



Evaluation of the EU's engagement with Civil Society in the enlargement, neighbourhood regions and Russia over the period 2007-2018

Final Report

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Acronyms

AA	Association Agreement
AECID	Spanish Agency for International Development Cooperation
AFD	Agence Française de Développement
AAP	Annual Action Plan
ATCA	Anti-Terrorism Clarification Act
ANND	Arab NGO Network for Development
ANP	Armenian National Platform
BIM	Belarus International Implementers Meeting
BASE	Building Accountability and Systems in the Elections
CfP	Calls for Proposals
CEPS	Centre for European Policy Studies
CoTE	Centre of Thematic Expertise
CCRF	Civic Chamber of the Russian Federation
CS	Civil Society
CSDN	Civil Society Dialogue Network
CSF	Civil Society Facility
CSF	Civil Society Forum
CSO	Civil Society Organisation
CPCS	Civil Society Promotion Centre
CFSP	Common Foreign and Security Policy
CoP	Community of Practice
CEPA	Comprehensive and Enhanced Partnership Agreement
CSR	Corporate social responsibility
CBC	Cross-border Cooperation
DCFTA	Deep and Comprehensive Free Trade Area
GiS	Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH
DCI	Development Cooperation Instrument
DG NEAR	Directorate- General for Neighbourhood and Enlargement Negotiations
DG AGRI	Directorate-General for Agriculture and Rural Development
DG DEVCO	Directorate-General for International Cooperation and Development
DG TRADE	Directorate-General for Trade
EaP	Eastern Partnership
EaPTC	Eastern Partnership Territorial Co-operation programme
EUD	EU Delegation
EUTF	EU Emergency Trust Fund for Africa
EUMS	EU Member States
ESC	Euro-Mediterranean Economic and Social Chambers
EMHRN	Euro-Mediterranean Human Rights Network
EESC	European Economic and Social Committee
EED	European Endowment for Democracy
EEAS	European External Action Service
EFI	European Financial Instruments
EIDHR	European Instrument for Democracy and Human Rights
ENPI	European Neighbourhood and Partnership Instrument
ENI	European Neighbourhood Instrument

ENP	European Neighbourhood Policy
ENPARD	European Neighbourhood Programme for Agriculture and Rural Development
EPLO	European Peacebuilding Liaison Office
EUNIC	European Union National Institutes for Culture
EQ	Evaluation Question
GEWE	Gender Equality and Women Empowerment
GSP+	Generalised Scheme of Preferences
GONGO	Government-organised non-governmental organisation
HR/VP	High Representative/Vice President
HR	Human Rights
IcSP	Instrument contributing to Stability and Peace
IPA	Instrument for Pre-Accession Assistance
IDP	Internally Displaced Peoples
IOM	International Organisation for Migration
INGO	International non-governmental organisation
PARJ	Justice Reform Support Programme
LEAP	Lebanese Electoral Assistance Programme
MSF	Maghreb Social Forum
MS	Member State
MENA	Middle East and North Africa region
M&E	Monitoring and Evaluation
ESERE	Economic and Social Empowerment for Roma and Egyptians
PCPA	Multi-Actors Concerted Programmes
MIPD	Multi-indicative strategy papers
NGO	Non-governmental organisation
NSA-LA	Non-State Actors and Local Authorities in Development
PLO	Palestine Liberation Organisation
PNGO	Palestinian NGO Network
PfP	Partnership for Peace programme
PAR-II	Programme d'Appui à la Relance
PASC	Programme d'Appui à la Société Civile
PFM	Public Financial Management
ROM	Results-Oriented-Monitoring
SPRING	Support for Partnership, Reforms and Inclusive Growth
SQ	Survey Question
TA	Technical Assistance
TACSO	Technical Assistance to Civil Society
UGTT	Tunisian General Labour Union
UNDP	United Nations Development Programme
USAID	United States Agency for International Development
WBT	Western Balkans and Turkey
WiLD	Women in Local Democracy
WG	Working Group

Annex 1: Terms of Reference for the evaluation



EUROPEAN COMMISSION

Directorate-General for Neighbourhood and Enlargement Negotiations

FRAMEWORK CONTRACT COM 2015

EuropeAid/137211/DH/SER/Multi

Evaluation of the EU's engagement with Civil Society in the enlargement, neighbourhood regions and Russia over the period 2007-2018

SPECIFIC TERMS OF REFERENCE

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1 MANDATE AND GENERIC OBJECTIVES

The systematic and timely evaluation of European Commission's programmes, activities, instruments, legislation and non-spending activities is a priority.¹ Evaluation exercises aim to demonstrate accountability, to promote lessons learning and to improve policy and practice².

The present evaluation is to provide an assessment of the EU's engagement with Civil Society in the enlargement, the Neighbourhood regions and Russia over the period 2007-2018 against evaluation criteria from the European Commission's Better Regulation Guidelines and the OECD DAC³ (see Annex 5).

The results of the evaluation will be used to:

- Establish results achieved by the European Commission's engagement with Civil Society (CS) in the Enlargement, Russia and Neighbourhood regions over a large period of time (2007 to 2018) and identify the contributing (and hindering) factors,
- Consider those results against the problems and needs the EU's engagement with Civil Society sought to address, resources deployed, as well as instrument and implementation modalities available,
- Measure the extent to which strategic orientations and principles were operationalised within the design, implementation and monitoring of the EU's engagement with Civil Society – within political dialogue and financial support,
- Identify areas of improvement for future policy orientations and guidelines, as well as the future programming of engagement for the remaining period of the 2014-2020 Multi-annual Financial Framework and for the future one.

The evaluation does not aim to lead to any legislative or policy changes.

2 EVALUATION RATIONALE AND SPECIFIC OBJECTIVES

This evaluation is a thematic-level one, looking at the EU's engagement with Civil Society. It will be based on the assessment of a selection of interventions cutting across countries and sectors, in enlargement, neighbourhood regions and Russia.

Several studies with findings covering the EU's engagement with Civil Society in the Neighbourhood and/or Enlargement regions were produced recently⁴. The present evaluation is to build on those exercise and cover gaps (see Section 4.2). Notably, considering that engagement with Civil Society in the 'Neighbourhood East' region and Russia has not been the subject of any specific regional-level evaluations in recent years, more data

¹ EU Financial Regulation (art 27); Regulation (EC) No 1905/2000; Regulation (EC) No 1889/2006; Regulation (EC) No 1638/2006; Regulation (EC) No 1717/2006; Regulation (EC) No 215/2008; SEC(2007) 213 "Responding to Strategic Needs: Reinforcing the use of evaluation"; Better regulation package.

² COM (2011) 637 "Increasing the impact of EU Development Policy: an Agenda for Change"

³ <http://www.oecd.org/dac/evaluationofdevelopmentprogrammes/daccriteriaforevaluatingdevelopmentassistance.htm>

⁴ The Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey over the period 2011-2016 (DG NEAR, Unit D5, December 2017); Thematic evaluation of the EU's support to Civil Society in the Western Balkans and Turkey (DG ELARG, April 2012); Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South over the period 2012- 2016 (DG NEAR, Unit B2, May 2017); Mid-term review report of the External Financing Instruments and accompanying SWDs and evaluations of relevant instruments, namely EIDHR, ENI, IPA II (they contain findings on support to Civil Society); Final evaluation of the Programme "Non State Actors and Local Authorities" over the period 2007-2013 (EuropeAid's Joint Evaluation Unit, December 2013).

collection and analysis resources should be dedicated to those areas in comparison to the other two (Neighbourhood South, Western Balkans and Turkey) for which findings already exist.

2.1 Specific objectives

The assessment will be made against the following evaluation criteria: relevance, effectiveness, impact, coordination, complementarity and coherence, efficiency and EU added value. It will look in particular at

- The proper targeting of the EU's engagement with Civil Society, including outreach and diversification questions,
- The results of the EU's engagement with Civil Society – in terms of changes supported - over time and against the Commission's strategic objectives, overall and adapted to the three regions (Neighbourhood East, Russia, South and candidates and potential candidates for enlargement),
- The extent to which differences in approaches and policy frameworks across the regions influenced those results, as well as other explanatory factors,
- The level of coherence, coordination and complementarity of instruments (geographical and thematic) available to the EU to engage with Civil Society, and its delivery at bilateral and regional levels,
- The extent to which certain principles were applied in practice, e.g. mainstreaming support to Civil Society within sectoral support.

The evaluation should draw lessons from experience since 2007. The evaluation should also produce recommendations for future programming and policy purposes.

2.2 Evaluation users and stakeholders

Staff at DG NEAR, DG DEVCO and the EEAS as well as staff in EU Delegations, as well as beneficiaries and partners of the EU's various forms of engagement with Civil Society (CSOs, partner authorities, implementing authorities) as well as other donors, will use the results of the evaluation. Further detail is provided under Section 6.1.

3 BACKGROUND

3.1 Broad strategic policy framework

3.1.1 Pre 2012 Commission Communication "The roots of democracy and sustainable development: Europe's engagement with civil society in external relations"

Over the first part of the evaluation period, as of 2007, civil society support **in Neighbourhood countries** was primarily provided through the thematic programme "Non-State Actors and Local Authorities in Development" (NSA- LA)⁵. NSA-LA was an "actor-oriented" programme implemented mainly through Calls for Proposals managed by EU Delegations, and aimed at capacity-building through support to initiatives from Non-State Actors (NSA) and Local Authorities (LA) and their associations, and originating from the EU and partner countries. As regards Non-State Actors, the objective of the budget line was to promote an inclusive and empowered society in partner countries that will facilitate NSA and LA participation in poverty reduction and sustainable development strategies.

In the Enlargement region, dialogue with civil society has always been an integral part of the Enlargement policy. As of 2008, financial support to civil society was provided through the Civil Society Facility (CSF) with the objective of strengthening participatory democracies by anchoring democratic values and structures, respect

⁵ Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions, The Thematic Programme "Non-state Actors and Local Authorities in Development", Brussels, 25.1.2006, COM(2006) 19 final.

for human rights, social inclusion and the rule of law in the societies of the partner countries and thereby support their EU integration process.

3.1.2 Post 2012 Commission Communication

The 2012 Commission Communication "The roots of democracy and sustainable development: Europe's engagement with civil society in external relations"⁶ was the first EU, strategic-level document to provide a strategic framework for its engagement with CSOs giving due consideration to country-specificities, particularly in highly volatile political contexts. The Communication put forward three priorities for EU support: (1) to enhance efforts to promote a conducive environment for CSOs in partner countries, (2) to promote a meaningful and structured participation of CSOs in domestic policies of partner countries, in the EU programming cycle and in international processes, (3) to increase local CSOs' capacity to perform their roles as independent development actors more effectively.

Moreover, the 2012 Communication brought the recognition – shared unanimously by EU Member States – that CSOs are governance actors in their own right. By articulating citizens' concerns, CSOs active in the public arena further pluralism and participatory democracy.

Recognising also that CSOs ought to be given the opportunity to act on the same footing as partner governments, the Communication sought to translate its political objectives into support to three broad areas (1) support to an enabling environment, (2) the protection of CSOs participation space and support to their engagement in policy dialogue (3) the development of capacities of CSOs. The Communication applies to the Commission's actions in the Neighbourhood and to the Enlargement region. It also introduced a shared definition of the scope of CSOs agreed by the EU Member States. According to this broad definition, CSOs include "all non-state, not-for-profit structures, non-partisan and non-violent, through which people organise to pursue shared objectives and ideals, whether political, cultural, social or economic. Operating from the local to the national, regional and international levels, they comprise urban and rural, formal and informal organisations. These include membership-based, cause-based and service-oriented CSOs. Among them, community-based organisations, non-governmental organisations, faith-based organisations, foundations, research institutions, Gender and LGBT organisations, cooperatives, professional and business associations, and the not-for-profit media. Trade unions and employers' organisations, the so-called social partners, constitute a specific category of CSOs".

In parallel, the EU made a commitment to integrate human rights principles into EU operational activities for development, otherwise known as following a rights-based approach (an RBA)⁷, as outlined in the 2012 EU Strategic Framework on Human Rights and Democracy with a 2012 - 2014 Action Plan. In the Action Plan on Human Rights and Democracy for the period 2015-2019 and in the new European Consensus on Development, the EU also reiterated its commitment to a RBA with specific actions to integrate an RBA into all EU development instruments and activities⁸.

Since 2012, the EU has repeatedly reiterated its commitment through a series of policies that have externalities on civil society policy (e.g. the EU Global Strategy and Gender Action Plans which have generated opportunities for civil society engagement). Following the commitment in the 2012 Commission Communication, 15 Delegations in the Neighbourhood region and Russia, have elaborated their 'Country Roadmaps for EU Engagement with Civil Society'. These Roadmaps present a comprehensive, coherent and shared analysis of EU and Member States of the civil society landscape, its enabling environment as well as the obstacles, constraints and opportunities faced by civil society organisations (CSOs). The Roadmaps were adopted, following comprehensive consultations with civil society and enhanced dialogue with Member States, and are an important tool to guide the EU engagement with civil society at country level. In most of the countries, the Roadmaps cover the period 2014-2017 and are in the process of being updated for the period 2018-20. The Roadmaps also identify EU priorities and concrete steps for engaging with and supporting CSOs in partner countries, aimed at contributing to concrete gains on synergies and ultimately to collective impact. Differences in the level of

⁶ 2012 Communication "The Roots of Democracy" (EC, 2012) COM (2012) 492, 12.09.2012
<https://eeas.europa.eu/sites/eeas/files/2012-communication-roots-of-democracy-and-sustainable-development.pdf> ⁷
https://ec.europa.eu/europeaid/sectors/rights-based-approach-development-cooperation_en

⁸ https://ec.europa.eu/europeaid/sectors/rights-based-approach-development-cooperation_en

advancement of EU engagement with Civil Society between the Neighbourhood East (and Russia) and South regions exist and come across in the Roadmaps.

In the Enlargement region, in 2013, the 2014-2020 Guidelines for EU support to civil society in enlargement countries of DG Enlargement⁹ were developed and adopted, representing the main strategic policy framework for engagement with and support of civil society in the Enlargement region. They translate the political objectives of the Enlargement strategy into a concrete “results’ framework”, aiming to ensure consistency between policy and support and to feed into programming of IPA II support, policy dialogue and country reports.

3.2 Engagement with Civil Society in the Neighbourhood and in Russia

With the European Neighbourhood Policy (ENP, 2004) and its subsequent reviews (2011 and 2015¹⁰), the EU recognised the evolving role of civil society in the Neighbourhood region and committed to diversifying outreach to CSOs. An important part of the EU's policy towards civil society support is reflected in its reactions to crises in the Neighbourhood region since 2011, both in the Eastern and Southern regions, as reflected in the ENP reviews, other strategic level commitments and operational initiatives.

The ENP review of 2011 outlined a new approach towards EU's neighbours, based on mutual accountability and a shared commitment to respecting universal values, international human rights standards, democracy and the rule of law. Acknowledging civil society's role to contribute to policy-making and hold governments to account, this Communication proposed the establishment of a Civil Society Facility to provide funding for civil society actors. The overall objective of the Neighbourhood Civil Society Facility has been to strengthen and promote civil society's role in reforms and democratic changes taking place in Neighbourhood countries, through increased participation in the fulfilment of Neighbourhood Policy objectives.

The Facility pursues the following specific objectives:

- To strengthen CSOs capacities to promote reform and increase public accountability, including to increase the understanding and knowledge by CSOs of EU (ENP) policy instruments and programmes, new aid modalities, EU procedures and improving CSO's technical skills to respond to calls for proposals;
- To strengthen CSOs' involvement in the policy-making process and in policy dialogue; to strengthen CSOs' role as watchdog players; to increase interaction between CSOs and authorities at the regional, national and local levels;
- To increase CSOs involvement in programming, implementation and monitoring of EU support and policies in the region, in particular to facilitate civil society actor's participation in (selected) sector policy dialogues between the EU and the partner countries;
- To support CSOs' role in local development.

The 2015 ENP review recognised that Civil Society engagement was key to achieving the objectives of the Neighbourhood Policy and included the following commitments: to (1) further expand the EU's outreach to CS in its broadest sense, including to social partners, (2) increase support to the European Endowment for Democracy (EED) and capitalise on EED's experience with "shrinking spaces", (3) further support Civil Society fora with a view to more structured dialogue at both national and regional levels and (4) build the capacity of Civil Society professionals further, including through Civil Society Fellowships.

Through the above mentioned specifically created Civil Society Facility, significant support was allocated to strengthening CSO capacities to promote reform and increase public accountability, to increasing the understanding and knowledge by CSOs of EU (ENP) policy instruments, programmes and procedures and improving CSO's technical skills. Both in the Neighbourhood South and East, this has included regional support programmes, as well as national support financed from the bilateral cooperation programmes where a certain percentage of the total financial support (about 5%) has been earmarked for complementary civil society support.

¹⁰ Joint Communication, JOIN(2015) 50 final, Review of the European Neighbourhood Policy, http://eeas.europa.eu/archives/docs/enp/documents/2015/151118_joint-communication_review-of-the-enp_en.pdf

As regards the **Eastern Neighbourhood**, through the 2011 Review the European Commission recognised for the first time the Eastern Partnership Civil Society Forum as the entity to channel structured dialogue with civil society.

Rapid changes in Neighbourhood East's political environment occurred as of 2014, notably with the 2014 Euro Maidan events in Ukraine, political changes in Moldova throughout 2015, the possible opening to engage more in Belarus, and shrinking space in Azerbaijan. The EU recognised also that the appropriateness of the EU's response to crisis situations was enriched by accurate and timely inputs from CSOs. To meet this objective, CSOs were encouraged to improve communication around their work and become more assertive governance actors.

The 2016 Joint Staff Working Document 'Eastern Partnership – Focusing on key priorities and deliverables'¹¹ set targets for the outreach of capacity development programmes in partner countries and for the quality and inclusiveness of the dialogue with the Eastern Partnership Civil Society Forum and its National Platforms. It also set the objective of engaging civil society in all priority sectors of cooperation between the EU and partner countries, including within work on all twenty Deliverables in the EaP¹².

Russia was included under the geographical instrument ENPI from 2007 to 2013 and is since 2013 included under the Partnership Instrument. CSOs in Russia have also received support via the European Instrument for Democracy and Human Rights and the Civil Society Organisations-Local Authorities programme. A key counterpart has been the EU-Russia Civil Society Forum created in 2011.

EU sanctions against Russia over the Ukraine crisis excluded civil society (and cross-border cooperation) and the March 2016 Foreign Affairs Council identified support to civil society and people-to-people contacts as one of the five principles guiding EU policy towards Russia. Discussions with EU Member States resulted in joint "Guidelines on Practical actions by the EU and the Member States to Support Russian Human Rights Defenders and Civil Society".

As regards the **Southern Neighbourhood**, changes encountered since the Arab Spring have notably highlighted the greater need for an enabling environment for civil society.

Since 2014, a Neighbourhood South Civil Society Forum has been held annually in order to create mechanisms and strengthen regional policy dialogue between the EU and civil society. A recently created regional hub for structured dialogue has received support since early 2018, enabling civil society to organise and co-ordinate advocacy and consultation efforts to feed into more systematic dialogue between CSOs from the region and EU Institutions.

3.3 Engagement with Civil Society in the Enlargement region

In the Enlargement region, the EU has been committed to ensuring the involvement of civil society in the approximation to EU standards and accession negotiations. Candidates and candidate countries face a range of challenges, especially in fields such as the rule of law, corruption, organised crime, the economy and social cohesion. CSOs have an important role to play in addressing those challenges, as well as in the general pre-accession process. Engagement with civil society within enlargement policy focused on enabling and stimulating participatory democracy and aimed to develop an environment conducive to civil society activities and build the capacity of CSOs to be effective and accountable independent actors.

To this end, in 2008, the Civil Society Facility (CSF) was set up to support the development of civil society, comprising both national and regional initiatives which are programmed in a coordinated manner. Since 2011 it has been brought under a single Financing Decision, bringing together all support to civil society in the IPA region available under national and multi-beneficiary programmes. Through the Civil Society Facility (CSF), the EC is channelling its substantive financial support to support the development of civil society. Between 2007-

¹¹ SWD(2016) 467 final, https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/near-eeas_joint_swd_2016467_0.pdf

¹² https://eeas.europa.eu/headquarters/headquarters-homepage/28117/eu-revises-20-key-deliverables-2020-eastern-partnership_en

2013 IPA has devoted more than €150 million for the support of civil society, almost 2% of IPA I. Overall support to civil society under IPA II has been significantly increased. In fact, for the period 2014-2020, 3.5% of IPA II (around € 400 m) has been earmarked to support the development of civil society and media.

The specific objectives of the CSF include fostering an enabling legal, policy and financial environment for CSOs, improving CSOs-Governments relations, as well as supporting CSOs in their efforts to become more effective, more financially sustainable and to increase their capacity, transparency and accountability.

As mentioned above, in 2013, the 2014-2020 Guidelines for EU support to civil society in enlargement countries of DG Enlargement¹³ were developed and adopted, representing the main strategic policy framework for engagement with and support of civil society in the Enlargement region. They translate the political objectives of the Enlargement strategy into a concrete “results’ framework”, aiming to ensure consistency between policy and support at both multi-country and national level. This is also supposed to improve monitoring of performance and results while its findings feed into programming of IPA II support, policy dialogue and country reports. The Guidelines focus on three main areas: (1) Conducive environment (2) Changing relations CSOs and government (3) CSOs capacities. Through a participatory process, different indicators, targets and benchmarks were developed. A yearly monitoring takes place at country level involving CSOs, governments and EU Delegations.

In the Enlargement context, countries aiming to become EU members have to fulfil the so called Copenhagen criteria. The enabling environment for civil society is part of the (Copenhagen) political criteria, more specifically the “democracy” part. This is assessed on a yearly basis in the Enlargement Package (comprised of Enlargement Strategy and Country Reports). The 2015 Enlargement Strategy 2015 states that that an empowered civil society is part of any democratic system and emphasises that: *“A stronger role for civil society organisations and a much more supportive and enabling environment to foster their development is needed in the enlargement countries. This is necessary to enhance political accountability and promote deeper understanding of accession related reforms”*

The 2016 implementation report of the Enlargement Strategy highlights that *“a stronger role on civil society and stakeholders more broadly remains crucial”*. In addition, the yearly Country Reports assess each country's progress in terms of enabling environment for civil society.

3.4 Forms of EU engagement with Civil Society

Targeted support has included strengthening CSOs' capacities, support to platforms¹⁴ and thematic networks. Geographical instruments (IPA and ENI) provide targeted support to CSOs through regional and national envelopes including technical assistance to strengthen CSO's capacities, support to national and international platforms (e.g. EaP Civil Society Forum), regional thematic networks of CSOs or support to local community-based CSOs and grass-root organisations.

