooperation programmes, civil society development, and the integration of implementation-level data into policymaking frameworks across the Western Balkans.

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