In addition to geographic instruments, thematic instruments have provided financial support to CSOs. The Civil Society Organisations – Local Authorities (CSO-LA) instrument (its predecessor is the NSA-LA) provides support at country level to enhance CSOs and LAs’ contributions to governance and development processes. The second is the European Instrument for Human Rights and Democracy (EIDHR) which has also provided support to CSOs (and to individual Human Rights Defenders) for specific actions in line with EU priorities on human rights and democracy.

Over time, the Commission has also increasingly introduced the **mainstreaming of support** to Civil Society within its sectoral cooperation, (e.g. in the fields of health, rule of law, environment, energy, youth). 'Mainstreamed' civil society engagement involved, for example, engaging CSOs within the fight against HIV- AIDS, or seeking their improved access to policy-making- related information, or supporting CSOs' input and participation in the identification of policy priorities or in the implementation of domestic policies and programmes. EU funding for CSOs under sector programmes typically aims at enhancing the role and capacities of CSOs in the respective sector (e.g. the ability to produce evidence-based data) with a view to ensuring that domestic policies and EU's support meet citizens' needs.

¹³ https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/civil_society/doc_guidelines_cs_support.pdf

¹⁴ E.g. EaP Civil Society Forum.

With regards **political support and dialogues**, in the Neighbourhood region, the EEAS and DG NEAR work jointly to roll-out the ENP review with respect to civil society and also to conduct Human Rights dialogues¹⁵. In the case of Russia, the EEAS and DG NEAR have worked closely, also with Member States, to implement actions related to civil society and people-to-people contacts in line with the March 2016 Council conclusions.

In order to operationalise the Rights-Based Approach, the Commission adopted in 2014 a "tool-box-a Rights-Based Approach, encompassing all human rights for EU development cooperation". Some of the guiding working principles of a RBA, such as "enabling participation in decision making processes", "transparency and access to information", are intended to influence EU engagement with civil society, while CSOs themselves have increasingly been expected to apply this methodology in order to be selected for EU funding¹⁶.

For the Enlargement Countries, governments' engagement with civil society remains an essential part of the accession process. Political and policy dialogues are key to ensure that CSOs' views and concerns are taken on board. These can include technical dialogues such as discussion on sector budget support in the Western Balkans as well as international civil society fora in the Eastern and Southern Neighbourhood and with Russia providing space for dialogue between EU and civil society on issues of common concern.

As regards **implementation modalities**, over the last years DG NEAR has scaled up its efforts to use the broadest possible range of different funding modalities to diversify and enhance outreach to civil society organisations with different levels of managerial, technical and advocacy capacities.

Support to civil society has been provided through short-, medium- and long-term action grants, framework partnership agreements (FPAs), operating grants, direct grants to international organisations and CSOs, technical assistance (implemented through both service and grant contracts) and the financing of networking visits (IPA P2P programme).

Attention to Civil Society is also included within Budget Support operations ongoing in 14 countries in the Neighbourhood and Enlargement regions¹⁷. The annual assessment of Budget Support Risk Management Frameworks (RMF) notably covers civil society's ability to contribute to a pluralistic society and to exercise their oversight and accountability role, as well as the level of inclusiveness of public processes. Under some Public Administration Reform programmes, indicators for the release of variable tranches have related to CSO participation. CSOs can also be included within sector coordination structures or in the design, implementation and oversight of policies supported (funds can be reserved for CSO involvement (e.g. TA for CSOs or grant programmes to engage them within reform processes)). In some countries in the neighbourhood region, budget support has been or is on hold due to concerns in the area of CSO freedom.

The Mid-term review report of the External Financing Instruments and accompanying Staff Working Documents¹⁸ and evaluations of relevant instruments, namely ENI, IPA II, EIDHR contain a number of further relevant findings on the various forms of the EU's engagement with Civil Society.

4 EVALUATION SCOPE

4.1 Legal and thematic scope

The definition of the scope of CSOs which should guide the evaluation approach is provided in the European Commission's 2012 Communication "The roots of democracy and sustainable development: Europe's

¹⁵ https://eeas.europa.eu/topics/human-rights-and-democracy_en?page=1

¹⁶ Brussels, 30.4.2014 SWD(2014) 152 final Commission staff working document tool-box a rights-based approach, encompassing all human rights for EU development cooperation

¹⁷ Morocco, Tunisia, Algeria, Egypt, Jordan, Azerbaijan, Armenia, Georgia, Moldova, Ukraine, Montenegro, Kosovo, Albania and Serbia.

¹⁸ https://ec.europa.eu/europeaid/mid-term-review-report-external-financing-instruments_en

engagement with civil society in external relations"¹⁹. The definition is broad; the Communication indicates that CSOs include "all non-state, not-for-profit structures, non-partisan and non-violent, through which people organise to pursue shared objectives and ideals, whether political, cultural, social or economic. Operating from the local to the national, regional and international levels, they comprise urban and rural, formal and informal organisations. These include membership-based, cause-based and service-oriented CSOs. Among them, community-based organisations, non-governmental organisations, faith-based organisations, foundations, research institutions, Gender and LGBT organisations, cooperatives, professional and business associations, and the not-for-profit media. Trade unions and employers' organisations, the so-called social partners, constitute a specific category of CSOs".

Considering that the EU's engagement with Civil Society in the enlargement, neighbourhood regions and Russia over the period 2007-2018 has been provided through political and policy dialogue and financial support at country and multi-country level, the evaluation will cover:

- financial support provided over the period 2007-2013 through the thematic instruments EIDHR and NSA-LA and the geographical instruments ENPI and IPA, and over 2014-2018 through the geographical instruments ENI and IPA II and the global thematic instruments EIDHR and CSO-LA (DCI). The evaluation should help establish to what extent other instruments, e.g. the Instrument contributing to Stability and Peace (IcSP) have been used to fund support to Civil Society in both regions.
- Policy-level engagement conducted by Commission services and the EEAS (since 2011), at headquarters and in the field through EU Delegations. This concerns policy dialogue, multi-stakeholder dialogue (e.g. fora) and consultations with CSOs at regional, national and local levels.

Both targeted and mainstreamed support will be covered. Whilst targeted support can easily be identified, this will be harder for mainstreamed support. Reasons for this are provided under Section 6.4.1.

4.2 Geographical and Temporal scope

The evaluation is to cover the period from 2007 to 2018, reflecting the Financing Decision years²⁰.

The geographical scope will be:

- IPA beneficiaries (under IPA I and IPA II²¹);
- ENPI and ENI partner countries (6 under current ENI East and 10 under current ENI South)²²;
- Russia.

The evaluation should build on findings from the following studies amongst others (please also refer to the full list in Annex 1):

- in the Western Balkans and Turkey:
 - the Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey over the period 2011-2016 (DG NEAR, Unit D5, December 2017)²³;

¹⁹ 2012 Communication "The Roots of Democracy" (EC, 2012), EC Staff Working Document "Report on EU engagement with Civil Society in External Relations" (EC, 2017), and Council Conclusions adopted on 19 June 2017.

²⁰ Equivalent to a budgetary commitment 'level 1' or Global commitment level. N+1 rule applies.

²¹ There are 7 under IPA II: Albania, Bosnia and Herzegovina, Kosovo* (*This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence), the former Yugoslav Republic of Macedonia, Montenegro, Serbia, Turkey.

²² ENI East: Armenia, Azerbaijan, Belarus, Georgia, Moldova, Ukraine; ENI South: Algeria, Egypt, Israel, Jordan, Lebanon, Libya, Morocco, Palestine, Syria, Tunisia. With regards engagement with Civil Society in Syria, whilst EU cooperation with Syrian authorities has been suspended since 2011, cooperation with CSOs has been ongoing. No field visits are expected in Syria and Libya. Only desk research is expected to cover those countries.

²³ https://ec.europa.eu/neighbourhood-enlargement/tenders/monitoring-and-evaluation_en

- the Thematic evaluation of the EU's support to Civil Society in the Western Balkans and Turkey (DG ELARG, April 2012);
- in Neighbourhood South: the Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South over the period 2012- 2016 (DG NEAR, Unit B2, May 2017);
- IBF International Consulting in collaboration with NIRAS and STEM-VCR, Evaluation of EU support to civil society in Azerbaijan in 2007 – 2013, June 2016;
- at thematic level: Final evaluation of the Programme "Non State Actors and Local Authorities" over the period 2007-2013²⁴ (EuropeAid's Joint Evaluation Unit, December 2013).

The evaluation should also draw substantially from the Mid-term review report of the External Financing Instruments and accompanying Staff Working Documents²⁵ and evaluations of relevant instruments, namely ENI, IPA II, EIDHR (and DCI, IcSP, PI, CIR to some extent also). Those documents contain numerous relevant findings on the EU's engagement with Civil Society.

It is also worth noting that a Strategic evaluation of EU aid channelled through civil society organisations over the period 2000-2006 was published by EuropeAid's Joint Evaluation Unit in December 2008.

Considering that engagement with Civil Society in the 'Neighbourhood East' region and in Russia has not been the subject of any specific regional-level evaluations in recent years, more data collection and analysis resources should be dedicated to that region in comparison to the other two (Neighbourhood South, Western Balkans and Turkey) for which findings already exist. This requirement is presented in further detail under section 6.2.

5 EVALUATION ISSUES

5.1 Indicative evaluation questions

The evaluation criteria selected for this evaluation are Relevance, Effectiveness, Impact, Coordination, Complementarity and Coherence, Efficiency and EU Added Value²⁶.

The ten indicative evaluation questions presented in this section are structured around those criteria. This section also lists influencing factors to be considered across all evaluation questions as well as some further considerations.

The evaluation framework, which will guide the research process, is to build on those overarching evaluation questions and considerations²⁷. An indicative evaluation framework is to be proposed in the technical offer and further developed during the inception stage. It should 'unpack' the proposed overarching questions and present the method to provide answers to them.

Relevance

1. To what extent have the EU's objectives and approaches to its engagement (policy dialogue and financial support) with Civil Society properly addressed the variety of problems faced by / needs of Civil Society actors in the Neighbourhood regions, Russia and Enlargement over the evaluation period?

²⁴ https://ec.europa.eu/europeaid/sites/devco/files/nsa_la_final_evaluation_report_volume_i.pdf

²⁵ https://ec.europa.eu/europeaid/mid-term-review-report-external-financing-instruments_en

²⁶ In line with the [Commission's 2015 Better Regulation guidelines on evaluations and DG NEAR's 2016 Guidelines on linking planning/programming, monitoring and evaluation as well as well as Annex 5: Evaluation criteria and key methodological issues](#).

²⁷ Guidance is provided under Annex 5: Evaluation criteria and key methodological issues.

The evaluation framework should also cover:

- The evolution, over the evaluation period, of objectives and approaches chosen and of problems and needs;
- the appropriateness of the targeting of engagement activities, including outreach and diversification questions, or choice of implementation modalities,
- differences in forms of engagement in the Enlargement, Neighbourhood regions and Russia, as well as and policy frameworks,
- differences between financial support supporting Civil Society actors directly and mainstreamed financial support within larger sectoral interventions.

Effectiveness

2. What have been the effects of the EU's various forms of engagement with Civil Society in the Enlargement, Neighbourhood regions and Russia? Which changes has EU engagement contributed to and to what extent have those been sustainable / been long-term?
3. To what extent have those effects corresponded to the EU's initial objectives? Which unintended results were produced?

Impact

4. Considering the broad timeline, as well as the variety of other contributing factors and influences, to what extent have the EU's various forms of engagement with Civil Society in the Enlargement, Neighbourhood regions and Russia contributed to (1) increasing CSOs' capacity to perform their roles as independent development actors, (2) promoting conducive environments for CSOs and (3) promoting structured participation of CSOs in domestic policies, in EU programming cycles and internationally?

Answering Effectiveness and Impact questions should consider:

- Positive and negative results,
- Intended and unintended results,
- Long term, medium and short term results,
- Macro (sector) and micro (household, individual) level results,
- Contributing and hindering factors (*this is of key importance*),
- Groups most affected or influenced by the EU's various forms of engagement with civil society (in relation to Relevance);
- The extent to which certain principles were applied in practice, e.g. mainstreaming.

Efficiency

5. To what extent has the scale of resources deployed been justified considering the changes/results produced?
6. To what extent have efficiency gains, or losses, occurred?

Answering the Efficiency questions should consider contributing and hindering factors (*this is of key importance*), including Coordination, complementarity and coherence aspects (see below) such as the variety of EU's forms of engagement (including policy dialogue and financial support), as well as the variety of implementation and management modes and instruments available (geographical and thematic) and how they were used. For example, amongst recent trends, financial support has been provided directly to third parties (as an implementation modality) in order to increase outreach to more grass-roots organisations. Another example is that a number of delegations have pooled CSO-LA and EIDHR country allocations to maximise their use.

Coordination, complementarity and coherence

7. To what extent have the various forms of EU's engagement (including policy dialogue and financial support) with Civil Society in Enlargement, the Neighbourhood regions and Russia were properly coordinated, complementary, led to synergy effects, or were divergent or duplicated each other?
8. What were the comparative advantages of the various forms of engagement with Civil Society?
9. To what extent have the various forms of EU's engagement with Civil Society in Enlargement, the Neighbourhood regions and Russia been coordinated, complementary and coherent with that of EU Member States?

Answering these questions should also consider the following aspects:

- Links between policy work, multi-stakeholder dialogue (e.g. fora) and financial support, including coordination with DEVCO and the EEAS;
- instruments (geographical and thematic) available and used to engage Civil Society,
- levels of delivery of support: at bilateral and regional levels,
- implementation modes available and used.

On the instruments, support to CSOs in Neighbourhood countries was mainly provided via thematic instruments up until the ENP review in 2011 after which the 2007-2013 ENPI and 2014-2020 ENI were used. The evaluation should look at the comparative advantages of using the instruments available, and also at differences in results according to financial instrument used (thematic versus geographical instrument). Finally, the use of other instruments, not traditionally used to support Civil Society, such as the IcSP, could also be looked at.

The question on the level of Coherence, Complementarity, Coordination of the EU's engagement with that of EU Member States is more or less relevant according to region. For example, in the neighbourhood regions and Russia, 'Country Roadmaps for EU Engagement with Civil Society' are adopted by EU Member States also. Answers to this question would feed into the EU Added Value ones.

EU added value

10. To what extent have the various forms of EU's engagement with Civil Society in Enlargement, the Neighbourhood regions and Russia over the evaluation period had characteristics which distinguished it from that of other actors?
11. To what extent could changes, which the EU contributed to, have happened in its absence?

Influencing factors to be considered across all evaluation questions

Alongside the previously mentioned elements to be considered, further elements to be considered when assessing the various forms of the EU's engagement with Civil Society include:

- The 2006 Commission Communication on The Thematic Programme "Non-state Actors and Local Authorities in Development", Brussels, 25.1.2006, COM(2006) 19 final;
- External events such as the 2011 Arab Spring, and the EU's response to it within its engagement with Civil Society;
- the 2011 European Neighbourhood Policy (ENP) review which included an increased focus on Civil Society, Human Rights and Democracy,
- the publication of the 2012 Communication "The Roots of Democracy" (EC, 2012) COM (2012) 492;
- the introduction of a rights-based approach (an RBA)²⁸, as outlined in the 2012 EU Strategic Framework on Human Rights and Democracy and the 2012 - 2014 Action Plan;

²⁸ https://ec.europa.eu/europeaid/sectors/rights-based-approach-development-cooperation_en

- the introduction, in 2014, of the Roadmaps for engagement with Civil Society in the Neighbourhood region and Russia, of the Guidelines for EU support to Civil Society for the period 2014-2020 in the Enlargement region;
- the 2015 ENP review;
- changes in the European Commission's administrative structure: engagement with Civil Society was under the responsibility of thematic units at former DG DEV and AIDCO, and then at DG DEVCO (and none at DG ELARG) up until 2015 and the establishment of DG NEAR and its Centre of Thematic Expertise on Civil Society Support (COTE) providing guidance to EU Delegations and relevant services.

5.2 Recommendations

The results of the evaluation will be used by DG NEAR to feed into reflections on ways to improve its forms of engagement with Civil Society at policy level, in their operationalisation and at the level of the programming of funding. Recommendations will also feed into discussions on post 2020 funding instruments and their use to support Civil Society in in Enlargement, the Neighbourhood regions and Russia.

The evaluation's recommendations should be made both at regional and thematic levels.

As further detailed under section 6.2, recommendations on the EU's engagement with Civil Society over 2007- 2018 in **Neighbourhood East** (Russia excluded) should be provided (alongside the evaluation findings and conclusions) in a stand-alone deliverable **by the end of 2018**. It is important that findings are provided by the end of 2018 so that they can be used for decision-making purposes.

6 CONSIDERATIONS FOR THE EVALUATION METHOD

6.1 Stakeholder consultation

DG NEAR works with EU Delegations, DG DEVCO, other line DGs, the European External Action Service (EEAS) as well as with Member States to engage and support Civil Society in Enlargement, the Neighbourhood regions and Russia. Staff from those institutions and services will therefore be consulted. It is worth noting that DG NEAR, responsible for EU policy on enlargement and the EU's eastern and southern neighbours, was created in 2015 and the EEAS, the European Union's external action service was launched in 2011. Prior to that DG ELARG dealt with enlargement policy and financial support and DGs DEV, AIDCO and RELEX led neighbourhood policy and financial support.

External stakeholders for this evaluation include:

- Actors of civil society which the EU has engaged with to support Civil Society within political and multi-stakeholder dialogues, as well as CSOs that have benefitted from EU financial support. As per the definition in 2012 Communication “The Roots of Democracy” (EC, 2012) COM (2012) 492, actors of civil society include local, national, regional and international ones, comprising urban and rural, formal and informal organisations, membership-based, cause-based and service-oriented CSOs. They also include community-based organisations, non-governmental organisations, faith-based ones, foundations, research institutions, Gender and LGBT organisations, cooperatives, professional and business associations, and the not-for-profit media. Trade unions and employers' organisations, the so-called social partners, constitute a specific category of CSOs. Civil society stakeholders will therefore include national, regional thematic networks of CSOs and international platforms, such as the Eastern Partnership Civil Society Forum, the Balkan Civil Society Development Network, the Human Rights and Democracy Network, the European Endowment for Democracy, the Anna Lindh Foundation, as well as private individuals, such as the Civil Society Fellows.
- National/regional government representatives including National IPA coordinators (NIPAC), National Coordinating Units in ENI countries, National authorities responsible for cooperation/coordination with civil society, Ministry officials, media and other watchdog representatives, Representatives of local governments, etc.
- Relevant international stakeholders, e.g. Council of Europe, other key donors, etc.

The identification of the most relevant stakeholders will be done during the Inception phase. Consultation activities proposed should allow for a broad and proper coverage of stakeholder groups so that the full variety of interests can be taken into account.

In line with the Better Regulation guidelines, and more so considering the subject of the evaluation, the research method should be as inclusive and participatory as possible. This could be done, for example, by capitalising on the events of CSO platforms, Human Rights and Civil Society fora to collect data, and by including feedback loops to countries visited and stakeholders consulted. For example, one Civil Society Forum is scheduled in Early-Mid November 2018 in Brussels. A regional project "EU and South Neighbourhood Civil Society: Enhancing Dialogue" is also planning to organise a series of thematic workshops in the Neighbourhood region South in 2019 around the four following themes – Governance, Security and countering violence, Migration and Economic development and social dialogue - as well national and youth workshops²⁹. The EU-NGO Forum on Human Rights, organised with the Human Rights and Democracy Network, is another opportunity.

²⁹ Information on planned activities will be available this coming June. The choice of consultation activities (e.g. face-to-face interviews, focus groups, survey) should also allow for the collection of detailed data from a broad sample of stakeholders, as well as for triangulation with data collected through desk research.

It is to be noted that up to 6 field visits are also foreseen within this evaluation. A majority should be in the Neighbourhood East region; visits in Neighbourhood South and the Enlargement region should focus on covering gaps between the requirements for this evaluation and what has been achieved under the two recent regional evaluations³⁰. The choice of countries to visit should also pay attention to visits under previous or parallel exercises. Further information is provided under section 4.2.

In accordance with the Better Regulation guidelines, all evaluations require a consultation strategy presenting the scope and objectives of the various consultation activities proposed, the stakeholders to be consulted and how best to do so, as well as timing and language of the different activities proposed.

Finally and considering the subject of the evaluation and the need to protect CSOs in certain contexts, the technical offer should explain how the data collected for this evaluation will be treated with full confidentiality, in accordance with requirements made in Framework Contract Commission 2015.

6.2 More and earlier data collection and analysis for Neighbourhood East and Russia

Considering that two recent evaluations³¹ have provided detailed findings on some of the EU's forms of engagement with Civil Society over the period 2011/2 to 2016 in the Neighbourhood South region and in the Western Balkans and Turkey, those findings will need to be fully exploited within this evaluation. The existence of recent findings, partly covering the needs for this evaluation with regards the EU's engagement with Civil Society in the Neighbourhood South region and in the Western Balkans and Turkey, justifies dedicating fewer resources to primary data collection for those regions.

In comparison, the EU's engagement with Civil Society in the 'Neighbourhood East' and Russia has not been the subject of specific evaluations in recent years³². 'Neighbourhood East' and Russia should thus be the subject of more data collection and analysis efforts. This could mean covering the 'Neighbourhood East' and Russia comparatively more in the selection of interviews, in the evaluation sample and planning for longer field visits. As far as field visits are concerned, the majority should take place in the Neighbourhood East region.

In view of the above, the method proposed in the technical offer should present clearly how resources for data collection and analysis should be distributed across all three regions.

Another important element to note is DG NEAR's need to receive **evaluation findings, conclusions and recommendations on the EU's engagement with Civil Society over 2007-2018 in Neighbourhood East by the end of 2018**. It is important that findings are provided by the end of 2018 so that they can be used for decision-making purposes. To cater for this demand, the phase following the Inception one should be dedicated to collecting and analysing data on the EU's engagement with Civil Society in Neighbourhood East. The deliverable at the end of that second phase should be a Regional report on the EU's engagement with Civil Society over 2007-2018 in Neighbourhood East, including conclusions and recommendations, not exceeding 40 pages. The sequence of evaluation tasks are presented in more detail under section 6.4.

³¹ The Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey over the period 2011-2016 (DG NEAR, Unit D5, December 2017) and the Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South over the period 2012- 2016 (DG NEAR, Unit B2, May 2017).

³² Recent *country-level* evaluations are listed in Annex 1.

6.3 Robustness of findings

As per the Commission's 2015 Better Regulation guidelines on evaluations, evaluations are to be based on the best available evidence (factual, opinion based etc.) drawn from a diverse and appropriate range of methods and sources (**triangulation**).

Not all sources of evidence are equally robust and consideration must be given as to when and how the evidence was collected and whether there is any bias or uncertainty in it. The quality of all primary data collected should be checked by the evaluation's management team before triangulation stage.

Any limitations to the evidence used and the methodology applied, particularly in terms of their ability to support the conclusions, must be clearly explained.

6.4 Method phases

6.4.1 Inception phase and mapping

Clarifying the scope of the evaluation and developing the evaluation method are the key objectives of this phase. The kick-off meeting will be the opportunity to clarify the ISG's expectations for the evaluation.

In order to develop the evaluation framework, the contractor will be expected to review the methods (e.g. sample of projects selected, countries visited, organisations interviewed), evaluation frameworks and findings from recent studies on the EU's engagement with Civil Society in Enlargement, the Neighbourhood regions and Russia³³. The country factsheets and evaluation matrixes of the two most relevant and recent studies should also be reviewed³⁴ since they contain a substantial amount of secondary data to be exploited for the purpose of this evaluation.

The detailed review of existing evidence would allow the contractor to understand the coverage of the different evaluations and identify gaps to be filled, both from the geographical angle (Neighbourhood East and Russia) and thematic angle. The results of this review would then feed into the development of the method, and the evaluation framework and tools. The proposed method should also present how data from recent evaluation reports will best be exploited and how the more detailed coverage of engagement in the Neighbourhood East and Russia will be done.

Within the inception phase, the contractor will also be expected to identify the scope of the EU's engagement with Civil Society over the period 2007-2018 in Enlargement, the Neighbourhood regions and Russia. This would require:

- Developing the portfolio of interventions funded contributing to supporting Civil Society. This would include both targeted and mainstreamed support,

³³ The Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey over the period 2011-2016 (DG NEAR, Unit D5, December 2017); Thematic evaluation of the EU's support to Civil Society in the Western Balkans and Turkey (DG ELARG, April 2012); Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South over the period 2012- 2016 (DG NEAR, Unit B2, May 2017); Mid-term review report of the External Financing Instruments and accompanying SWDs and evaluations of relevant instruments, namely EIDHR, ENI, IPA II (they contain findings on support to Civil Society); Final evaluation of the Programme "Non State Actors and Local Authorities" over the period 2007-2013 (EuropeAid's Joint Evaluation Unit, December 2013).

³⁴ The Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey over the period 2011-2016 (DG NEAR, Unit D5, December 2017); Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South over the period 2012- 2016 (DG NEAR, Unit B2, May 2017).

- Mapping key policy and multi-stakeholder dialogue (e.g. fora) initiatives which have supported CSOs as governance actors.

This scoping work will be draw on information from the Commission's databases (including CRIS), scoping interviews, as well as the review of key strategic, policy-level documents, including relevant evaluations (please see Annex 1 Indicative documentation).

Whilst targeted support provided to CSOs can be identified in dedicated Financing Decisions and extracted from CRIS, mainstreamed support will be harder to identify. Considering that no marker is used systematically in CRIS to identify support with civil society, it will be more challenging to identify the full scope of mainstreamed support and related amounts, as it will require checking Annual Action Programmes and relevant Action Documents for civil society components. The CRIS filter for grants can be used as a first-level filter but some cleaning will need

to be done. Approaches will be discussed at the Kick-off meeting. Appendix 14 "Findings and Recommendations for the CSF Database" of the Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey provides further information on Commission's databases.

Considering the need for DG NEAR to receive evaluation findings, conclusions and recommendations on the EU's engagement with Civil Society over 2007-2018 in Neighbourhood East by the end of 2018, the phase following the Inception one should be dedicated to collecting and analysing data on the EU's engagement with Civil Society in Neighbourhood East.

The inception report should therefore present how the data collection and analysis activities on the EU's engagement with Civil Society in Neighbourhood East, including field visits, will be sequenced in the next phase of the evaluation. The method should also include a proposal of 3 countries to visit in Neighbourhood East and the scope of those visits. The template for the regional report on the EU's engagement with Civil Society over 2007-2018 in Neighbourhood East should also be submitted.

At the end of the inception phase the following should be provided in the Inception report:

- An intervention logic (including diagram);
- The inventory of actions funded and policy initiatives, including a supporting narrative;
- The evaluation framework with EQs, Judgement Criteria, indicators and foreseen sources of information (including recent evaluation reports);
- A detailed method including a separate Consultation Strategy, in accordance with the Better Regulation guidelines;
- The data collection and analysis tools, including:
 - A proposed evaluation sample, i.e.. a sample from the inventory of projects and policy initiatives across the three regions including Russia, which will be analysed in detail in the next phases of the evaluation including in the field visits,
 - a survey questionnaire (if the main target group is local actors, the questionnaire should be translated in Russian, Arabic and/or French),
 - interview guides,
 - the method for the next phase of the evaluation, focused on Neighbourhood East, and which will include both desk and field research activities, a proposed choice of locations for the field visits should also be included³⁵,
 - the template for the regional report on the EU's engagement with Civil Society over 2007-2018 in Neighbourhood East,
 - the regional evaluation matrixes (for example similar to the country evaluation matrixes provided in Appendixes 3 to 10 of the Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey).

³⁵ Taking into account countries visited for the recent regional evaluations and for the other strategic thematic or country level evaluations coordinated by DG NEAR's unit A4.

The Inception Report shall not exceed 30 pages. Some material including research tools may be placed in annexes. It should be presented and discussed at an Inception meeting with the ISG in Brussels at the latest mid- September. Once the report and evaluation approach will have been approved, the next phase should be launched promptly.

6.4.2 Data collection and analysis phase I- Neighbourhood East region

In order to meet DG NEAR's timeline requirement, this phase will combine both data collection and analysis activities on the EU's engagement with civil Society in Neighbourhood East over the entire evaluation period.

The deliverable at the end of this phase – a Regional report on the EU's engagement with Civil Society in Neighbourhood East over 2007-2018 – shall not exceed 40 pages. It will provide complete answers to the evaluation questions, conclusions and recommendations.

A survey to collect data across all three regions could also be launched at the start of this second phase of the evaluation; whereby results for Neighbourhood East could be available for the regional report.

The Regional report should therefore build on:

- Region-specific interviews;
- The review of documents related to the selected sample of policy initiatives and interventions funded in Neighbourhood East over the period 2008-2017 and which have been included within the evaluation sample. For the funded projects, those documents could include Funding Decisions, progress reports, ROM report if available, evaluation reports etc.;
- Field visits. The visits should cover a mix of projects and initiatives included in the evaluation sample as well as additional ones;
- Results from the survey.

The Regional report will be presented and discussed at a meeting with the ISG in Brussels in December 2018. Its final version should be submitted at the latest at the end of the year. This is important since the answers to the evaluation questions, conclusions and recommendations provided will feed into decision-making in early 2019.

6.4.3 Data collection and analysis phase II - Russia, Neighbourhood South and Enlargement regions

This phase will cover the EU's engagement with Civil Society over 2007-2018 in Russia, the Neighbourhood South and Enlargement regions.

This phase will combine desk and field work. A short progress report, with pre-filled regional and country (for Russia) evaluation matrixes, will be submitted at the end of the desk phase. Findings from the field should be presented at the end of the field phase.

The progress report should be submitted at the end of February 2019. Findings from the field would be presented and discussed, at the end of this phase, during a meeting with the ISG in Brussels in March.

6.4.3.1 Desk phase

The first step will be to pre-fill the regional evaluation matrixes on the basis of data and findings from the Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey and the Evaluation of the capacity building initiatives in support of Civil Society in the Neighbourhood South (2012 – 2016) including detailed data in their annexes.

A country evaluation matrix will also be developed to capture engagement with Civil Society in Russia over the entire evaluation period, drawing on existing findings in relevant reports (see Annex 1) and from primary data.

The regional and country (for Russia) evaluation matrixes should be further completed by collecting data from:

- Region specific interviews for each region focusing on the period 2007-2012 and post 2016;
- Russia specific interviews for the entire evaluation period;

- The review of documents related to a number of policy initiatives and interventions funded in (1) Neighbourhood South and Enlargement for period 2007-2011 and post-2016 and (2) in Russia over the entire evaluation period, and which have been included within the evaluation sample.

Once the regional and Russia evaluation matrixes will have been filled in on the basis of above-mentioned desk work, they should be submitted in annex to a short progress report. This short progress report should present hypotheses to test and information gaps to cover in the field visits. It should also present the methodology for the field phase, including proposed locations to visit. The report should also present the synthesis phase and include a proposal for the final structure of the Final report and the Executive summary (see guidance in Annex 3 Overall structure of the final report).

6.4.3.2 Field phase

The field visits in Russia and / or the Neighbourhood South and in the Enlargement regions should be an opportunity to test hypotheses and fill gaps which emerged from the desk phase.

The field visits should cover a mix of projects and initiatives included in the evaluation sample as well as additional ones.

Findings from the field visits should be presented to the ISG in Brussels in March 2019. Issues encountered in the field and alleviating measures taken, and any incidences on the next and final phase of the evaluation, should also be discussed at that occasion.

6.4.4 Synthesis and reporting phase

In the course of the final phase of the evaluation, all of the data collected, including from the survey and any other sources, will be triangulated and analysed in order to finalise the answers to the evaluation questions and develop the conclusions and recommendations.

The draft final report will present the overall assessment, conclusions and recommendations of the evaluation, distinguishing them by region (Neighbourhood East and Russia, Enlargement and Neighbourhood South) and providing thematic-level ones also.

The Final Report shall not exceed 70 pages. Additional material may be placed in annexes, as necessary. The annexes must include an updated Consultation strategy and the list of documents reviewed.

The report will be presented to the ISG during the final meeting towards the end of May 2019.

DG NEAR will publish the Final Report, the Executive Summaries and the annexes on its website. Considering that the report will be publicly available, language should be clear and the report should also be visually attractive, with graphs and diagrams to make research findings as digestible as possible. Guidance is presented at the end of Annex 3 'Overall structure of the final report'.

7 RESPONSIBILITY FOR THE MANAGEMENT OF THE EVALUATION

DG NEAR A4 Unit is responsible for managing and supervising the evaluation.

The progress of the evaluation will be followed closely by an Inter-service Steering Group (ISG) consisting of representatives of DG NEAR, DG DEVCO, and other relevant line DGs.

The ISG will have the following responsibilities:

- Guiding the planning and implementation of the evaluation to comply with quality standards during preparation of the evaluation roadmap, Terms of reference and the inception, desk, field, and synthesis phases.
- Providing input and information to the evaluation manager (NEAR A4) and evaluation team. Mobilise the institutional, thematic, and methodological knowledge available in the various DGs of the Commission that are interested in the evaluation.
- Ensuring quality control on the different draft deliverables. The evaluation manager (NEAR A4) consolidates the ISG comments to be sent to the evaluation team and endorses the deliverables.

- Ensuring a proper follow-up action plan after completion of the evaluation.

To avoid duplication and consolidate communications between meetings, the evaluation team shall communicate with the ISG members via the evaluation manager.

In particular, the ISG will perform a Quality Assessment of the final evaluation report in accordance with the grid presented in Annex 3 of these Terms of Reference (ToRs). The Quality Assessment by the ISG judges the external contractor's final report and its overall process. It is the final "sign off" by the ISG of the contractor's work and includes a judgement on whether key aspects of the work conducted meet the required standards and provides any related comments. Once this process is completed, DG NEAR Unit A4 will decide on the endorsement of the report for distribution to stakeholders and later presentation by the evaluator.

Quality control by the evaluator

The evaluator ensures an internal quality control during the different phases of the evaluation. The quality control ensures that the draft reports comply with the ToRs requirements and meet adequate quality standards before sending them to stakeholders for comments. The quality control ensures consistency and coherence between findings, conclusions and recommendations. It also ensures that findings reported are duly substantiated and that conclusions are supported by the relevant judgement criteria.

8 PROCESS AND DELIVERABLES

The methodology should be based on DG NEAR's guidelines³⁶, the European Commission's Better Regulation guidelines³⁷, the concept of the theory-based impact evaluations on EVALSED³⁸ and, if appropriate, on other methods to measure the impact and the effects of projects.

The basic approach to the assignment consists of four *main phases*. *Deliverables* in the form of reports should be submitted at the end of the corresponding stage. The table below summarises these phases:

³⁶ http://ec.europa.eu/enlargement/pdf/financial_assistance/phare/evaluation/2016/20160812-dg-near-guidelines-on-linking-planning-programming-vol-1-v0.3.pdf

³⁷ http://ec.europa.eu/smart-regulation/guidelines/toc_guide_en.htm

³⁸ http://ec.europa.eu/regional_policy/en/information/publications/evaluations-guidance-documents/2013/evalsed-the-resource-for-the-evaluation-of-socio-economic-development-evaluation-guide

Evaluation phases:	Activities:	Deliverables* and meetings
<u>Inception phase</u> <ul style="list-style-type: none"> Scoping work on the evaluation subject Structuring of the evaluation method and plan 	<ul style="list-style-type: none"> Data collection & inventory (elaboration) First documentary review Preliminary interviews Preparing first draft intervention logic Defining evaluation matrix (JCs, indicators) Development of method for the next phases of the evaluation Inception report writing Quality control 	<p>Inception Report incl.:</p> <ul style="list-style-type: none"> An intervention logic (including diagram); The inventory of actions funded and policy initiatives, including a supporting narrative; The evaluation framework with EQs, Judgement Criteria, indicators and foreseen sources of information (including recent evaluation reports); A detailed method including a separate Consultation Strategy, in accordance with the Better Regulation guidelines; <p>The data collection and analysis tools, including:</p> <ul style="list-style-type: none"> The evaluation sample, a survey questionnaire (if the main target group is local actors, the questionnaire should be translated in Russian, Arabic and/or French), interview guides, the template for the regional report on the EU's engagement with Civil Society over 2007-2018 in Neighbourhood East <p>Meeting(s) with ISG in Brussels with Power point presentation and minutes</p>
<u>Data collection phase I – Neighbourhood East</u> Primary and secondary data collection <ul style="list-style-type: none"> Analysis 	<ul style="list-style-type: none"> Region-specific interviews Desk research on the basis of the evaluation sample Field visits – evaluation sample and beyond Launch of the survey and analysis of results for Neighbourhood East Regional report writing Quality control 	<p>Regional report for Neighbourhood East, with</p> <ul style="list-style-type: none"> Findings by evaluation question conclusions recommendations <p>Meeting(s) with ISG in Brussels with Power point presentation and minutes</p>
<u>Data collection phase I – Russia, Neighbourhood South and Enlargement</u> <ul style="list-style-type: none"> Primary and secondary data collection Analysis 	<ul style="list-style-type: none"> Review of existing findings from recent evaluations Region and country-specific interviews Desk research on the basis of the evaluation sample Field visits – evaluation sample and beyond Presentation of country findings 	<p>Filling-in regional evaluation matrixes and matrix for Russia</p> <p>Progress report for Russia, Neighbourhood South and Enlargement presenting hypothesis to test and gaps to fill in the field, as well as the method for the remaining field visits</p>

<i>Evaluation phases:</i>	<i>Activities:</i>	<i>Deliverables* and meetings</i>
	<ul style="list-style-type: none"> • Progress report writing • Quality control 	<p>Presentation of Country findings and next phase of the evaluation</p> <p>Meeting(s) with ISG in Brussels with Power point presentation and minutes</p>
<p><u>Synthesis phase</u></p> <ul style="list-style-type: none"> • Triangulation of all data collected • Analysis 	<ul style="list-style-type: none"> • Triangulation and analysis of all data collected, including survey results • Drafting of answers to evaluation questions, conclusions and recommendations, • Drafting of executive summary, draft and final reports and annexes • Quality control 	<p>Draft final report and Final report and Executive summary, incl.:</p> <ul style="list-style-type: none"> • Synthesis of methodological steps of the evaluation exercise, including limitations, if any • Findings by evaluation question • conclusions and recommendations • Updated consultation strategy • Completed regional matrixes for Russia, Neighbourhood South and Enlargement and regional report for Neighbourhood East • Executive summary and translations <p>Meeting(s) with ISG in Brussels with Power point presentation and minutes</p>

** Deliverable are indicative may vary depending on the type of Evaluation and dissemination purposes.*

The kick-off meeting is expected to be attended at least by all senior experts, and the following ISG meetings at least by the team leader and at least one other member of the evaluation team.

All reports will be written in English and submitted to DG NEAR evaluation manager according to the timetable in annex 2. The reports must be written in Times New Roman minimum 12 or Arial 11, single spacing.

The Inception report, Regional report for Neighbourhood East, Progress report, and draft Final reports will be delivered only electronically. The electronic versions of all documents will be delivered in both editable (Word) and non-editable format (PDF).

The Final report will also be delivered in 5 hard copies (5 hard copies of the Final Main Report (without annexes) and 5 copies of the annexes).

The Executive Summary (up to 5 pages) will be provided in English, French, Arabic and Russian. The Executive Summary will be available both integrated into the Final Report, and as a separate stand-alone document.

9 THE EVALUATION TEAM

The evaluation team may be composed of the following categories of experts: a) senior, b) medium, c) junior and d) project manager.

Qualifications and skills:

- Education at least Master's degree level (preferably in law, social sciences, political science and research) or alternatively relevant professional experience of minimum 12 years for the senior experts;
- Education at least Master's degree level (preferably in law, public administration, social sciences and research) or alternatively relevant professional experience of minimum 5 years for the junior/medium experts and project manager.

Professional experience:

- a) Senior expert: at least 10 years in evaluation and monitoring of programmes/policies, of which at least 5 years on evaluation of programmes/instruments/policies in relation to Civil Society;
- b) Medium expert: at least 5 years in planning/implementation and/or evaluation and monitoring of programmes/policies in relation to Civil Society;
- c) Junior: at least 3 years in planning/implementation and/or evaluation and monitoring of programmes/policies in relation to Civil Society;
- d) Project manager shall have at least 3 years of expertise in similar positions.

The evaluation team will have to be able to satisfy the highest quality standards. The evaluation team as such is expected to possess:

- Demonstrated knowledge of evaluation methods and techniques and, preferably, of complex policy and strategy evaluations in the field of external relations and development cooperation;
- Demonstrated experience in quantitative and qualitative analytical methods which can evaluate contribution to change;
- Knowledge and expertise in the Civil Society sector in its full diversity, the role of CSOs as governance and development actors, including in shrinking spaces;
- Knowledge and expertise in donors' engagement with Civil Society actors in a variety of contexts;
- Working knowledge of EU Neighbourhood (Russia included) and Enlargement policies and their implementation modalities;
- Knowledge of the EU's institutional framework;

- Demonstrated experience in EU Neighbourhood and Enlargement contexts, especially Neighbourhood East (Russia included), and how CSOs operate in those;
- Excellent working knowledge of English and French languages³⁹. Working knowledge of Russian and Arabic would be an asset⁴⁰.
- Knowledge of the Rights-Based Approach methodology would be an asset.

It is expected that the Team leader will be an expert of category Senior. (S)he should have proven knowledge and expertise on Civil Society and excellent communication, team co-ordination, presentation and proven report writing and editing skills in English. (S)he will have the experience of carrying out at least two complex evaluations as a team leader.

As a minimum 3 senior experts will be involved in the team, including the team leader.

The offer will clearly state the category of each team member and which tasks the proposed team members are supposed to take responsibility for and how their qualifications relate to the tasks. The team coordination and members' complementarity will be clearly described. A breakdown of working days per expert can be provided.

The team members must be independent from the programmes/projects analysed within this thematic evaluation. Should a conflict of interest be identified in the course of the evaluation, it must be immediately reported to the Evaluation manager for further analysis and appropriate measures.

The team will have excellent writing and editing skills. The Contractor remains fully responsible for the quality of the deliverables. Any report, which does not meet the required quality standards, will be rejected.

During the evaluation of offers the Contracting Authority reserves the right to interview by phone one or several members of the evaluation teams proposed.

The Contractor must make available appropriate logistical support for the evaluation team, including travel and accommodation arrangements for each mission, secretarial support, appropriate software and communication means. The evaluation team will need to have the standard equipment such as individual laptops, computer, mobile phones, etc. No additional cost for these items may be included in the offer.

Performance will be assessed by the Contracting Authority throughout the evaluation exercise (and if needed adjustments will be requested, in agreement with the contractor) based on the following criteria:

- Quality of the analysis
- Relations with the Client
- Clear and precise writing
- Methodological skills
- Communication skills and interview capacity
- Flexibility and availability
- Respect of deadlines.

If experts do not deliver the level of quality required, the Contractor will provide, at no additional cost for the Contracting Authority, immediate replacement and/or additional support to meet the appropriate standards.

³⁹ Corresponding to levels C1 or C2 of the Common European Framework of Reference for Languages.

⁴⁰ Corresponding to level B6 of the Common European Framework of Reference for Languages.

By signing the Statement of exclusivity and availability, the expert commits to present his/her CV for a given assignment only with one Contractor, to work exclusively for the given assignment during the days charged to the related Specific contract, to remain available to start and perform the assignment.

10 TIMING

The project implementation is due to start on 16 July 2018. The expected duration is of 16 months.

As part of the technical offer, the framework contractor must adhere to the timetable in Annex 2, and provide their proposed, more detailed schedule within that timetable in terms of "week 1" etc. The contracting authority underlines that the contractor must ensure that the evaluation team is available to meet the demands of this schedule.

11 OFFER FOR THE ASSIGNEMENT

11.1 Technical offer

The total length of the technical offer (excluding annexes) may not exceed 20 pages; a CV may not exceed 4 pages. References and data relevant to the assignment must be highlighted in bold (font minimum Times New Roman 12 or Arial 11).

The methodology submitted shall not contain wording such as, "if time/budget allows," "if the data are available" etc. Should it appear during the process of the evaluation that an activity envisaged in the methodology is impossible or inappropriate to be carried out for any reasons in the interest of the assignment, the change to the methodology as well as its financial impact must be agreed with the Contracting Authority. In most cases, such changes will require an addendum to the contract.

The offer is expected to demonstrate:

- The team's understanding of the ToR in their own words (i.e. their understanding of what is to be evaluated, and their understanding of the subject areas as relevant for this ToR);
- The relevance of the team composition and skills for the work to be undertaken;
- How the team proposes to undertake the evaluation: the evaluation design and challenges, data collection tools and methods of analysis, how the tasks will be organised;
- The level of quality control (content/proof reading/copy editing) which will be applied, at which points in the process and who will undertake it.

11.2 Financial offer

The financial offer will be itemised to allow the verification of the fees compliance with the Framework contract terms.

The per diems will be based on the EU per diem in force when the Requests for Services are launched. The EU per diem is the maximum not to be exceeded.

Offers shall be submitted within the deadline exclusively to this functional mailbox:

NEAR-A4-CRIS-FWC-OFFERS@ec.europa.eu

12 TECHNICAL OFFERS SELECTION CRITERIA

The selection criteria and their respective weights are:

	Maximum
TOTAL SCORE FOR ORGANISATION AND METHODOLOGY	
Understanding of ToR	15
Organisation of tasks (including division of tasks, timing, quality control mechanisms)	10
Evaluation approach, working method, analysis	15
Sub Total	40
EXPERTS/ EXPERTISE	
Team Leader	20
Other senior experts	25
Other (medium/junior) experts	10
Project manager	05
Sub Total	60
Overall total score	100

13 ANNEXES

The contracting authority reserves the right to modify the annexes during the FWC implementation.

ANNEXES

ANNEX 1: INDICATIVE DOCUMENTATION TO BE CONSULTED FOR THE PURPOSE OF THE EVALUATION BY THE SELECTED CONTRACTOR

Indicate a list of relevant documents which can be consulted by the contractor.

Strategic level documents and guidance ones

1. 2012 Communication “The Roots of Democracy” (EC, 2012) COM (2012) 492, 12.09.2012 which lays out the rationale and priorities of the EU's support to civil society in Third countries;
2. COM (2011) 303 - EU Joint Communication on a “New Response to a Changing Neighbourhood”
3. JOIN (2012) 014 final - EU Communication on “Delivering on a new Neighbourhood policy”;
4. JOIN (2015) 50 final - EC Communication on “The Review of the European Neighbourhood Policy”
5. The Country Roadmaps of EU engagement with Civil Society;
6. DEVCO Documents related to the Civil Society Roadmaps
7. Guidelines for EU support to Civil Society in enlargement countries 2014-2020;
8. European Commission Enlargement Strategies;
9. Several guidance documents issued to Delegations by the CoTE: On consulting civil society (7 tips); on mainstreaming civil society into sector actions (with DEVCO A5); on enhancing outreach to civil society

Regional level evaluations

1. The Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey over the period 2011-2016 (DG NEAR, Unit D5, December 2017);
2. Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South over the period 2012- 2016 (DG NEAR, Unit B2, May 2017);
3. Thematic evaluation of the EU's support to Civil Society in the Western Balkans and Turkey (DG ELARG, April 2012)

Country level evaluations

4. IBF International Consulting in collaboration with NIRAS and STEM-VCR, Evaluation of EU support to civil society in Azerbaijan in 2007 – 2013, Letter of Contract N°2014/352705, June 2016

Global thematic or instrument level evaluations

1. Mid-term review report of the External Financing Instruments and accompanying SWDs and evaluations of relevant instruments, namely EIDHR, ENI, IPA II (they contain findings on support to Civil Society);
2. Final evaluation of the Programme "Non State Actors and Local Authorities" over the period 2007-2013 (EuropeAid's Joint Evaluation Unit, December 2013);
3. Strategic evaluation of EU aid channelled through civil society organisations (2000-2006) (EuropeAid's Joint Evaluation Unit, December 2008)

Intervention-level evaluations or reports

4. Socio-Economic Development and Civil Society Support Programme in Egypt - SPRING Component 3, ENPI/2012/024-572; 2017
5. Support to Civil Society and Media in Jordan, 2012/023-849, 2017
6. Increasing civil society participation in national policy dialogue in Armenia, ENPI/2013/334-643, Final evaluation, 2017
7. Evaluation of a deconcentrated programme under civil society, namely "Sivil Düşün, Phases I and II", Turkey, 2017

Other reporting documents

8. Relevant reports of the European Court of Auditors⁴¹;
9. ROM reports. A ROM exercise was conducted for at least 65 contracts categorised under the DAC code "Democratic participation and civil society" (15150);
10. The 2017 Staff Working Document entitled "Report of EU engagement with Civil Society" (SWD(2017) 136/2

List of (indicative) planned or ongoing evaluation or reporting exercises

- Unit B2 of DG NEAR has recently launched an evaluation of the Youth and Culture Regional portfolio. This evaluation will assess the performance of the Med Culture and NET MED YOUTH programmes. It aims at assessing the advantage of regional mechanisms of support against the bilateral cooperation and the importance of sub-granting schemes regarding their comparative advantages, obstacles and lessons learnt. The final report is expected in Mid-June 2018;
- Mid-term evaluation Civil Society Facility in Moldova; the report is due by the end of 2018;
- Final report on Civil Society and Media Facility in Serbia due in May 2018;
- Mid-term Evaluation of the active participation of civil society in the reform process in Lebanon. The report is due by the end of 2018;
- Final evaluation of CSF 2015 in Georgia (OPR grants) due in March 2018 and Midterm evaluation CSF 2015 in Georgia (Action Grant) due in May 2018;
- Court of Auditors' performance audit on a sample of EU funding to CSOs, including to CSOs in one NEAR country - Lebanon. The report is due by the end of 2018.

⁴¹ <http://www.eca.europa.eu/en/Pages/AuditReportsOpinions.aspx?ty=Special%20report&tab=tab4>

ANNEX 2 :TIMING

Column 3 (Dates) of the table below is to be filled by the contractors and submitted as part of their technical offer

<i>Evaluation Phases</i>	<i>Dates</i>	<i>Key deliverables</i>	<i>Dates</i>	<i>Meetings</i>
Kick off				
			Mid-July 2018	Kick Off Meeting with ISG in Brussels
Inception				
	End of August 2018	Draft Inception Report	Early September 2018	ISG Meeting
Data collection and analysis phase I – Neighbourhood East				
	October-mid-November 2018	Field Visits		
	End of November 2018	Draft Regional Report Neighbourhood East	Early December 2018	ISG meeting
	December 2018	Final Regional Report Neighbourhood East		
Data collection and analysis phase II – Neighbourhood South and Enlargement				
	January-Feb. 2019	Desk work		
	End Feb 2019	Progress report		
	Feb - March 2019	Field Visits	March 2019	ISG Meeting presenting findings from field and discussion on final steps
Synthesis				
	April-May 2019	Draft Final Report		
			May 2019	ISG Meeting
	June 2019	Submission Final Report and printed versions		

ANNEX 3: Overall structure of the final report

The overall layout of the **Final report** is:

- A summary (1);
- Context of the evaluation and methodology;
- Evaluation questions and their answers (findings);
- Conclusions (2); and
- Recommendations (3).

Length: the final main report may not exceed 70 pages excluding annexes. Each annex must be referenced in the main text. Additional information regarding the context, the activities and the comprehensive aspects of the methodology, including the analysis, must be put in the annexes.

The evaluation matrix must be included in the annexes. It must summarise the important responses at indicator/ judgement criteria level. Each response must be clearly linked to the supporting evidence. The matrix must also include an assessment of the quality of evidence for each significant finding. The table below presents an example of how the quality of evidence may be ranked. This is purely indicative. The contractor should present a specific approach for assessing the quality of evidence.

Ranking of Evidence	Explanation of ranking of quality of evidence
<i>Strong</i>	The finding is consistently supported by a range of evidence sources, including documentary sources, quantitative analysis and qualitative evidence (i.e. there is very good triangulation); or the evidence sources, while not comprehensive, are of high quality and reliable to draw a conclusion (e.g. strong quantitative evidence with adequate sample sizes and no major data quality or reliability issues; or a wide range of reliable qualitative sources, across which there is good triangulation).
<i>More than satisfactory</i>	There are at least two different sources of evidence with good triangulation, but the coverage of the evidence is not complete.
<i>Indicative but not conclusive</i>	There is only one evidence source of good quality, and no triangulation with their sources of evidence.
<i>Weak</i>	There is no triangulation and / or evidence is limited to a single source.

(1) A summary (maximum 5 pages)

The summary of the evaluation report may not exceed 5 pages (3.000 words). It should be structured as follows:

- a) 1 paragraph explaining the objectives and the challenges of the evaluation;
- b) 1 paragraph explaining the context in which the evaluation takes place;
- c) 1 paragraph referring to the methodology followed, spelling out the main tools used (data on the number of projects visited, number of interviews completed, number of questionnaires sent, number of focus groups conducted, etc.);
- d) The general conclusions related to sectorial and transversal issues on one hand, and the overarching conclusion(s) (for example on poverty reduction) on the other hand;

- e) A limited number of main conclusions should be listed and classified in order of importance; and
- f) A limited number of main recommendations should be listed according to their importance and priority. The recommendations have to be linked to the main conclusions.

The chapters on conclusions and recommendations should be drafted taking the following issues into consideration:

(2) Conclusions

- The conclusions have to be assembled by homogeneous "clusters" (groups). It is not required to set out the conclusions according to the evaluation criteria.
- The general conclusions related to sectorial and transversal issues and the overarching conclusion(s) (for example on poverty reduction).
- Specific conclusions on each financial instrument indicated in the ToR section "3.1.1. Legal scope". These conclusions will focus on effectiveness, efficiency, added value, complementarity and synergies with other financial instruments.
- The chapter on conclusions must enable to identify lessons learnt, both positive and negative.

(3) Recommendations

- Recommendations should be substantiated by the conclusions.
- Recommendations have to be grouped in clusters (groups) and presented in order of importance and priority within these clusters.
- Recommendations have to be realistic and operational.
- The possible conditions of implementation (who? when? how?) have to be specified and key steps/action points should be detailed when possible.

Annexes (non-exhaustive)

- National background;
- Methodological approach;
- Evaluation matrix;
- Monograph, case studies;
- List of documents consulted;
- List of institutions and persons met;
- People interviewed;
- Results of the focus group, expert panel etc.;
- Slide presentations in the country/regional seminar and the seminar minutes;
- All data bases constructed for the purpose of the evaluation.

EDITING

The Final report must:

- be consistent, concise and clear;
- be well balanced between argumentation, tables and graphs;
- be free of linguistic errors;

- include a table of contents indicating the page number of all the chapters listed therein, a list of annexes (whose page numbering shall continue from that in the report) and a complete list in alphabetical order of any abbreviations in the text;
 - Contain a summary of maximum 5 pages (or summaries in several linguistic versions when required).
 - Be typed in single spacing and printed double sided, in A4 format.
- The presentation must be well spaced (the use of graphs, tables and small paragraphs is strongly recommended). The graphs must be clear (shades of grey produce better contrasts on a black and white printout).
 - The contractor is responsible for the quality of translations and their conformity with the original text.

ANNEX 4 :Quality Assessment Grid

Concerning these criteria, the evaluation report is:	Unacceptable	Poor	Good	Very good	Excellent
1. Meeting needs: Does the evaluation adequately address the information needs of the commissioning body and fit the terms of reference?					
2. Relevant scope: Is the rationale of the policy examined and its set of outputs, results and outcomes/impacts examined fully, including both intended and unexpected policy interactions and consequences?					
3. Defensible design: Is the evaluation design appropriate and adequate to ensure that the full set of findings, along with methodological limitations, is made accessible for answering the main evaluation questions?					
4. Reliable data: To what extent are the primary and secondary data selected adequate? Are they sufficiently reliable for their intended use?					
5. Sound data analysis: Is quantitative information appropriately and systematically analysed according to the state of the art so that evaluation questions are answered in a valid way?					
6. Credible findings: Do findings follow logically from, and are they justified by, the data analysis and interpretations based on carefully described assumptions and rationale?					
7. Validity of the conclusions: Does the report provide clear conclusions? Are conclusions based on credible results?					
8. Usefulness of the recommendations: Are recommendations fair, unbiased by personnel or shareholders' views, and sufficiently detailed to be operationally applicable?					
9. Clearly reported: Does the report clearly describe the policy being evaluated, including its context and purpose, together with the procedures and findings of the evaluation, so that information provided can easily be understood?					
Taking into account the contextual constraints on the evaluation, the overall quality rating of the report is considered.					

ANNEX 5: Evaluation criteria and key methodological issues

(1) Definitions of the **five OECD-DAC evaluation criteria** can be found at the following address:

<http://www.oecd.org/dac/evaluationofdevelopmentprogrammes/daccriteriaforevaluatingdevelopmentassistance.htm>

(2) **Relevance**: the extent to which an intervention's objectives are pertinent to needs, problems and issues to be addressed.⁴²

(3) **"Coherence"** is used in two different contexts: as an evaluation criterion and as part of the 3Cs (key issues).

i. The definitions of coherence as evaluation criteria:

Coherence⁴³: the extent to which the intervention logic is not contradictory/the intervention does not contradict other intervention with similar objectives

ii. Provisions regarding the 3Cs (key issues):

Development cooperation is a shared competence between the European Community and the Member States. The EU competence on development cooperation was established in law by the adoption of the Maastricht Treaty in 1992. To guide its practical implementation the Maastricht Treaty established three specific requirements: *coordination, complementarity and coherence* – the “three Cs”. These commitments are reaffirmed in the “European Consensus for Development”⁴⁴. The legal provisions with regard to the 3Cs remain largely unchanged in the Lisbon Treaty. They offer basic definitions of the various concepts involved as can be seen in the box below.

Lisbon Treaty

Art. 208 (ex Art. 177 TEC)

1. "Union policy in the field of development cooperation shall be conducted within the framework of the principles and objectives of the Union's external action. The Union's development cooperation policy and that of the Member States complement and reinforce each other.

Union development cooperation policy shall have as its primary objective the reduction and, in the long term, the eradication of poverty. The Union shall take account of the objectives of development cooperation in the policies that it implements which are likely to affect developing countries."

Art. 210 (ex Art. 180 TEC)

1. "In order to promote the complementarity and efficiency of their action, the Union shall coordinate their policies on development cooperation and shall consult each other on their aid programmes, including in international organisations and during international conferences.
2. They may undertake joint action. Member States shall contribute if necessary to the implementation of Community aid programmes.

⁴² Evaluating EU activity - Glossary p.101 (Relevance, p. 108):
http://ec.europa.eu/dgs/secretariat_general/evaluation/docs/eval_activities_en.pdf.

While, according to the DAC Glossary the **relevance** is the extent to which the objectives of a development intervention are consistent with beneficiaries' requirements, country needs, global priorities and partners' and donors' policies. The terms '**relevance and coherence**' as European Union's evaluation criteria cover the DAC definition of 'relevance'.

⁴³ Evaluating EU activity - Glossary p.101 (Coherence: p.102):

http://ec.europa.eu/dgs/secretariat_general/evaluation/docs/eval_activities_en.pdf

⁴⁴ (2006/C 46/01)

2. The Commission may take any useful initiative to promote the coordination referred to in paragraph 1."

Coordination: In EC policy documents the distinction is made between three levels of coordination: (i) policy coordination; (ii) operational coordination and (iii) coordination in international forums.

Complementarity: The obligation to ensure complementarity is a logical outcome of the fact that development cooperation is a shared competence between the EC and the Member States. Over time, the concept was linked to a better distribution of roles between the Commission and the Member States on the base of their respective comparative advantages. This interpretation is also the basis for the Code of Conduct on Complementarity (2007) emphasising the need for a „division of labour“ (DOL) between the various European actors in delivering aid.

Coherence: One such typology distinguishes between (i) coherence/incoherence of European development policy itself; (ii) coherence/incoherence with the partner country's/region's policies; and (iii) coherence/incoherence between development co-operation policies and policies in other fields⁴⁵.

- (4) **Value added of the European Union's interventions:** The criterion is closely related to the principle of subsidiarity and relates to the fact that an activity/operation financed/implemented through the Commission should generate a particular benefit.

There are practical elements that illustrate possible aspects of the criterion:

- 1) The European Union has a particular capacity, for example experience in regional integration, above that of EU Member States.
- 2) The European Union has a particular mandate within the framework of the '3Cs' and can draw Member States to a greater joint effort.
- 3) The European Union's cooperation is guided by a common political agenda embracing all EU Member States.

⁴⁵ In recent years, the concept of „policy coherence for development“ (PCD) has gained momentum, in the European Consensus (2005) PCD was defined as *“ensuring that the EU takes account of the objectives of development cooperation in all policies that it implements which are likely to affect developing countries, and that these policies support development objectives.”* (par. 9).

Principles regarding the drafting of Evaluation Questions

Main principles to follow when preparing evaluation questions (EQ)

- (1) Limit the total number of EQ to 10 for each evaluation.
- (2) In each evaluation, more than half of EQ should cover specific actions and look at the chain of results.
 - Avoid too many questions on areas such as cross cutting issues, 3Cs and other key issues, which should be covered as far as possible in a transversal way, introducing for example specific judgement criteria in some EQs.
- (3) Within the chain of results, the EQs should focus at the levels of results (outcomes) and specific impacts.
 - Avoid EQs limited to outputs or aiming at global impact levels.
 - In the answer to EQs, the analysis should cover the chain of results preceding the level chosen (outcomes or specific impacts).
- (4) EQ should be focused and addressing only one level in the chain of results.

- Avoid vague questions where follow-up questions are needed (questions à tiroirs).
 - Avoid questions dealing with various levels of results (for example looking at outcomes and specific impacts in the same EQ).
- (5) The 7 evaluation criteria should not be present in the wording of the EQ.
- (6) General concepts such as sustainable development, governance, reinforcement, etc. should be avoided.
- (7) Each key word of the question must be addressed in the answer.
- Check if all words are useful.
 - Check that the answer cannot be "yes" or "no".
 - Check that the questions include a word calling for a judgement.
- (8) Every EQ must be accompanied by a limited number of judgement criteria; some of them dealing with cross cutting and some key issues (see point 2 above).
- (9) A short explanatory comment should specify the meaning and the scope of the question.

Annex 2: Findings at judgement criteria level per evaluation question

1. Enlargement region

EQ1 (Relevance): *To what extent have the EU's objectives and approaches to its engagement (policy dialogue and financial support) with civil society properly addressed the variety of problems faced by / needs of civil society actors in the Enlargement region over the evaluation period?*

The underlying strategic document setting out the scene for cooperation with civil society in the Western Balkans is the Strategy for 'A credible enlargement perspective for and enhanced EU engagement with the Western Balkans'¹ adopted by the European Commission as well as the Copenhagen Political criteria for accession after the European Council in Copenhagen in 1993. In the Enlargement region, civil society empowerment remains an integral part of the political criteria for the EU accession process, and especially the role of governments in successfully performing and creating the conducive environment for the sustainable development of civil society, both in terms of securing basic freedoms (like freedom of expression, freedom of assembly, etc.) as well as opening ways for cooperation with civil society. This is recognised in the overarching policy framework for the Enlargement region.

Evidence gathered through document review and stakeholder interviews confirms the capability of the EU to develop its objectives and approaches related to the engagement with civil society to adequately and appropriately address their needs and priorities. Between 2007 and 2018, the EU continuously developed and adapted its objectives and approaches in this regard, while also keeping civil society updated on the rationale of its actions. Within the framework of accession support, the EU's engagement with civil society in the Enlargement region has been ongoing since the early 2000s, with more concrete measures set forth in the Instrument for Pre-accession. Since 2009, support has been provided through the Civil Society Facility as a specific support programme under IPA for civil society, complemented by EIDHR and EU IPA support within different components (e.g. CBC). Another important step forward was the shift to a sector wide approach in the last years of implementation of IPA I, whereby programming of assistance was done by sector, resulting in two important relevance effects: 1) diminishing fragmentation of assistance, and 2) more systematic engagement with civil society through sector working groups. In addition to ensuring a more systematic approach to programming, this evolution increased the relevance of assistance, as the EU took an increasingly more strategic approach towards CSO participation and support as a sector, later on mainstreaming this within overall support. The 2012 Evaluation of EU support to civil society noted that, despite the fact that most of the available CSO support instruments at that time struggled with the quality of intervention frameworks, there was an evolution in terms of relevance of support and more strategic engagement with civil society, increasing thus the relevance of programmed assistance². IPA II brought further evolution of assistance through programming directly to civil society as a sector (e.g. in Turkey³), or within sector programmes such as the EU Integration facility (e.g. in Albania or Serbia).

One of the notable changes in the EU's objectives refers to the sectorial definition of civil society, which appeared only in 2014. With the adoption of **the Guidelines for EU Support to Civil Society in Enlargement Countries (2014-2020)**, not only was civil society promoted as an actor in the identification, planning of implementation and monitoring of IPA II support, but this document also laid down a strategic approach for support for strengthening of civil society *per se*. Finally, the 2018 Communication from the Commission to the EU Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on "A credible enlargement perspective for and enhanced EU engagement with the Western Balkans" reconfirms the importance that civil society plays in the enlargement process in the Western Balkans. It underlines in particular the importance of the enabling environment, the need for inclusive structured dialogue

¹ (2018); Communication from the Commission to the European Parliament, the Council, The European Economic and Social Committee and the Committee of the Regions: A credible enlargement perspective for and enhanced EU engagement with the Western Balkans; Strasbourg, 6.2.2018 COM(2018) 65 final; https://cdn4-eeas.fpfis.tech.ec.europa.eu/cdn/farfuture/qBwfc0RMS_MyvjvHZSpABJwAP2LIW0eoVxqGZtf9_2k/mtime:1518429431/sites/eeas/files/communication-credible-enlargement-perspective-western-balkans_en.pdf accessed on 4 February 2019

² European Commission (2012); Thematic Evaluation of EU's Support to Civil Society in the Western Balkans

³ Annual Action Programme for Civil Society in Turkey, https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/3-ipa_2016_civil_society_ad_-_final_for_ipa_committee_clean.pdf

between civil society and governments on reform priorities, the empowerment of civil society and the inclusion of citizens more broadly⁴.

The EUD has continuously organised consultations with civil society to obtain its input into a more comprehensive programming process. The consultation approach evolved within the reference period of this evaluation, from more erratic and ad-hoc consultations to very systematic consultations and gathering of inputs for EU Progress/Country reports and in preparation of Guidelines for Calls for Proposals under CSF.

There is evidence that the EU's approaches to its engagement with Civil Society properly addressed the problems faced by smaller grassroots organisations, and those outside the capitals within the region. This is increasingly done through sub-granting schemes and interventions combining capacity building and granting support to grassroots organisations (e.g. Sivil Dusun in Turkey, ReLOAD Project, etc.). The EU's interventions also take into account the demand for better dialogue and co-operation between civil society, government and the private sector, which is increasingly becoming a practice within EU support through action and other types of grants.

In Turkey⁵, the EU has been supporting the sector development and dialogue since 2007. The process of EU-integration has suffered setbacks. At the moment of writing this report, it is hard to forecast the future path of the EU-Turkey relationship, and such a situation obviously affects the cooperation with civil society in Turkey. During recent years, particularly following the coup in 2016, when the State of Emergency was introduced and repeatedly extended since then, the respect of human rights and principles of rule of law were seriously affected. Turkey derogated from its obligations foreseen by the European Convention on Human Rights and the International Covenant on Civil and Political Rights, with an increasingly problematic context for civil society work. According to the figures presented in the Indicative Country Strategy Paper for Turkey, at the time of adoption of that document, there were closures of around 1500 CSOs as part of the government's post-coup measures and a more challenging legal environment characterised by more bureaucratic obstacles, in particular relating to their operation, their funding and, in some cases — such as for federations — their legal creation and core issues⁶. In light of a difficult environment for civil society in Turkey, EU's Civil society funding under IPA II has been nearly doubled in the period 2014-2017, to respond to the needs in the sector, also related to the political context. During IPA I and in the first period of IPA II, support to civil society was channelled via the Turkish Ministry of EU Affairs acting as the lead institution in this sub-sector. To respond to an increasingly difficult context, there was a decision that a shift in the management mode for the actions in the field of civil society development needs to be taken and the bulk of assistance directly managed by the Commission inter alia via the Civil Society Facility.⁷

**Judgement
Criterion 1.1**

The EU's objectives with regard to its support to civil society have evolved effectively in line with the needs of civil society actors over this period in the Enlargement region.

Evidence collected through document review and stakeholder interviews (with EUDs across the Enlargement candidates and potential candidates, CSOs, government and other development partners) confirms that the EU's objectives with regard to its support to civil society in the Enlargement region have evolved effectively in line with the needs of civil society actors over the evaluation period. The EU's support to civil society has evolved also in line with updated EU integration priorities as per countries' progress within the EU accession process.

In the period between 2007 and 2018, the EU notably altered its approach in relation to civil society, which is visible from the assessment of IPA I and IPA II approaches. During the IPA I period, civil society was not defined as a special sector. IPA Multi-indicative strategy papers (MIPD) only stressed the notion for better dialogue and monitoring of the effectiveness of government policies and programmes, and mainstreaming of civil society issues. Although since 2008, a steady turn towards the sectorial approach was made, it was only

⁴ COM(2018) 65 final. Communication from the Commission to the EU Parliament, the Council., the European Economic and Social Committee and the Committee of the Regions: A credible enlargement perspective for and enhanced EU engagement with the Western Balkans

⁵ Guiding documents for EU IPA for Turkey were the **Council Regulation 1085/2006**, adopted on 17 July 2006; the **Framework Agreements** signed between the Commission and the beneficiary country aiming at setting and agreeing the rules for co-operation concerning EC financial assistance to the beneficiary country and **Financing Agreements** signed between the Commission and the beneficiary country for each programme, they complete the technical, legal and administrative framework and include detailed and specific provisions for the management, monitoring, evaluation and control of each Operational Programme.

⁶ European Commission (2014 and revised in 2018); Revised Indicative Strategy Paper for Turkey (2014-2020); ADOPTED ON 10/08/2018, p.

⁷ European Commission (2014 and revised in 2018); Revised Indicative Strategy Paper for Turkey (2014-2020); ADOPTED ON 10/08/2018

in 2014 that civil society became systematically included in consultation processes in the development of strategic documents (e.g. Indicative Country Strategy Papers for each of the Enlargement candidates and potential candidates). Since IPA II, there has been an overall framework for support to civil society presented in **The Guidelines for EU Support to Civil Society in Enlargement Countries (2014-2020)** which laid a foundation for EU engagement with civil society in the Western Balkans and Turkey. It promoted civil society involvement in the identification, planning, implementation and monitoring of IPA II support across all sectors and envisaged both political and financial support for CS in the IPA beneficiaries. The Guidelines present the main vision and priorities⁸, which have been elaborated and adapted to specific contexts and changing needs. For instance, a review of EU support to Turkey confirms the evolution of EU assistance to respond to the changing landscape and operational environment for civil society, whereby consultations contributed to better alignment of EU assistance to the needs of civil society.

Throughout the period of 2007 – 2018, the EU invested efforts to continuously update civil society about its support, through consultations and information sessions. Consultations were organised to provide inputs to EU progress (now Annual) reports; through sector working groups for programming of assistance; or towards obtaining CSO inputs to the negotiation process through pre-consultations with civil society ahead of Special Group meetings. This evaluation has found that the EU strategic documents have been drafted with inputs from civil society consultations. Consultation events also evolved during the reference period of evaluation, from ad-hoc and rather erratic events to systematic events such as consultations for drafting Guidelines to civil society for various Calls (e.g. the CSF systematically organises consultations and info sessions during programming and CSF processes). Available ROM reports confirm the value of consultations with civil society in developing and implementing civil society sector support interventions, with positive ratings of the relevance criterion. However, this evaluation found certain weaknesses in the knowledge management processes of EUDs, which do not keep consistent documentary records on such consultations.

The evaluation finds that the EU was particularly successful in showing linkages between contextual analysis in a given country and the choice of objectives for CSO support. However, the evolution of the EU's support in terms of a sectoral mainstreaming of civil society was less visible.

**Judgement
Criterion 1.2**

The EU's approaches to supporting and engaging with civil society have evolved effectively in line with the needs of civil society actors over this period in the Enlargement region.

The EU's approaches in supporting and engaging with civil society have evolved effectively according to the needs of civil society actors over the evaluation period, across the Enlargement region. The EU has enlarged its focus to more systematically involve smaller grassroots organisations as well as those outside capitals, which has been valued as an increasingly appropriate action amongst all stakeholders consulted for the evaluation. The EU conveyed its engagement mainly through capacity building efforts and action grants, within which, according to the feedback from the CSOs, sub-granting (also referred to as financial support to third parties), has proved to be an extremely efficient tool. However, evaluations of grant schemes and consultations with CSOs emphasise perceived shortcomings of CfP procedures, and management of grant contracts, in terms of bureaucratic requirements and procedures which may affect the achievement of results of supported projects.

An evolution has also been noted in the demand by the EU for a more structured dialogue and cooperation between civil society and government as well as the private sector, which has become stronger over time. This has proved to be a very good approach to help connect different actors through joint projects and actions, contributing to reduced animosities and increased sustainability of actions, as confirmed by document review and stakeholder interviews.

The EU is altering its approach from project-based support towards a more flexible approach through longer-term contracts and sector budget support. This is useful given the extensive time and resources needed for preparation of proposals on the part of CSOs and managing contracts on the EUD side. However, sector budget support still does not allow for sufficient engagement of civil society beyond consultations and this is a key weakness of EU support as a whole. This evaluation has found that both EUDs and civil society stakeholders in the region lack a full understanding and grasp of what mainstreaming of civil society actually

⁸ Guidelines for EU Support to Civil Society in Enlargement Countries 2014- 2020 note that IPA support will promote the creation of a conducive environment for civil society development, as well as to strengthen the capacities of civil society organisations to engage in structured dialogue with the public institutions

means. In such cases, standard projects/programmes with/for civil society (i.e. targeted support) are viewed as the only avenue of support.

Rather than limiting itself to a certain implementation modality, the EU applies several different ones, including service contracts, framework partnership agreements, action grants, operating grants, etc. Smaller grassroots CSOs are supported through financial (sub-grants) as well as non-financial (capacity building) means. However, as reviewed project level documentation shows, one of the possible challenges to the appropriateness of implementation modalities is the time-lapse that can happen between launching the CfP to contracting and to implementation. This happens for the reason of ensuring fair and transparent selection of projects, and providing sufficient time for different steps in preparation and assessment of proposals at different stages (submission of concept notes; submission of full applications; contracting, etc.). The whole process typically ranges from between 8 months and one year.

The EU's engagement with civil society has been conducted through a combination of targeted and mainstreamed support and policy dialogue, and it has been considered appropriate as such. While targeted support offers the space for CSOs to grow their capacities by implementing actions of importance for their constituencies, mainstreamed support in theory allows the implementation of innovative projects within the framework of sector support. There are only a limited number of examples of mainstreamed support (for instance, a monitoring of Public finance management project was granted to civil society in Bosnia and Herzegovina). At the same time, a continuous effort is invested in the promotion of civil society's role in policy processes as well as in political dialogue. EU policy dialogue engages with and supports civil society directly, while also assisting governments improve their consultation mechanisms and transparency through TA for government offices in charge of cooperation with civil society.

EQ2 (Efficiency): *To what extent has the scale of resources deployed been justified considering the changes/results produced? To what extent have efficiency gains, or losses, occurred?*

The context in which civil society operates within the Enlargement region is complex with many important political, social and economic factors playing a decisive role in enhancing the position, recognition and capacities of civil society. EU engagement through financial and non-financial means has been extensive, with the EU's role increasingly becoming decisive particularly in the reference period of the evaluation which was marked by otherwise shrinking donor support and the global economic crisis. This evaluation found that the EU is the single most important donor for civil society in the region⁹. For example, a study conducted by the Balkan Civil society Network noted that the EU has invested the most of all donors across the Western Balkans region, with variations in Montenegro and Kosovo*, while other donors (in Sweden and Norway) invested comparatively more in the 2011-2012¹⁰. In Turkey, the EU is by far the most important player. European Union funding for Turkish civil society has been essential to the growth of the sector overall, and to the survival of many rights-based groups and advocacy organisations, particularly those operating on politically or socially sensitive issues.¹¹ The EU has committed €4.45 billion in pre-accession funds to Turkey over the 2014–2020 period, including €1.58 billion for democracy, governance, and rule of law. A good portion of this money is funnelled through civil society mechanisms.¹² The EU policy and programming documents, independent and external sources reports and studies that were reviewed for this evaluation, and also stakeholders interviewed, consider that resources invested over the reference period of the evaluation may be considered justified taking into account the needs and capacities of civil society sector and also the democratisation and EU accession priorities for the region.

The main efficiency losses have been noted in the time-lapse within the process between launching the CfPs and contracting/implementing projects, as discussed in JC2 above. Longer periods needed for steps from CfPs to contracting/implementing projects have potential to impact negatively on the relevance of funded interventions. On the other side, the main efficiency gains have been noted in the combination of targeted/mainstreamed and policy support, whereby EU policy/political leverage influenced faster achievement of objectives in some cases (e.g. in Serbia with the establishment of the Office for Cooperation

⁹ European Commission (2014); Guidelines for EU support to civil society in enlargement countries, 2014-2020, DG Enlargement, p. 4

* This designation is without prejudice to positions on status and is in line with UNSCR 1244(1999) and the ICJ Opinion on the Kosovo declaration of independence.

¹⁰ BCSDN (2012); Donors' Strategies and Practices in Civil Society Development in the Balkans: Civil Society: Lost in Translation?

<http://www.balkanecd.net/novo/wp-content/uploads/2012/02/81587797-BCP-8-Donor-Strategies-and-Practices-in-CSDDev-in-the-Balkans.pdf>

¹¹ Third Sector Foundation of Turkey, "Sivil Toplum İzleme Raporu 2013–2014: Yönetici Özeti."

¹² Richard Youngs and Müjge Küçükkeleş, "New Directions for European Assistance in Turkey" (Istanbul, Turkey: Istanbul Policy Center, 2017), available at <http://ipc.sabanciuniv.edu/publication/english-new-directions-for-european-assistance-in-turkey/?lang=en>.

with Civil society; inclusion of civil society in government sector working groups and other policy processes across the region, etc.)

At an interventions level, the evolution of EU support to focus more strongly on outreach to grassroots through sub-granting and diversification of funding modalities has brought stronger results in terms of enhancing the level of capacity of organisations in the centres/capitals and elsewhere. This points to justification of scale of resources deployed, though weaknesses in the approach still exist.

Pooling resources to achieve cost effectiveness in strengthening of civil society has not been at the forefront of assistance. This is due to the fact that the EU is the single largest donor to civil society across the region, with complementary funding streams by EU MS and other donors, as confirmed by stakeholder interviews. EIDHR and CSF do invest in analysing potential synergies and complementarities between the instruments as well as in selecting projects. Great care has been taken in assessing institutional capacity of partner organisations at all levels (programming, implementation, monitoring), as all EU programming documents are based on thorough analysis of the relevant factors in the referring country. However, the most salient weaknesses are noted in the way the EU analyses achievement of results through collecting and analysing indicator level data, and a lack of systematic utilisation of ROM systems, i.e. lack of independent monitoring of smaller CSO interventions. Evaluations of EU support to civil society are consistently performed while the EU also organises regional meetings to reflect on results, and this helps understand the extent to which the EU has been effective.

**Judgement
Criterion 2.1**

The scale of resources deployed for targeted support has been appropriate in the Enlargement region

Overall, document review and stakeholders interviewed within the scope of this evaluation consider that the scale of resources deployed for targeted support has been generally appropriate in the Enlargement region for the needs and scope of civil society.

Considerations of cost-efficiency

The EU has continually improved the extent to which the resources are deployed in a more cost-efficient manner, particularly since a separate facility, CSF, was established which has improved the organisation of EU assistance to civil society and increased its transparency and coherence, in comparison to pre-CSF IPA assistance which was more erratic. The EU also increasingly organises more tasks under one contract, which helps concentrate more activities under fewer contracts with larger funds. This is considered to be an important cost-efficiency gain for EUDs, which were struggling with a large number of contracts before.

The EU generally includes elaborate log frames at all levels of strategic documents relating to CSOs. A review of indicators shows that they are generally SMART, albeit with variations. However, weaknesses evidenced by this evaluation are found in the weak or non-reflection of achievement of strategic level results of instruments or CfPs by the EU. External evaluations are conducted which assess achievements to varying levels, on set indicators, but this is also not done systematically. Another weakness is a lack of systematic utilisation of the ROM system for smaller projects. The monitoring and evaluation framework, although envisaged to be established for programmes and policies, is very generic and lacks an extensive explanation on how these mechanisms will be operationalised.

The evaluation found several challenges affecting the efficiency of projects funded within the EU framework of support to civil society. These include delays in the process from launch of CfPs to assessing proposals to contracting, which occur for various reasons, such as bureaucratic procedures, contextual issues or changing project structure during implementation. Document review and interviews also pointed to limited flexibility at the level of EUD and DG NEAR relating to financial administration, and/or issues with ensuring co-funding by CSOs. This is the most significant weakness of the EU approach which creates obstacles for civil society to benefit from the EU support.

Increased outreach to grassroots organisations

Another strategy to increase the appropriateness of deployment of resources has been the evolution of the approach to engaging with grassroots organisations, particularly since IPA II, when sub-granting schemes started to become a more common type of intervention. Compared to the early stage of IPA I when outreach was difficult for many reasons, CSF and IPA II took a step forward and integrated sub-granting as a significant

component of the funding instruments. Stakeholder interviews representing EU, civil society and other consulted parties highlighted, across the board, that this is an effective tool to ensure outreach and capacity building of grassroots and small CSOs. A review of other instruments for support to Civil Society such as EIDHR and IPA Cross Border as well as the review of sampled projects indicate that there has been a good level of outreach to grassroots organisations.

When it comes to assessing the institutional capacity of partner organisations at programming, implementation and monitoring stages, this measure has become a standard practice which helps the EU and implementing partners with how to base their further capacity building activities. All EU programming documents are based on a detailed analysis of the context and the state of CS in the given country, while the TACSO project regularly includes Needs Assessment reports for each country. Projects offering capacity building and/or institutional development of different target groups (including government) across the Enlargement region are usually based on the previous assessment results as evidenced through document review and interviews.

Pooled resources

The EU operates mostly as the single donor, with only a few projects being co-financed by the government. Pooling of resources has not been utilised due to the fact that the EU is the single largest donor to civil society across the region, with complementary funding streams by EU MS and other donors, as confirmed by stakeholder interviews.

Judgement Criterion 2.2

The scale of resources deployed for mainstreamed support has been appropriate in the Enlargement region

There is very little conclusive evidence about the extent to which resources deployed for sector budget support truly mainstream civil society through budget support in the Enlargement region¹³. There is also little evidence of efforts taken to monitor the extent to which mainstreaming support assists in strengthening civil society across different sectors, if mainstreaming is understood as channelling financial resources to civil society-run activities through sector support, as compared to building conditions within sector support to bringing the views of civil society in formulation of sector strategies. The reason for this lies in the fact that mainstreaming of civil society is still rather an unclear notion across stakeholders, including EUDs themselves. For instance, only one document, IPA II CFS - Programme 2018-2019, mentions that the IPA monitoring committee will be “supported by the Sectoral Monitoring Committees which will ensure a monitoring process at sector level.”¹⁴ Regarding the assessment of institutional capacity of partner organisations at programming, implementation and monitoring stages, the analysis of the sample of mainstreamed projects does not provide any in-depth view on this aspect. Mainstreamed projects do provide analysis of the sectors of focus, but in most cases such projects do not elaborate on civil society.

Judgement Criterion 2.3

The scale of resources deployed for policy-level engagement has been appropriate in the Enlargement region

Although there is a very positive ongoing effort regarding policy level engagement activities, there is no clear overview of cost-efficiency of this type of engagement. This is due to a lack of systematic records of meetings, events or any other activities falling under this type of policy efforts. For instance, EUDs undertake extensive consultations, meetings, events with CSOs but they do not maintain records of the quantity of events, purpose, follow-up, etc. Such information would have helped the EU promote the extent of its actual support to CSOs and avoid criticism that they are not doing enough. The lack of systematic analysis of the extent of resources and efforts engaged in policy level engagement is seen as a very important shortcoming by this evaluation, due to the fact that the full deployment of resources is invisible. Better record-keeping and analysis would have been beneficial in understanding the actual extent of the EU’s support, which would raise the EU’s profile among civil society in the Enlargement region countries. Notably, there is evidence that targeted interventions and policy engagement go hand in hand, which assists the achievement of stronger and more sustainable results.

¹³ See the mainstreaming definitions in Section 5 of the main report.

¹⁴ European Commission (2018); Civil Society Facility and Media Programme 2018-2019; p. 44 ipa_ii_2018-040-646_2019-040-647_civil_society_facility_and_media_programme_2018-2019

In the same way as for the Indicator 2.3, there is a lack of evidence about the monitoring and other mechanisms deployed in order to ensure cost-effectiveness of policy-engagement activities.

EQ3 (Effectiveness): *What have been the effects of the EU's various forms of engagement with civil society in the Enlargement region?*

The EU's engagement with civil society has been part of the larger EU efforts to support the transition to democracy within the region and to prepare countries for ultimate EU integration. Support to civil society has been an integral part of these efforts, in line with EU policies but also enlargement candidates and potential candidates' aspirations. In some cases, such as in Turkey, despite the standstill in the EU integration process, the EU continues supporting civil society to represent its constituencies and defend human rights and democratic values. The EU starts from the premise that a democratic society must take the participation of civil society in decision-making processes as a political imperative, thus investing in empowerment and capacitating civil society across the Enlargement region to be(come) an active partner in policymaking processes. This has been an ongoing effort in two directions: ensuring governments understand the role of civil society and create/maintain mechanisms for cooperation; and 2) that civil society actors have the capacities, knowledge and credibility to provide adequate input. However, the level of investment within the two directions has varied (particularly in dialogue with the government) and has depended on political and other governance circumstances.

Effectiveness with regards to civil society actors' capacities, knowledge and credibility

The EU's engagement through the three forms of support (targeted, mainstreamed, and policy dialogue) has brought overall positive effects over the reference period for this evaluation across the board of countries. Particular effectiveness of support is evidenced in terms of the strengthened ability of CSOs to provide more quality inputs in policy processes, both at local and central levels. A shift has been noted in the support to networking among civil society organisations, which has brought about positive results in the engagement in policy dialogue, while at the same time offering space for peer learning and exchange¹⁵. Stakeholder interviews and the assessment of all sampled projects provides a view of results achieved in terms of enhanced capacities of organisations and their constituencies and improved practices thanks to project interventions. The evaluation found that the level of effectiveness varies when it comes to the type of civil society actor (e.g. differences exist in the level of effectiveness on civil society organisations vs. civil society actors such as social partners, or other types of actors). Civil society organisations are the primary recipients of the EU's support to civil society, while support to other types of civil society actors is minimal. Despite the fact that the EU-accepted definition of civil society is fairly wide, the EU seems to be most comfortable in supporting civil society organisations in their efforts to become professionalised and adequate partners of government in policy making and as a watchdog function. There is a limited number of projects that engage in social dialogue or that support other types of civil society actors (e.g. labour or trade unions, professional associations, etc.), particularly through traditional mechanisms such as CSF or EIDHR. This is a relevant factor when assessing effectiveness: effects on civil society organisations, particularly those based in or operating from capitals have been significant and positive in all countries. However, less effectiveness is recorded when it comes to grassroots organisations and other actors as highlighted by the review of available evaluations on EU support to civil society and stakeholders interviewed for the purpose of this evaluation. Evidence collected within the scope of this evaluation confirms the finding of the Mid-Term Evaluation of CSF, which notes that "differences [in level of capacity] exist between centrally based and those organisations outside of capitals [or other types of] grassroots organisations)"¹⁶.

Effectiveness with regards to government recognition of the role of civil society and mechanisms for cooperation

The main effectiveness driver has been the readiness of the EU to invest in political dialogue (and pressure) with the government in combination with targeted financial support to both governments (through Technical Assistance projects) and civil society (through a variety of support modalities). Over the reference period of this evaluation, there have been steps forward in ensuring an enabling environment for civil society, though variations exist between countries, depending on political and also capacity contexts of individual governments. For example, during the period 2007-2018, strong shifts in the enabling environment for civil society have been noted in each country in the Enlargement region. A major shift was noted in Turkey, a

¹⁵ Center for Promotion of Civil society and TACSO (2012); Assessment Report on advocacy capacity of membership based CSOs in Bosnia and Herzegovina; <http://civilnodrustvo.ba/media/26121/assessment-report-on-advocacy-capacity-of-membership-based-csos-in-bosnia-and-herzegovina-2012.pdf>

¹⁶ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey. 26

country that has faced significant shrinking space for civil society throughout the reference period of this evaluation culminating in 2016 following the attempted coup. A review of contextual studies, EU Progress/Annual reports and other sources point to negative trends in Serbia, Albania and the Republic of North Macedonia (though a slight increase is noted with the new government in the Republic of North Macedonia as of 2017). During the reference period of this evaluation, offices or units for cooperation with civil society have been established and mechanisms for consultation have been put in place (e.g. in Serbia, Montenegro, Bosnia and Herzegovina, Albania), with varying degree of effectiveness. The Mid-Term Evaluation of CSF found that the effectiveness of support to governments *“has been variable, mainly due to factors beyond the control of TA projects. These variables are linked to turnover of staff, political factors and the absorption capacity of government institutions to take in the tools and knowledge provided”*¹⁷

Judgement Criterion 3.1	The effects achieved through the targeted support to civil society have corresponded to the EU's initial objectives in the Enlargement region
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There is ample evidence that the implementation of targeted support to civil society has corresponded to the EU's initial objectives in the Enlargement region. The effects are visible in several areas, primarily in terms of the strengthening of CSO institutional capacities, developing CSO advocacy roles, dialogue between government and CSOs in policy making, and towards strengthening and enabling the environment for civil society; as well as encouraging CSOs to play a role in the adoption and implementation of the EU acquis in policy areas where they have an important implementation or advocacy role.

For instance, the EU's role was critical to those organisations benefiting directly from or implementing EU projects, by increasing their capacities in terms of project management and strategic planning or empowering them to engage more proactively in various community processes. The increasing focus on grassroots and organisations outside capitals is enabling a fairer distribution of capacities across countries, despite the fact that the strongest power still remains in capitals (or in Turkey in Ankara and Istanbul). The main challenges to achievement of results of advocacy that were noted in project reports, were found to be lack of political will or financial means.

The EU has been very vocal in its aim to support government efforts to enhance an enabling environment with CSOs. This included promoting the development of government units and mechanisms for cooperation with civil society, policy dialogue towards increasing transparency and access to government fund for CSOs, etc. A review of the EU progress/country reports and EU progress reports on civil society across the region show some positive shifts, and a steady cooperation between civil society and authorities at a national and local level. The only exception is Turkey, which faces ever-stronger repression of civil society and challenges in the work of civil society actors. One of the challenges affecting the quality and occurrence of government-civil society dialogue is the lack of professionalised organisations within many sectors, as also confirmed by this evaluation.

Judgement Criterion 3.2	The effects achieved through the mainstreamed support to civil society have corresponded to the EU's initial objectives in the Enlargement region
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Although the EU has recognised the need for mainstreaming civil society in the Guidelines for EU Support to Civil Society in Enlargement Countries (2014-2020), actual mainstreaming is still not systematic. Not only is there a different understanding of mainstreaming by different actors, but the inclusion of CSOs within sector support and support to CSOs' actions takes different shapes in different sectors. This evaluation found the most effective integration is within the Public Finance Management and Public Administration Reform sector, while in sectors such as education, social policy or environment, results are achieved predominantly in terms of raising public awareness on issues, monitoring policies, etc. (See Annex 3 for detailed presentation).

The main results, as evidenced by stakeholder interviews and document sources, are found in interlinkages between results achieved by targeted and mainstreamed support. Namely, results achieved through targeted support, particularly in terms of increased CSO institutional and sectoral capacities and knowledge, positively influence the results that can be achieved through mainstreamed support. As stakeholders interviewed for this evaluation emphasised, the organisations which have received ongoing targeted support through EU (and also other donors) have increased their institutional capacities, and raised their profile in their respective sectors. This has helped them become credible actors in various processes within different sectors, which is

¹⁷ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey,

an example of civil society mainstreaming. Results are also seen in terms of increased capacity of CSOs to take a more active watchdog role and to engage in monitoring of sectoral reforms. However, measurable results of mainstreamed support (through sector contracts, budgets) were not evidenced by this evaluation.

**Judgement
Criterion 3.3**

The effects achieved through policy-level engagement with civil society have corresponded to the EU's initial objectives in the Enlargement region

The policy-level engagement of the EU with the civil society in the Enlargement region continues and is a driver of a more enabling environment for civil society as emphasised by stakeholders interviewed within the scope of this evaluation. However, there is limited documentary evidence on actual number of EU activities and initiatives or their results, which is a shortcoming, as it does not allow systematic evidence of how these activities bring results beyond anecdotal level. One of the examples of the role and leverage the EU has had for the strengthening and empowerment of the civil society is the Berlin process. Within the overall framework of the Berlin process, the Civil Society Forum of the Western Balkans was organised enabling inclusion of civil society in public debates on the importance of the EU integration and the role of civil society in it.

Turkey received ongoing policy support to civil society and dialogue with the government on issues of civil society. However, the success of the policy dialogue has been reversed by the complex political situation and shrinking civil society space in the country.

EQ4 (Impact): *To what extent have the EU's various forms of engagement with civil society in the Enlargement region contributed to the enhancement of participatory and inclusive democratic governance?*

The EU membership perspective has been considered the strongest external driver of domestic political change in the countries of the Western Balkans and to some extent Turkey. Document review and stakeholder interviews provide evidence that the EU's engagement with civil society in the region contributed to the enhancement of participatory and inclusive democratic governance. This is visible through several aspects of civil society's activities such as its increased role and recognition by the government as an important partner for dialogues and consultations. Re-orientation towards a more sectorial approach is a driver for better cooperation between civil society and government, though it is not fully utilised by the EU and national counterparts to a satisfactory extent. These EU efforts and improvements have been confirmed across the region, with variation. Progress in cooperation with the government and participation in policy-making is visible across the region. The inclusion of CSOs has been mostly ensured through the establishment of a legal framework, although it has been rarely fully implemented. CSOs became noticeably more involved in the legislative process as well as in EU access negotiations, therefore it can be said that their role as an actor in political life has been recognised. For example, in the period between 2007 and 2018, Bosnia and Herzegovina marked a tangible progress (but still remained the only country in the region without continuous adoption of strategies for cooperation with civil society). Albania, Northern Republic of Macedonia and Kosovo record mostly slow but tangible progress concerning the involvement of CS in legislative process, while in 2018 Serbia still did not mark progress in systemic cooperation between government and civil society. However, the EU's efforts materialised differently at the national and local level, as only central government managed to establish and apply consultation mechanisms and systematically include civil society in the decision-making process.

In the period between 2016 and 2017, the CSO Sustainability Index remained largely stable with sustainability ranging from 3.7 for Albania and Bosnia, to 4.1 for Serbia (see Annex 3). While CSOs in all countries lack strategic planning and implementation of their own missions and have made no progress, Northern Macedonia distinguished itself as it recorded progress in strategic planning, due to donor-supported programs. The internal CSO management system which was measured within the Index in all countries of the region has been only formally implemented, while in practice there is no genuine division of responsibilities between governance and management leaders. No progress has been marked here whatsoever. The only exception is Albania, where an improvement came as a result of an incremental change since 2008 and it contributed to an improvement in overall sustainability in the country. Over almost a decade, the number of CSOs in Albania providing services to their constituencies has increased and the state has increasingly recognised the role of civil society in providing services.

The financial viability of civil society remains weak overall, but across countries, progress is still maintained. Reasons for slow progress lay in the fact that the governments across the region do not provide for full

transparency in public funding, monitoring, evaluation or sustainable financial resources for civil society organisations. In Kosovo, for example, even though the government published a first-ever report on public funding in 2017, the type of information it provided did not allow for a meaningful analysis of the budget. In the period between 2003 and 2015, Turkey saw a positive trend in the development of CSOs, managing to strengthen CSO cooperation with the government and participate in policy shaping. Nevertheless, Turkish legislative and bureaucratic obstacles and a lack of transparent mechanisms for public funding throughout the years hampered the financial aspect of sustainability. Facing the same obstacles as a whole region, Turkey did not manage to ensure financial stability. The situation deteriorated remarkably post Gezi protests, when CSOs across the country experienced increasing pressures, following the high number of detentions and arrests of civil society activists and human rights defenders.

Public perception of CSOs has been uneven across the region. While most of the countries record an increase of public trust in CSOs, Northern Macedonia deviates significantly. Due to the campaign against CSOs funded by Open Society Fund (Soros) launched at the very end of 2016 by the government then in power, the public image of CSOs deteriorated significantly. In addition, public perception of CSOs in Bosnia and Herzegovina is still often considered as rather negative.

**Judgement
Criterion 4.1**

The EU's engagement with civil society has contributed to the increased capacity of civil society organisations and actors to perform their roles as independent development actors in the Enlargement region

EU support to the Enlargement candidates and potential candidates has been distributed through three types of support - targeted support, mainstreamed support and policy level engagement. A combination of targeted and policy support contributed to positive impacts for civil society across the board of Enlargement candidates and potential candidates. Civil society is more engaged in policymaking processes, with increasing quality of inputs and insights thanks to improved organisational capacities and advocacy and watchdog roles. Stakeholder interviews and document review indicate that, across the region, governments are more aware and perceptive of the need to engage civil society in the policy making process. However, the sustainability of results achieved is hampered by political factors, such as slow EU integration and shrinking space for civil society in some countries (e.g. Turkey and to some extent in Serbia); but also challenges for civil society, primarily donor driven orientation and lack of sustainability.

The evaluation found positive trends in the ways that civil society operates and is recognised by governments. Looking back at the period between 2007 and 2018, Bosnia and Herzegovina has marked tangible progress, such as the creation of e-consultation web platforms developed in order to ensure a dialogue and cooperation with civil society. However, Bosnia remains the only country in the region which has not continuously adopted strategies for cooperation with civil society. Also, Albania, the Northern Republic of Macedonia and Kosovo have experienced mostly slow but tangible progress concerning the involvement of CS in the legislative process. In Serbia in 2018, there was still no progress in systemic cooperation between government and civil society. Due to its specific political situation, Turkey comes as an exception in the overall picture of civil society in the Enlargement region. The positive trend that Turkey marked between 2007 and 2013 was reversed in 2013 with the Gezi Protest and ensuing political complexities.

This evaluation found no evidence of long-term results of mainstreamed support. Civil society has been engaged in the programming of IPA support, and their engagement is viewed by this evaluation as cumulative result of ongoing EU support to the professionalisation and organisational development of civil society organisations. However, the available documentation and stakeholder interviews reveal that there has been no further structured engagement with civil society within mainstreamed support, which naturally yields no results.

**Judgement
Criterion 4.2**

EU's engagement with civil society has contributed to the promotion of conducive environments for CSOs and broader civil society actors in Enlargement region

Across the Enlargement region, it has been confirmed that the conducive environments for CSOs and broader civil society actors for the period of 2007 to 2018 showed progress, with improved mechanisms for consultation with civil society and improved environment for civil society activities across the countries, with the exception of Turkey. The evaluation found that the combination of EU targeted support and policy engagement has contributed to the steady progress across the region. Positive trends for the Enlargement

region have been confirmed with a review of the latest Civil Society Sustainability report as well as EU progress reports (with the exception of Republic of Northern Macedonia and Montenegro, which marked a satisfactory situation already in 2007). However, the challenges for government to ensure transparent utilisation of financial support mechanisms are affecting the sustainability of civil society and weaken conducive environment for civil society operations.

The period between 2017 and 2018 saw progress in terms of a sectoral approach orientation; this was particularly visible in the final years of IPA I and it continued in IPA II. However, although positive results were marked in terms of more intensive and systematic consultations with civil society in the programming of EU sector support, civil society engagement in deeper sectoral issues as a result of EU mainstreamed support has not been evidenced. Positive impact prospects of the policy level engagement have been driven by commitment to the EU accession by Enlargement candidates and potential candidates, albeit with variations. However, due to the slow pace of the integration process its influence as a main driver has weakened.

**Judgement
Criterion 4.3**

The EU's engagement with civil society has contributed to the promotion of structured participation of CSOs and civil society actors in domestic policies, in EU programming cycles and internationally in Enlargement region

The EU's engagement with civil society through targeted, mainstreamed and policy level support has contributed to the promotion of structured participation of CSOs and civil society actors in domestic policies, in EU programming cycles and internationally in the Enlargement region. It has been further shown that this contribution could only have been achieved through a combination of these types of support, with the caveat that mainstreamed support helped significantly in terms of structured participation of CSOs and civil society actors in domestic policies and in EU programming cycles but did not address deeper sectoral issues as yet.

Although EU support was intended for central and local level, and the EU has been working with local authorities (e.g. ReLOAD project implemented by UNDP) variations between the levels are evident in all countries across the region. Central government has managed to systematically establish and apply consultation mechanisms, while local governments are still lagging behind in terms of different practices for consultations. Document review and stakeholder interviews indicate that the EU contribution to the promotion of structured participation of CSOs and civil society actors in EU programming cycles was probably the most visible change over the reference period for this evaluation.

Another effort invested by the EU is towards strengthening the recognition of the need for inclusion of the civil society sector in policymaking and EU programming. One of the most straightforward examples was the SECO mechanism in Serbia, which was developed as a means to ensure structured consultation and input of civil society in identified sectors, but which was dismissed after some time. Although CSOs in Serbia are currently cooperating within a countrywide network National Convent, this is the area where further efforts are needed.

EQ5 (Sustainability and Ownership): *To what extent have the changes to which EU support have contributed proved to be sustainable after the end of EU funding?*

Evidence collected through document review and stakeholder interviews confirms that the changes to which EU support has contributed shows varying level of sustainability prospects. There have been some steps forward in establishing legislative and policy consultation mechanisms for civil society. However, such mechanisms are still new and have not taken strong roots to enable them to be more of essence than form. EU progress/annual reports across the countries in the region mention that there are varying levels of formalised requirements for civil society involvement in policy-making, which still happens rather on an ad hoc basis and often only in a specific phase of policy design. Legislative solutions exist but there are bureaucratic obstacles which also hamper financial sustainability, as there are challenges to utilising mechanisms for public funding transparently and no appropriate fiscal incentives. Capabilities, visibility and general development of civil society were enhanced through EU support, but Turkey, for example, saw serious backsliding in 2018 regarding the development of civil society.¹⁸ Civil society in Turkey experienced increasing pressure, following the high number of detentions and arrests of civil society activists, human rights defenders or investigative journalists. In other countries there are also varying levels of 'tolerance' of civil society, with pressure visible in some cases, such as most recently in Serbia. The fact that governments in many cases do not have or

¹⁸ Turkey EU Country Report, 2018

have an expired comprehensive government strategy to ensure cooperation with civil society creates further difficulties in ensuring that CSOs are meaningfully supported and included in consultations as part of law and policy-making processes and monitoring.

One of the aspects depicting the overall sustainability of the changes achieved through EU support is the aspect of CSOs capacities across the Enlargement candidates and potential candidates. Comparative overview of the Sustainability Index indicates that while all Enlargement candidates and potential candidates mark slow but steady progress in this regard, there are still many obstacles. Civil society organisations are still largely donor driven and have project orientation applied due to the fact that funds are limited and sector priorities in which funding is available keep changing.

Solid foundations are laid by the EU towards involvement of civil society in the policy sphere, with a positive sustainability outlook. This is particularly true when it comes to programming of EU support and also planning of sector strategies of government, albeit with variations. One weakness that has been evidenced by this evaluation is that programming and project level document do not include a section with elaboration of EU phasing-out measures for that particular intervention.

**Judgement
Criterion 5.1**

The results achieved through the EU's support and engagement with civil society allow the beneficiary organisations and actors to continue to operate as effective actors in the civic and governance realms

An indicator of the general sustainability of the results achieved through EU support and engagement with civil society is the sustainability of the capacities developed within civil society. A comparative overview of the CSO Sustainability Index shows that all countries in the Enlargement region (Turkey excluded) mark slow but steady progress in this respect. At the same time, CSOs encounter numerous challenges to sustainability due to the lack of a stable funding base, which results in the donor driven nature of CSOs and project orientation, departing from their constituencies or changing thematic fields or working areas. This evaluation found evidence of improved managerial skills and organisational capacities through different EU interventions assisting organisational development (e.g. TACSO). However, the lack of systematic and transparent government funding for CSOs and lack of diversified funding base for organisations (e.g. from private sources; philanthropy, etc.) creates ongoing sustainability challenges for civil society. This in turn negatively affects the extent to which CSOs maintain their operations as effective actors in the civic and governance realms upon expiry of EU funds. Interviews with stakeholders reveal that, in many cases, civil society organisations do not manage to maintain their advocacy or direct interventions due to the lack of a funding base.

The EU has been the main driver for the creation of an enabling environment for civil society, as confirmed through document review and stakeholder interviews. The EU has influenced governments to create a more conducive environment for civil society through the establishment of mechanisms and legislative/policy solutions. However, these mechanisms are still fragile. For instance, countries such as Serbia and Turkey encounter shrinking civil society space and closing up of the government to civil society. Some interventions, such as the project on strengthening dialogue in Bosnia and Herzegovina, have limited sustainability prospects due to contextual challenges in the country.

Similar results are marked regarding the involvement of civil society in the policy sphere. EU involvement has been continuously high, resulting in a strong foundation for civil society to engage and become effective actors in civic and governance realms. Across the region (except Turkey), civil society engages more dynamically in the policy making processes and is increasingly seen as a partner of government. As with the enabling environment, these foundations are still fragile and dependent on many factors, including government commitment to participatory decision-making and civil society sectoral expertise and capacity. Besides, this evaluation confirms the 2012 Evaluation of EU support to civil society finding that *"sustainability prospects also depend to a large extent on the overall democratisation processes in the countries in the region, and the full adoption and implementation of good governance standards."*¹⁹

¹⁹ European Commission (2012); Thematic Evaluation of EU's Support to Civil Society in the Western Balkans (namely, Albania, Bosnia and Herzegovina, Croatia, the Republic of North Macedonia, Kosovo under UNSCR 1244, Montenegro and Serbia) and Turkey 2012 (link: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/financial_assistance/phare/evaluation/2012_eval_cs_final_report_2.pdf), p. 29

The manner in which EU support to civil society organisations is conceptualised is not in itself favourable to ensuring that projects that provide good results are extended. The EU enables an open space and the opportunity for a variety of players to participate in calls for funding, on an equal basis, and this is ensured through CfPs within civil society instruments (e.g. CSF, EIDHR, or even CBC), whereby the projects are selected within each round based on a transparent set of criteria and selection process. On the other side, the design and implementation of EU interventions and activities in most cases integrates sustainability, albeit to varying degrees depending on the topic, contextual challenges and also due to the duration of projects. Phasing out measures are integrated through a variety of actions including capacity building and improved cooperation between public authorities and CSOs. Also, CSF projects have an increasingly longer duration, up to four years which presents a way to support CSOs in the medium run. Stakeholder interviews reflect that many projects suffered from a short duration and an overambitious plan, which in their opinion is often driven by the need to win the project. Also, there is no evidence of the EU's deliberate approach to developing and deploying phasing-out measures for specific supported interventions. These challenges negatively affect the sustainability of results achieved with EU support.

Regarding the liaison over sustainability with key civil society stakeholders in the civil society, governmental and international donor sphere, there is evidence that the EU has liaised with other donors to continue projects started by other donors or extended support to make sure such interventions have higher sustainability prospects. However, there is no other type of liaison that would create stronger leverage for sustainability.

EQ6 (Coordination, complementarity and coherence): *To what extent have the various forms of EU engagement (including policy dialogue and financial support) with civil society in the Enlargement region been effectively coordinated, complementary, and coherent with the activities of EU MS and other donors?*

Document review and stakeholder interviews show consistent evidence that various forms of EU engagement (including policy dialogue and financial support) with civil society in the Enlargement region have been effectively coordinated with the activities of EU Member States and other donors. The EU invests efforts to hold coordination meetings with EU Member States and other active donors. There are examples of joint policy stances in issues of matter to civil society (e.g. in Turkey) and also of coordinated efforts in responding to the needs of civil society more widely (e.g. supporting organisational development, watchdog and advocacy roles, etc.). There is complementarity in the application of EU instruments in support of civil society, as well as in the allocation of funds between the instruments (EIDHR, CFS, IPA CSB). In relation to allocation of funds, there is evidence of an appropriate "division of labour" between these instruments, whereby for example EIDHR is investing more in its human rights, CSF targets broader democracy development and CSO capacities including in relation to the EU integration agenda, as well as media, while CBC promotes initiatives of grassroots organisations, cooperation of government and civil society and social cohesion.

At a strategic level, the EU, EU Member States and other donor strategies for civil society are coherent and provide for a common vision of the role and positioning of civil society in the public realm. However, at the level of actual support, some overlaps have been noted between calls for proposals and supported projects funded by EUDs, DG NEAR and other donors.

As discussed across the evaluation questions, there are direct links between policy work and financial support, which have directly influenced a number of outcomes, particularly in terms of stronger engagement of civil society in policy processes and strengthening the enabling environment for CSOs. The EU also invests in multi-stakeholder dialogues (e.g. fora), leveraging its positioning towards the better engagement of civil society. Such examples are the Special Groups, regional events (e.g. the Berlin process) but also other multi-stakeholder dialogue fora including EU DGs, EEAS, EUDs, EU MS, etc. The evaluation found that there is an overall good coordination between EU DGs, EEAS and EUDs and a rather coherent approach and orientation when it comes to support to civil society. There is complementarity in the application of instruments, as well as in the allocation of funds between the instruments, i.e., EIDHR, CFS, IPA CBC. In relation to the allocation of funds, there is a trend towards the "division of labour" so, for example EIDHR is investing more in human

rights, CFS is concerned more with the support for democracy and media, while CBC promotes the initiatives of grassroots organisations, cooperation of government and civil society and social cohesion. However, at the level of actual support, incoherence has been noted between CfPs by EUDs, DG NEAR and other donors.

Judgement Criterion 6.2	The combined efforts of the EU and EU Member States and other donors have led to a coherent and complementary response to the needs of civil society.
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Document review and stakeholder interviews confirm that combined efforts of the EU and EU Member States and other donors have led to a coherent and complementary response to the needs of civil society across all the countries in the region. The EU is the single most important donor, with EU MS and other donors contributing to the development of civil society in a mostly coherent manner and with a joint message. This is the result of the efforts invested by EU senior officials in coordinating with EU Member States and other active donors, which was commended by all interviewed stakeholders. Weaknesses exist, however, and particularly in terms of coordination at the level of specific areas of interventions within the more general civil society support framework. The evaluation found that the coordination at a regional level in particular is not so visible and systematic, which leads to some overlaps.

Judgement Criterion 6.3	Synergies were achieved and duplication of efforts of the EU, EU MS and other donors was avoided in the Enlargement region.
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The evaluation found synergies between the EU, Member States and other donors at the level of strategic orientation towards civil society and their support to the sector. There are, in general, no deviating visions on the issues of civil society. However, there is evidence that, at project level, there are some shortcomings when it comes to synergies and overlaps among donors but also among projects funded by the EU. For example, although there is evidence of an exchange of information between the IPA regional project "Capacity Building of Civil Society Organisations in Western Balkans and Turkey" and the USAID funded project "Stable development of NGO sector", project reports described shortcomings in terms of formalised coordination as well as for the synergies in order to avoid overlaps.

EQ7 (EU-added value): *To what extent have the various forms of the EU's engagement with civil society in the Enlargement region over the evaluation period had characteristics that distinguished it from that of other actors?*

The EU is the single most important actor and donor in the Enlargement region. The region faced significant shrinking of donor support within the reference period of the evaluation, creating space for the EU to combine and leverage its financial support with strong EU accession policy dialogue. As noted in the section on impact, the EU membership perspective has been considered the strongest external driver of domestic political change in the countries of the Western Balkans and, to a lesser extent, Turkey, as confirmed by document review and stakeholder interviews. This distinguishes the EU from all other actors, particularly from the point of view of positive general support to EU integration across the region.

Judgement Criterion 7.1	EU support to civil society in the Enlargement region has had a distinctive feature in comparison with that provided by other actors, based on its comprehensive and multi-faceted approach
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EU support to civil society in the Enlargement region has been the single most important investment in the sector, particularly since the late 2000s. For a variety of reasons, including gradual development and consolidation of the socio-economic environment, the global financial crisis and EU accession priorities, the donor space has been rapidly shrinking. Also, across the period of this evaluation, no other donor has invested in civil society in such a comprehensive manner with such a multi-faceted approach as the EU. Other donors mostly engage with civil society organisations on an individual basis or through CfPs, but without necessarily investing in systematic dialogue with governments and/or building capacities of government to strengthen their consultation mechanisms, as the EU has. Also, no other donor insists or envisages support to civil society through their sectoral interventions.

EQ 8 (EU-added value): *To what extent could changes, which the EU contributed to, have happened in its absence?*

The Enlargement region has faced significant transition and, in some countries, post-war reconstruction that entailed tectonic changes in the ways in which societies operate. The available evaluations and policy documents reviewed for this evaluation indicate that the EU's support and the EU membership perspective has been considered the strongest external driver of domestic political change in these countries. Although the changes would most probably have happened within these societies, they would have taken significantly more time without the support of the EU, and the associated outcomes and challenges cannot be assessed.

Judgement Criterion 8.1	EU support has been an essential factor in contributing to significant change in the sphere of civil society development in the Enlargement region.
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Due to its specific role and leverage, the EU has been able to provide support that has been different from support provided by other donors. It has managed to combine various modalities of support, and particular added value is seen in the combination of targeted support and policy dialogue. In addition, the leveraging of the EU accession perspective with funds directed to civil society capacity and empowerment has been another additional value in comparison to other donors.

2. Neighbourhood South

EQ1 (Relevance): *To what extent have the EU's objectives and approaches to its engagement (policy and financial support) with Civil Society properly addressed the variety of problems faced by / needs of civil society actors in the Neighbourhood South region over the evaluation period?*

Judgement Criterion 1.1	The EU's objectives with regard to its support to civil society have evolved effectively in line with the needs of civil society actors over this period in the Neighbourhood South.
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In 2012, the EU achieved a key policy shift, resulting from the convergence of two parallel processes: one at the global level with the structured dialogue initiated in 2010 and culminating in the 2012 COM, and the other at the regional level, with the Arab Spring and two revisions of ENP policy (2011 and 2012) to address it. In 2012, a consolidated EU democratisation policy through support to civil society, was defined, both at global and regional level, which responded to the need of civil society to engage and contribute to the democratic transition process.

This evaluation found there to be a strong consensus amongst stakeholders on the relevance of the EU's engagement objectives with CS in light of the political context and the democratic transitioning of the ENP South countries over the period. Many criticisms were made by CSOs about the EU's engagement with the CS before 2011. However, CSOs also recognise the changes made since 2011/2012 and particularly the first capacity building EU objective, which is considered most relevant to their needs.

In the face of the internationalised civil wars in Syria and Libya, resulting in increased migratory flows to Europe, the election of Islamist governments in several countries, the authoritarian counter-revolution in Egypt and the general tendency to tighten civic spaces in most of the countries, in 2015 the EU revised its ENP policy in a more stability and security oriented direction, appearing less aligned with the objectives of the 2012 COM.

Operating democratisation objectives through support to CSOs in authoritarian contexts, without resorting to restrictive political or financial measures to governments violating human rights or limiting civic spaces, was underlined as the main element of low relevance.

Consultation with civil society is mandatory and is included in both policy documents and internal review mechanisms. Since 2012, there has been a systematic consultation of CSOs before or during the drafting of key policy, programming or even technical documents. During the identification and formulation phase, CSOs are consulted to identify priorities that will be indicated in the guidelines of the Calls for Proposals.

Although efforts are recognised to have been made to mainstream the participatory approach in identifying needs and consulting for programming, especially since 2011, the lack of diversity of actors, the formality of the meetings (tick the box) and the absence of exchanges and follow-up after the consultations have resulted

in persisting criticism expressed by respondents. EUDs recognise that consultations are carried out with limited means, gathering small number of capital-based organisations.

At the political level, there are regular consultations with CSOs through several mechanisms that constitute the HR diplomacy of the EU. CSOs are key informants feeding the EU's knowledge on the HR situation in the country.

At the regional level, consultations with CSOs were further instituted from 2014 and the launch of the CS Facility South regional program, including technical assistance for the establishment of a CS Forum South. Four annual sessions (along with regional preparatory sessions) were held between 2014 and 2017. As the dialogue was rather structured by the EU, or at least to respond to the EU's needs, through technical assistance, CSOs represented were mostly EU financial partners of the countries. A new setting for the CS Forum South was decided with the launch in 2018 of a granted programme, called the "hub" and then "Majalat", led by a consortium of regional organisations. When asked, the CSOs responding are satisfied with the EU efforts to initiate such a policy dialogue with the CSOs at a regional level. However, many organisations interviewed that once participated in the CSF are not convinced by the value for their organisation and their actions.

**Judgement
Criterion 1.2**

The EU's approaches to supporting and engaging with civil society have evolved effectively in line with the needs of civil society actors over this period in the Neighbourhood South

Before 2011, in the context of authoritarian regimes as a dominant model in the south shore of the Mediterranean, the thematic and global instruments NSA-LA and EIDHR were key for the EU to engage with civil society through targeted support. The introduction in 2007 of the Non-State Actors and Local Authorities instrument in the region was seen "as a significant shift in the EU's democracy promotion strategy in the European neighbourhood"²⁰. They have proved over the period to be instrumental in supporting CSOs, as they do not depend on bilateral relationships. Each instrument has its own specificity: the focus is more on inclusive development and consultation process between state and non-state actors at the local level for NSA / CSO-LA, whereas it is rather placed on the protection of rights and the support of human rights defenders for the EIDHR. EIDHR is theme-oriented while NSA/CSO-LA is more actor-oriented.

Over the period of the evaluation, action grants through Calls for Proposals has been the main modality of financial support to CSOs, aimed at ensuring transparency and equal treatment, with due respect to financial regulation. On the other side, the evaluation found a clear consensus that the conditions of access to these grants can only favour organisations with a high initial level of management capacity (result-oriented project and administrative and financial management and communication). The procedure is so complex, and the level of requirements are so high that only a minority of CSOs can meet them. Among them are the INGOs, which are often criticised by national CSOs for being in a position of unfair competition with them. In some countries, intermediate national CSOs were formed already before 2007, especially in Palestine²¹, in Lebanon, and to a lesser extent in Morocco, channelling EU funding to local organisations. The procedures for obtaining EU grants are appropriate for these national and international intermediary organisations, qualified by the EU as the "usual suspects". They are nevertheless indispensable for channelling funds towards the targets, given the complexity of EU rules and procedures. These organisations are those able to implement sub-granting mechanisms, incorporated in the action grants contract. This is the only way for the EU to extend financial support to more organisations.

The other modalities of implementation available to EUDs are modalities that support organisations more than projects, involving the construction of a more strategic partnership with the EU. The financial support is co-defined between the two partners as part of a direct award, without a Call for Proposals. Although little used, this type of modality, mainly operating grants, has been tested more recently in Morocco and Palestine, with associative platforms engaged in political dialogue. These modalities have been highly relevant and appropriate for addressing EU objectives set after 2012, especially regarding policy dialogue and participation. The Partnership Framework Agreement is a more recent modality and has yet to be tested in the region.

The EU's engagement with CS during the period 2007-2012 is understood in the framework of capacity development including a combination of action grants and non-financial activities as the envelope allocated

²⁰ Blockmans, Kostanyan, Remizov, Slapakova, Van der Loo, 2017. "Assessing European Neighbourhood Policy Perspectives from the literature". Study commissioned by the Policy and Operations Evaluation Department of the Ministry of Foreign Affairs of the Netherlands, CEPS, Brussels/Rowman and Littlefield International, London

²¹ This designation shall not be construed as recognition of a State of Palestine and is without prejudice to the individual positions of the Member States on this issue.

per thematic instrument (especially NSA/CSO-LA) and includes the possibility of carrying out capacity development activities such as training courses, information sessions, workshops or seminars. These are one-off activities, described as support measures in the CSO-LA and EIDHR Instruments, complementing the action grants. The use of these activities varies from one country to another. The capacity development objective is geared towards the institutional capacities of CSOs, understood as the ability of CSOs to apply for EU grants and absorb them. As for regional programmes, they have also shown their relevance and have proved appropriate to address sensitive issues that could not have been addressed bilaterally, to integrate CS into sectorial cooperation and to facilitate dialogue between CSOs and national authorities. Severe limitations in reaching out to CSOs have been identified, mainly due to regimes' controls on the institutional set up of the programme.

Since 2011, and facing the turmoil of the Arab world, The EU has diversified and implemented a wide range of engagement and support channels, developing new engagement activities fully dedicated to civil society through an integrated approach, aligning with the 3 objectives of the 2012 COM.

For this, the EU has been able to rely on the incentive-based funding mechanism, strengthened by the ENP revision in 2011 and 2012, and operating the "more for more" principle, which consists of rewarding progress made by a partner country in the area of democratic reform, by increasing the EU financial engagement. The EUDs contribute to the targeting and the diversification through the use of several vectors at their disposal, notably by using more systematic mapping at the beginning of their programming exercise.

As for the diversification, the analysis of the samples formed for this evaluation shows that the EU succeeds in translating principles into actions as it delivers support to a wide range of organisations, in line with its broad understanding of the concept of civil society.

New CS comprehensive support programmes have in common to offer a wide range of activities and services to civil society from a capacity development perspective, in order to achieve the EU's objectives, and with a focus on non-financial activities, such as training, networking, and facilitation of consultation between CSOs and public authorities. Some programmes have incorporated a sub-granting financial mechanism and others have established local offices to decentralise the action and be closer to the interactions between civil society and state actors.

Given Israel's annexation of East Jerusalem since 1967, the EU has launched a self-standing programme for East Jerusalem, specifically targeting CS. The main modality is the grant action but by direct award and not by CfP.

In the context of the EU-civil society policy dialogue, the representation/representativeness of CSOs is a permanent issue. The dialogue has been structured around several successive mechanisms.

- The technical assistance model of the CSFS, from 2014 to 2017, mobilised CSOs from the databases of EUDs, thus mechanically targeting funding recipients.
- Since 2018, with the Majalat programme, the historical CS regional networks have taken centre stage and have mobilised their affiliates, including, in some countries, a new generation of activist and advocacy organisations.

EQ2 (Efficiency): *To what extent has the scale of resources deployed been justified considering the changes/results produced? To what extent have efficiency gains, or losses, occurred*

Judgement
Criterion 2.1

The EU's objectives with regard to its support to civil society have evolved effectively in line with the needs of civil society actors over this period in the Neighbourhood South.

1. Increased outreach to grassroots organisations

While the budget envelopes dedicated to targeted support are generally increasing, the number of initiatives supported decreases. This shows a process of concentration: budgets allocated by contract increases, and grants are allocated to a limited number of intermediary organisations able to comply with EU requirements. Concerns have been constantly raised that the majority of funding for CSOs goes to larger organisations rather than to 'grassroots' organisations. The idea that "INGOs remain privileged" and that access to support remains limited for small NGOs, particularly because of the complexity of the procedures, is very significant and recurrent in the responses obtained during this evaluation. This is confirmed by grants allocation analysis that shows on a trend over the period to higher contracting with INGO as main applicants.

According to the EUDs, the most effective way to consider cost-efficiency, by reaching a larger number of actors, while limiting the increase in the workload at the level of the EUDs (as an alternative of Action Grant under direct management) is through sub-granting. Experience of sub-granting has been growing in the region and over the period, especially in countries where the capacity level of CS is high (Palestine, Lebanon, Morocco, Israel). The sub-granting mechanism is sought after by the EUDs for the positive cost/benefit ratio that it brings about but it also reinforces the role of intermediation of the interlocutors of the EUDs, able to carry sub-granting mechanism and more widely to channel EU funds.

In terms of outreach to grassroots organisations, the innovation of launching comprehensive support programmes to civil society has not only increased the resources allocated to the CS but improved the grassroots organisations' access to non-financial support, and sometimes to financial support. Regional programmes, due to improved design and outreach opportunities offered by the Arab Spring, have, for example, helped to better reach youth movements in some countries.

2. Pooled resources

The experience with pooled resources is mixed. The Trust Fund complements country actions that can be fragmented, but the support to the CS is nevertheless marginal. In terms of resource pooling, joint programming between the EU and the MSs is a formidable resource pooling mechanism in the service of collective strategy. It is particularly in place in Palestine and helps mainstream and coordinate support initiatives to CS. Regional programmes can be seen as attempts of resources pooling and of amplification of the scope of intervention and support. Activities in countries through regional projects or programs are superimposed on other initiatives, providing additional support for thematic and bilateral instruments and complementing each other when they are well coordinated. In some cases, regional programs can be a real pooled resource, such as for Palestine and Israel, with the Peace Programme, which primarily targets Israeli and Palestinian CSOs and their cooperation in a multi-sectoral approach.

3. Considerations of cost-efficiency

When questioned, the EUD staff indicate that the choices in the use of the instruments depend more on the relevance of the instruments compared to the needs of the interventions than considerations in terms of cost-efficiency. This is a criterion looked at all stages of programming and through the quality review process but it does not predominate when choosing one instrument or another. Relevance of the instrument, meaning its specificity, and sometimes the availability of funds are the key parameter for the EUDs. Nevertheless, the consideration of cost-efficiency is becoming more important: combining calls for proposals under the EIDHR and CSO-LA into one call and using the two-year planning process is one of the measures taken in that regard. Resorting to indirect management, delegation agreements, contract services and, to a lesser extent, TA, in order to increase allocated budgets and delegate management tasks to third parties is another trend for better considering cost-efficiency. Finally, the design of CS support programme lead also to a better consideration for cost-efficiency as this has been the case in Morocco. The focal points in the delegations, with the support of the members of the CoTE, were able to experiment different approaches in the region by asking about the best use or the best mix of grant, technical assistance, and direct agreement / contract service, in line with the cost-efficiency criterion and the management and monitoring capacities of the EU.

While the CfP procedure is considered particularly burdensome for the EUDs staff, most of the CSOs encountered in the context of this evaluation (especially in Morocco, Israel, Palestine and at the CS Forum South) consider that the conditions and procedure for obtaining and managing the funds lead to inefficiencies for their organisation. Obtaining EU grants induces significant transaction costs, placing organisations in a situation of insecurity.

4. Institutional capacity of partner organisations

In line with the objectives of COM 2012, the desk review shows that the EUDs have developed a knowledge production system by more systematically using mapping exercises and identification missions, which contribute to better assessment of the institutional capacity of CSOs. The process of elaboration of the Civil Society Roadmap is also a valuable exercise generating a retrospective and prospective analysis and mapping EU and Member States interventions.

Judgement Criterion 2.2

The scale of resources deployed for mainstreamed support has been appropriate in the Neighbourhood South

This could not be evidenced.

EQ3 (Effectiveness): *What have been the effects of the EU's various forms of engagement with civil society in the Neighbourhood South*

Judgement Criterion 3.1	The effects achieved through the targeted support to civil society have corresponded to the EU's initial objectives in the Neighbourhood South.
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In this evaluation, we identified four types of targeted support: (i) programmes integrating capacity building and policy dialogue; (ii) projects linking service and local governance; (iii) projects linking service and national advocacy; and (iv) strengthening projects capacity in countries in crisis. The documentation of the projects studied shows that they have been implemented in general, without encountering major problems, with the exception of a few projects in Egypt and Libya.

Consultations with CSOs for this evaluation, whether via the online survey or the interviews, show a high level of satisfaction with the EU's engagement to capacity building, highlighting in particular the positive evolution that has taken place since 2012.

Organisations implementing projects that combine service delivery and advocacy in the field of human rights or adopting a rights-based approach, are the ones that most develop their capacity to act as independent actors of development and governance in its own right. They are also the ones who are most involved in policy dialogue. These organisations have generally engaged in a long-term development process, often through partnership with an INGO or through successive EU support. The positive effects are all the more important in countries where there is a relatively stable and favourable environment for CSOs, as for Morocco, Palestine, Lebanon and Tunisia (since 2012).

As after 2012, civil society support programs provided a wide range of capacity development activities, some of which involved financial support through sub-granting. Nevertheless, these programs are more activity-oriented than change-oriented and do not view capacity development as a cumulative process. No new formalised collective dynamics emerged as a result of an EU programme. In terms of capacity-building activities, the existing documentation mentions that the effects have been produced at the individual level, that is, at the level of the participants in the activities, without it being possible to show how the training and other types of activities help strengthen organisations. Several sources agree that training is the most common capacity-building activity but does not produce the desired effects. More recently, institutional coaching activities developed in the integrated CS support programs are recognised to have greater effect on organisations. These are qualitative, tailor-made actions that affect a smaller number of organisations.

More generally, the adoption of the programme approach (unlike the action grant) is a major innovation under test since 2012 in five countries in the region. The design of the most recent programs (such as that of Morocco) shows that lessons have been learned, which promises positive effects.

Finally, regional programmes have made great improvements, especially by being more innovative to target specific groups of people and individuals such as youth, though concrete results remain limited.

Judgement Criterion 3.2	The effects achieved through the mainstreamed support to civil society have corresponded to the EU's initial objectives in the Neighbourhood South
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Before 2012, the issue of mainstreamed support to CSOs had not yet reached the level of institutionalisation provided by the 2012 COM. Nevertheless, there were a number of sectors in which programmes were implemented with a civil society component, mainly through regional programmes which proved to be highly relevant and effective in stimulating dialogue and cooperation between regional partners. In the most sensitive areas (e.g. governance, migration, civil society), the regional approach was completely necessary, as there was little space for bilateral cooperation. After 2012, there has been a systematic reference to CS in the EU country Action Plans and the priority sectors. All the cases of mainstreamed support to CSOs that we have identified, either being in the framework of regional programmes before 2009 or in national sector programmes after 2012, are divided into two modalities.

- Inclusion of a funding mechanism (mainly Action Grants through CfP) in specific sectors, in relation to its service provider role. No evidence could be found in the documentation on how this mechanism interrelates to the EU budget support to the government, which makes mainstreamed support initially relevant.

- Participation of the CS in the elaboration phase of the policy-making, though consultations and National Meetings, without there being any evidence on the influence exercised by the CS through this participation.

On the contrary, budget support and CS support seem disconnected from each other. Likewise, the consultation with the CS is more top-down and punctual without there being a CS representation mechanism allowing it to have access to information on elements of negotiation with the EU and follow up on the implementation.

The organisation of the cooperation section of EUDs according to sectoral priorities allows for mainstreaming of civil society insofar as each person in charge of a sector leads the support to the State and to civil society, in conjunction with the human rights and civil society focal points. This is the case, for example, in Morocco and Tunisia. In Palestine, the organisation is different in that the EU adopts a multi-sectoral approach in relation to territories with specific status (East Jerusalem, Area C, Gaza), in addition to the more traditional sectoral approach. Mainstreaming civil society into sector support is carried out, for example in the water and agriculture sectors, or in the Area C programme, because there is a high level of capacity of some organisations to ensure a technical provider role.

Judgement Criterion 3.3

The effects achieved through policy-level engagement with civil society have corresponded to the EU's initial objectives in the Neighbourhood South

Despite a particularly unfavourable context for civil society in most countries in 2009 (almost complete closure in Syria and Libya, very limited space in Algeria and Jordan, very controlled in Tunisia and Egypt), the ENP progress reports highlight areas where governmental authorities consulted the CS in the process of public policy making. This is particularly the case in the field of social protection, with the MoSS as the main interlocutor, but also independent public organisations or charities, presided over by the first ladies or a member of the ruling family (Jordan, Egypt, Morocco). Consequently, the strategy for the protection of women in Palestine and Morocco or the child protection strategy in Egypt and Lebanon (child trafficking), has been traditionally subject to consultation with civil society. Policy dialogue between civil societies and governments seems possible even in restrictive contexts, on non-sectoral policies centred on a specific category of population (Women and Children), which is overseen by a government body that selects the organisations with which it wishes to interact. The dialogue is all the more feasible as the issues on the agenda are not considered sensitive

After 2011, the level of participation of civil society in policy dialogue has been skyrocketing in Morocco, Tunisia and Palestine, and now touches more complex areas, in addition to the traditional areas in which the CS was traditionally confined: corruption, justice, migration, local governance, security.

In countries where policy dialogue between the CS and the authorities is limited due to a lack of civic space, the EU strives to promote an enabling environment for CSOs through political and diplomatic dialogue with the authorities, and adjust its support to priorities, negotiated and agreed upon by the EU and the country partner. This situation places the EU in the face of the following contradiction: on the one hand, to cooperate with states that restrict the action of civil society, practising, for some of them, a more general crackdown on civil liberties and, on the other hand, to engage with civil society through democratisation goals.

At the regional level, CSOs survey responses appreciate the resumption of regional dialogue and underline its importance. The observation at the CS Forum South in Brussels in 2016 and 2018, along with key stakeholders' interviews, however, suggest that the EU's attempts to engage in a structured dialogue with the CS of the ENP South have had little effects.

- First, there is little continuity between each edition as different organisations participate in each. Although it makes it possible to reach a larger number of organisations that are given the opportunity to participate, it makes it more difficult to follow up recommendations and deepen them.
- Second, the effects of regional dialogue are limited because of a low level of understanding of the objectives of the Forum by the CSOs, a mismatch in expectations between the EU and CSOs, and a difficult articulation between the national and regional levels. The other challenge lies in the lack of civil society capacities, resulting from a low knowledge of EU structures and initiatives and a low capacity to produce strategic inputs at the regional level, given the specificities of each countries.

A real qualitative leap was made between 2016 and 2017 with the constitution of thematic groups. The nature of the claims is much more qualitative in 2017 and is receiving more attention from the Commission. This is

illustrated by taking into account the recommendations on the promotion and protection of LGBT rights, through the launch by the EU of a regional (confidential) programme under the EIDHR, which (at the time of writing this report) was expected to be contracted in 2019.

The last phase of the structured dialogue between the EU and the CSOs in the ENP South starts in 2018 with the “regional hub”, a grant-funded programme led by a consortium of North and South NGOs and networks, and renamed as Majalat. This grant framework corresponds to the demand of the main regional CSO networks (Euromed Rights, ANND, Solidar) to lead the conduct of the dialogue process. This 3-year programme is seen as an opportunity to go beyond a stand-alone event, introducing more continuity and ownership.

EQ4 (Impact): *To what extent have the EU's various forms of engagement with civil society in the Neighbourhood South contributed to the enhancement of participatory and inclusive democratic governance?*

The impact of EU forms of support for civil society in terms of enhanced participatory and inclusive democratic governance varies from country to country and depends on the institutional environment. As the institutional environment results from the level of State respect for public and individual freedoms, it determines the conditions under which CSOs can operate and EU support can deploy in line with its objectives of democratisation.

1. Political and institutional evolutions of ENP South countries from 2008 to 2018.

In the ENP South region, we can distinguish:

- The countries with a long tradition of authoritarianism and a sophisticated system of repression (**Algeria, Libya, Egypt, Syria, Tunisia**)
- Authoritarian regimes which operated in early 2000s political openings in the framework of controlled democratisation process (**Morocco, Jordan**),
- Countries that have an older tradition of pluralism: **Israel and Lebanon**.
 - Israel's policy of occupation, colonisation and annexation are contrary to the principles of the rule of law.
 - The specific nature of the Lebanese political regime, based on confessionalism, certainly guarantees respect for public freedoms but generates numerous obstacles to the functioning of the State according to the principles of good governance. During 2015, Lebanon experienced social movements directly linked to the issue of governance and corruption, particularly on the issue of waste management (#youstink movement). A new social and political movement emerged in 2019 on the issue of corruption and political sectarianism.
- **Palestine** is obviously a case apart from the fact of a more recent state building process but founded since the 2000s on democratic principles and inclusive governance despite the situation of occupation. However, the conflicts between Fattah and Hamas have resulted in an institutional and political deadlock with the postponement of the holding of national elections since 2014.

The period covered by the evaluation was marked by political events which shook many countries in the region in 2011/2012. The Arab Spring was a political and institutional break in the period studied. Among the authoritarian countries concerned by social movements:

- Syria and Libya plunged into the internationalised civil war,
- Egypt is engaged in an authoritarian counter-revolution,
- Algeria experienced a kind of status quo during this period 2011-2018, despite the regular explosion of revolt movements in the territory. In 2019, Algeria entered a revolutionary process marked by the withdrawal of the outgoing president from the presidential elections.
- Tunisia has experienced a real process of democratic transition,
- Morocco and Jordan have gone through an institutional reform process.

2. Impact of EU support to CSOs

The impact of EU support for CS toward a democratic governance is greater in pluralist and transitioning countries than in authoritarian and conflict-affected countries. With authoritarian regimes, the effects of EU actions promoting an institutional environment more favorable to national CSOs and also INGOs has been very weak. Democratic and inclusive governance is not an object of cooperation between the EU and authoritarian regimes, and this increases the challenge for the EU in maintaining its support for civil society.

If a process of professionalisation of civil society is underway in all the countries of the region due to EU support, it is more significant in pluralist countries like Israel, Palestine and Lebanon where the CSOs are able to carry out advocacy campaigns while operating in coalitions supported by the EU. Significant progress has been recorded in the so-called transitioning countries such as Tunisia (transition completed) and Morocco (gradual transitioning), countries in which the EU has been able to provide a significant variety of its forms of engagement and modalities of support to CS.

In the countries having been the subject of a field visit: Palestine, Morocco and Israel, the impact of EU support is all the more important when:

- Long-term support is provided to initiatives and organisations combining service delivery and advocacy: Morocco, Palestine, Israel.
- Support is provided to organisations combining activism and professionalism.

In both cases, CSO initiatives contribute to shedding light on various public problems that are little or weakly dealt with by the public authorities, who, eventually, address them in the context of reforms. CSOs are particularly avant-garde in promoting and protecting human rights and rights of women, child, migrants and refugees, people with disability, etc.

In Palestine, Israel and Morocco, and also in Lebanon and more recently in Tunisia, partnership with INGOs and participation in integrated programs allowed a significant transfer of skills towards the national CSOs which have capacity to lead their own advocacy campaigns.

Finally, in these countries there is a greater possibility of mainstreaming civil society within the framework of the EU's policy of cooperation with the State. Civil society is an actor in the democratic governance of policies in many sectors in which it is an interlocutor of the public authorities.

3. Limitations to impact

The main factors limiting the impact of the EU's support to CS for inclusive and participatory governance are linked to the political context of the EU partner countries.

i. Policy work comes with political work

The organisations supported by the EU and which have the most impact in terms of democratic governance are generally situated to the left of the political spectrum and are in opposition to the organisations of political Islam whose parties have won the elections in the most countries after 2011. Policy dialogue and cooperation relations between the State and EU-supported CS are reduced due to political antagonisms. In this case, the EU finds itself in the uncomfortable situation of supporting both the Islamist governments and the opposition CSOs.

ii. Division within civil society

Divisions within civil society are a factor limiting the impact of their advocacy with the state. Divisions exist in relation to leadership, individual agenda, and also in relation to different approaches and strategies. Dependent on external aid, the CSOs contributing to democratic and inclusive governance are also in competition with each other to benefit from EU support.

Judgement Criterion 4.1

EU's engagement with civil society has contributed to the increased capacity of civil society organisations and actors to perform their roles as independent development actors in the Neighbourhood South

EU's support to CSOs, mainly through action grants allocated by CfP over the period in the region have enhanced the professionalisation of civil society, in the following ways:

- as service providers, in all sectors and in particular on human rights (protection and rehabilitation / inclusion of victims of rights violations or discrimination). From the services provided to the direct beneficiaries, CSOs can build advocacy strategies;
- Professionalisation is particularly appreciated in terms of project management capacities. Strong dissemination of results-based project management, including more and more sub-granting, is seen;
- This process of professionalisation supported by the EU can all the more happen through a long-term partnership with INGO.

Nevertheless, there are several limitations to achieving long-term impact.

- Usual suspects: as access to funding is limited to organisations with existing capacity capital and level of professionalisation, the effects of the EU's financial support for CSO capacity relate to number of organisations acting as intermediaries between the EU and other organisations.
- There is no continuity in the funding of initiatives, because of the project approach and the competition of the CfP.

From the point of view of the CSOs, the commitment with the EU poses risks: The EU grants implies an important recourse to the salaried personnel for the implementation of the activities and the management of the project, which implies in return to enjoy at least financial stability to develop the organisation and activities on a sound basis, including with trained staff. This leads to a strong dependence on the EU and the donor community, the capacities of organisations fluctuating with the funding and the employees available. The lack of continuity in project financing and systematic competition between CSOs weakens most CSOs.

**Judgement
Criterion 4.2**

EU's engagement with civil society has contributed to the promotion of conducive environments for CSOs and broader civil society actors in the Neighbourhood South

The EU's contribution to creating an enabling environment for CSOs during this period can be described as weak.

All countries in the region were hit by a wave of democratic protest, engaging some of them (such as Tunisia) in democratic transition processes. The EU was strongly criticised for its lack of engagement with civil society, democracy and human rights before 2011.

The EU has distinguished itself in countries like Tunisia that have experienced a positive democratic transition process and its support has contributed to the creation of a favourable environment for CSOs.

The EU's promotion of a CSO-friendly environment has had little impact in other countries in the region, where the general trend of reducing civil liberties has been observed, although to varying degrees.

Not having the incentive of accession to promote a favourable environment - as is the case with the countries engaged in the enlargement process - the EU has two levers in the Neighbourhood South: financial and political, through a diplomacy of human rights. The differentiated approach is essential since there are two main categories of countries, in relation to the CS environment: (i) countries in which the environment is historically and relatively favourable for CSOs and where the EU's objective 1 is not a priority (Israel, Lebanon, Palestine); and (ii) countries with a strong authoritarian tradition and in which the action of the CS is highly regulated and controlled.

Over the period, only Tunisia has evolved positively and joined the "club" of countries in which the environment is rather favourable. The other countries with an authoritarian tradition either sank in the civil war and the dictatorship (Syria, Libya, Egypt), or maintained a status quo, showing signs of opening while maintaining authoritarian practices (Morocco, Jordan, Algeria). Apart from the support given to the Provisional Government in Tunisia between 2011 and 2014, which has produced significant positive effects leading to a successful democratic transition, the financial support deployed by the EU as well as its human rights diplomacy has not influenced the institutional and political environment of CSOs in the ENP countries.

Due to the principle of enhanced differentiation and ownership, the EU's objectives are not applied in the same way, depending on the level of authoritarianism of the regimes or the degree of advancement in the democratic transition. In countries where civil and political spaces are open, the EU can deploy all instruments and forms of engagement at its disposal. On the other hand, with authoritarian countries, the EU is opting instead for a pragmatic line, pursuing cooperation with countries that are clearly falling back on the rule of law, arguing that dialogue can also be used to lobby for human rights concerns, and that continued cooperation is always more beneficial than lack of cooperation. This position has a cost, which is to subject the action of the EU to CSO criticism, expressed at national and regional level (CS Forum South), denouncing the EU contradiction between, on the one hand, the pursuit of ambitious democratisation objectives through support for civil society and, on the other hand, significant financial support for governments using authoritarian practices that often target CS, while acknowledging and deploring the fact that civic space has been shrinking in the region.

The shift made by the EU after 2012 was successful, with plentiful and diversified financial and non-financial supports, available for CSOs willing to engage as governance actors and participate in policy process. This successful shift is based on NSA / LA's proven track record in local development, continued after 2012 in programmes dedicated to civil society support in the context of the promotion of participative democracy.

For the CS participation in domestic policies, there is progress in Tunisia, particularly under the action of Euromed Rights and its partners for tripartite dialogue²¹, the first experience of its kind in the region. In 2017, the Delegation of the European Union in Tunisia won the prize for best practices for the establishment of a tripartite dialogue including civil society²². Many sectors in Tunisia in which CS engage in policy action are identified, as for Morocco. In Palestine, the level of capacity of the CS is relatively high in terms of participation in the policy dialogue.

In these three countries, the common point is the existence of strong CS networks and coalitions. Palestine and Morocco can be singled out as countries with a deep tradition of network and associative movements. More recently in Morocco, there is a success story related to the associative movement on disability. This has gradually become more structured throughout the evaluation period so that, in 2019 it has become a recognised interlocutor with public authorities, and enjoys a strong institutionalisation (certain organisations have been designated to sit on the Economic and Social Council of Morocco or to be represented on the National Council of Human Rights).

The most effective networks are those that are built from a social action practice so to carry messages to public authorities or provide expertise during policy work. It is therefore important not to separate service and policy.

Finally, one of the essential variables that explain the difficulties of the policy dialogue between CS and State is politics. In Tunisia and Morocco and Egypt, where Islamist parties won elections from 2012, relations between the government and the EU's CSOs have deteriorated significantly, based more on confrontation than cooperation, and denouncing government action.

If the participation is not structured, the fact remains that some organisations have social capital of influence allowing them to participate informally in policy dialogue, because of all sorts of affiliations (political) and interpersonal interconnections.

In countries with limited civic space, policy dialogue is possible, with strong control by the regime, and in areas or sectors defined by the regime (usually social sectors). In these contexts, the regional programmes have also shown their usefulness in giving more space for dialogue.

In relation to structured CSO participation in EU programming cycles, there is no country in the Neighbourhood South region where the EU is engaged in a structured dialogue with the CSOs. The consultations take place during the programming phase of the financial support, but there is no real policy dialogue between the EU and the CS on government action, as consultations with the CS in the context of EU support for government (budget support) take place only once at the time of programming, more like information sessions.

Palestine is the country closest to this achievement of a structured policy dialogue due to the historical presence of the CSOs' platform for dialogue and the continued support provided by the EU to the various networks structuring the Palestinian associative field. Progress is recorded in Morocco and Tunisia, but depends on CSO capacities by sector. In Tunisia, one must consider both the inexperience of the majority of CSOs and the weight of certain national organisations such as the Tunisian General Labour Union (UGTT).

Finally, in countries with limited space, the objective of a structured political dialogue involving civil society is unrealistic, and priority is given more to political dialogue on the issue of human rights.

²¹ "Dialogue tripartite Société Civile – Tunisie – Union Européenne, EIDHR, 2016-2019,

²² https://eeas.europa.eu/delegations/tunisia/19729/node/19729_sq

EQ5 (Sustainability): *To what extent have the changes to which EU support have contributed proved to be sustainable after the end of EU funding?*

In all countries, CSOs operating as an actor of development, governance and democratic change are dependent on external aid funding, as they do not have adequate funding sources in their country.

EU funding is allocated through competitive tendering through the CfP, it is limited in time (2-3 years) and punctual.

The provision of services to vulnerable or victims of human rights violations is an alternative of civil society to the absence or poor quality of the services provided by the administration. The associative action is a response to an institutional lack. This requires continuity of support as long as needs are present.

Initiatives related to capacity building, advocacy and policy work also require long-term and iterative support as they embrace multiple processes of change that evolve according to the political economy of the country and the sector. Building legitimacy and expertise to be in dialogue with public authorities is a long-term process for civil society organisations.

An organisation that performs good management of its EU funding has sufficient organisational capacity to raise funds to the international community at large, after the end of EU funding. However, EU funding poses a significant risk of destabilisation for organisations receiving it for the first time. Indeed, the amount of funding, generally larger than usually managed, challenges the CSO's absorption capacity, during implementation, but also after, at the end of funding when the drop in cash prevents from maintaining trained staff. The risks are more limited for organisations that are already in high capacity with a greater diversity of financial partners.

The sustainability of the effects has been identified in the following cases:

as with the impact, the sustainability of the effects is all the more important when EU funding is repeated over time to sustain change processes, at the organisational level of CSOs receiving support, but also at the level of governance between stakeholders and relations of CSOs with public authorities;

sustainability of the effects of one-off financial support from the EU can be important when the initiative supported constitutes a specific axis of a much broader strategy carried by a CSO with a significant social base, combining activism and professionalism.

**Judgement
Criterion 5.1**

The results achieved through the EU's support and engagement with civil society allow the beneficiary organisations and actors to continue to operate as effective actors in the civic and governance realms

In EU documentation and interviews with EUDs, sustainability of the effects of EU support to civil society is appreciated in terms of the continuity of financial support for the initiative undertaken, beyond the duration of the project. However, the use of action grants through CfPs does not favour long-term support for organisations, whereas initiatives on qualitative long-term processes (capacity building, policy dialogue) require repeated support. The sustainability conditions of the actions undertaken are also presented from the capacities that are strengthened, and mainly the capacities of raising, managing and absorbing EU funds, as presented by the EUDs in Egypt and Lebanon, and most ROMs reports.

Longer term effects are observable for organisations that have been engaged in a professionalisation process. Nevertheless, the sustainability of the effects also depends on the level of development of the beneficiary organisations and the share of the EU funds in their organisation. If the EU-funded project falls into one of the organisation's strategic objectives, this means that the organisation has a strong capacity to raise funds and can bear the financial risk of not renewing EU funding. When selecting proposals, EUDs seek to avoid targeted actions that are limited in time and which do not correspond well with the activities of the organisation as a whole.

There is often a problem of design in the comprehensive support programmes for civil society, which are generally conceived around needs rather than changes, and which do not take account of the process dimension inherent in the development of capacities, nor the organisational trajectories of CSOs.

The most important effects can be seen in a limited number of organisations who are able to position themselves on several CfPs at a time and to manage several EU grants at the same time, implementing sub-granting mechanisms. These are intermediary organisations at national or regional (sub-national) level, serving as intermediation between the EU and the rest of the organisations.

As far as enhanced participation of the CS is concerned, sustainable impact is more likely when participation is structured within networks and a coalition framework. Political dialogue involving civil society is a long-term process, involving sustained support at the organisational level.

**Judgement
Criterion 5.2**

The design and implementation of EU interventions and activities have facilitated sustainability

Criteria and sustainability conditions are mainly presented in the project documents and in the responses of the surveyed EUDs, from the point of view of continuity of funding. In this sense, the dominant idea is that the EU funding management experience complemented by targeted training activities strengthens the funding capacity of local CSOs to ensure the continuity of their activities. Capacity building can be done as part of a transfer of competence within a partnership between an INGO and one or more CSOs.

The analysis of ROM reports shows that the sustainability factor common to all projects is the level of ownership by local partners, without indicating that a strategy in this sense has been launched or even defined. For EUDs, sustainability is a requirement in the identification of the actions as project proposals are required to develop phasing out plans. Phasing-out modalities are explicated in the final report of the project provided by the beneficiary recipient. Nevertheless, interviews with EUDs show that there is no follow up so to verify whether phasing-out measures have contributed to the sustainability of the intervention.

Finally, there is a broad consensus within the EUDs and CSOs that the very nature of some activities is a challenge in terms of sustainability:

The provision of services to vulnerable or victims of human rights violations is an alternative of civil society to the absence or poor quality of the services provided by the administration. The associative action is a response to an institutional lack. This requires continuity of support as long as needs are present.

Support mainly related to capacity building, advocacy and lobbying initiatives would be difficult to take necessary phasing out measures and ensure sustainability.

EQ6: (Coordination, Complementarity, Coherence): *To what extent have the various forms of EU engagement (including policy dialogue and financial support) with civil society in the Neighbourhood South been effectively coordinated, complementary, and coherent with the activities of EU MS and other donors?*

The EU's coordination efforts with the Member States in support of civil society have been continuous and have made a quantum leap with the introduction of the CS Road mechanism. Nevertheless, the level of coordination varies from country to country, and fluctuates with the weight of bilateral MS interests with partner countries and their historical and political relationships. In these contexts, the CS Roadmaps have been a laborious process, giving birth to sometimes general and vague documents. The weakness of the Roadmap is that it is a programming document, so no reporting is done on the priorities identified.

In terms of coordination between the EU and the MSs, Palestine is the country where the level of coordination is highest: the second Roadmap for the next five years has been developed (the only one at the time of the evaluation) and is aligned with the joint strategy. Palestine is the only country where there has been joint programming between the EUD and the MSs, in which support to CSOs is clearly mainstreamed.

In all countries there are donor working groups, sometimes directly coordinated by the EU (Egypt, Tunisia). None of these groups are dedicated solely to civil society, but new projects and future perspectives with CSOs are on the agenda of the meetings.

Otherwise, at the implementation level, synergies are not always identified or exploited, as observed during documentation review, field visit and interviews in Morocco, Algeria and Tunisia, between the EU and the Spanish or the French cooperation agencies.

Coordination between states and non-EU organisations is even more challenging as these entities operate according to their own agenda and regulations, policy and objectives. The United States is a player comparable to the EU in the region, both in terms of country coverage, volume of support, and of democratisation policy objectives. For CSOs, USAID can be an alternative if proposal in response to EU Calls for Proposals are not successful. In some cases, as observed in Morocco or Palestine, this gives rise to separate groups, with the EU-supported CSOs on the one hand and the USAID-supported CSOs on the other.

Private American foundations such as the Ford Foundation are also a major player, particularly in supporting human rights defenders in the Middle East. In the case of the withdrawal of funding for American cooperation from the Palestinian territories, in particular for Palestinian and Israeli human rights NGOs, the EU becomes the main donor for the human rights sector both in Israel and Palestine.

These North American actors have been rarely included in the coordination mechanisms put in place by the EU over the period. Coordination and complementarity can take place during the identification and programming phases through stakeholders' meetings led by a technical assistance (Morocco).

Judgement Criterion 6.1	Links between policy work, multi-stakeholder dialogues (e.g. fora) and financial support were effectively established and coordinated in the Neighbourhood South
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The coordination of EU support to the CS is all the more necessary as a result of it being delivered through many different instruments and modalities of engagement from different EU directorates and services, as required by law. Silo management has long been the norm, and it still prevails in the EU-CS regional dialogue mechanisms, structured by instrument/theme.

Coordination has been facilitated by the fact that all the instruments, while endowed with their own specificity, are aligned through policy. This gives EUDs the opportunity to use the instruments in a complementary way. CS mainstreaming and the development of comprehensive support programmes have given more room to the EUDs to engage in different and converging initiatives with civil society. Active coordination between the Desks, CoTE, DEVCO in Brussels and the cooperation sections of the EUD, at least at the programming stage, has also helped to facilitate coordination.

In most countries, there is a strong coordination between the political and cooperation sections regards human rights, and the EIDHR.

Judgement Criterion 6.2	The combined efforts of the EU and EU Member States and other donors have led to a coherent and complementary response to the needs of civil society.
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The EU's coordination efforts with the MSs in support of civil society have been continuous and have made a quantum leap with the introduction of the CS roadmap mechanism. Nevertheless, the level of coordination varies from country to country, and fluctuates with the weight of bilateral MS interests with partner countries and their historical and political relationships. In these contexts, the CS roadmaps have been a laborious process, giving birth to sometimes general and vague documents. The weakness of the roadmap is that it is not about programming document, so that no reporting is done on the priorities identified.

In terms of coordination between the EU and the MSs, Palestine is the country where the level is the highest: the second roadmap for the next 5 years has been developed (the only one at the time of the evaluation) and is aligned with the joint strategy. Palestine is the only country where there has been a joint programming between the EUD and the MSs, in which support to CSOs is clearly mainstreamed.

In all countries, there are donor working groups, sometimes directly coordinated by the EU (Egypt, Tunisia). None of these groups is dedicated solely to civil society, but new projects and future perspectives with CSOs are on the agenda of the meetings.

Judgement Criterion 6.3	Synergies were achieved and duplication of efforts of the EU, EU MS and other donors was avoided in the Neighbourhood South
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Synergies at the political level between the EU and the Member States are all the more important in the case of a joint programming context as in Palestine.

At the implementation level, synergies are not always identified or exploited. Several cases illustrate this.

- In Morocco, Spanish cooperation along with USAID have been important players in the field of participatory democracy and local governance. Lessons learned from this long experience could have been shared during the development of the Moucharaka programme. The last USAID's implementing partner for the last CS programme has been consulted by the TA in charge of the Facility Program, and one of the Spanish NGOs has benefited from a grant under the Moucharaka program. Nevertheless, no coordination between EUDs and AECID or USAID could be noted.

- At a regional level, relations between the EU and French cooperation, and certain specific programmes that the latter supports, illustrate to what extent synergies are exploited or not. In the 2000s, French cooperation, whose portfolio of support to civil society goes to AFD, developed a specific programme of support for civil society, called the Multi-Actors Concerted Programmes (PCPA). These programmes adopt the participatory approach in development, through objectives of strengthening CS capacities as actors of development and democratic governance. The specificity of these programmes is to be part of processes of change and run on average over a period of 10 years. They put in place a sub-granting mechanism to reach as many organisations as possible in the territories. The PCPAs are based on a particular institutional setting, bringing together French NGOs and their local CS partners, as well as local authorities and public authorities (particularly sectoral ones) from France and the partner country.

Synergies have been exploited in Algeria through co-financing of the PCPA programme by the EU on several occasions. The EUD was able to rely on the sub-granting mechanism put in place in the programme to channel its funding as well. In 2018, the EUD launched, with the Algerian authorities, its own support programme integrated with civil society, on the theme of participative democracy and local development (but the civic and popular protest movement arrived in 2019).

In Tunisia, the PCPA was launched in parallel with the launch of the PASC. No synergy was exploited while the EU PASC did not have a sub-granting mechanism. The programmes could appear complementary in that they were not located in the same region. The PCPA enters its third phase while the development of a second programme of support to the CS is still ongoing.

In Morocco, the PCPA ran from 2002 to 2014 and was a forerunner (as USAID through SANAD programme and the Local Governance Programme) in support of CS in the framework of participatory democracy and local development, especially among young people. It is interesting to see how these programs have tested the youth councils at the municipal level, mechanisms that have been instituted (at the regional level) by the different legislative texts that have succeeded each other since 2012, and on which the Moucharaka programme of the EU will be able to rely.

EQ7 (EU Added-value): *To what extent have the various forms of EU's engagement with civil society in the Neighbourhood South over the evaluation period had characteristics which distinguished it from that of other actors?*

**Judgement
Criterion 7.1**

EU support to civil society in the Neighbourhood South has had a distinctive feature in comparison with that provided by other actors, based on its comprehensive and multi-faceted approach

The combination of the three forms of EU engagement with civil society is not a distinctive feature in itself. What distinguishes the EU from other donors is that (i) these forms are governed at a political level, (ii) their application tends to be systematic and extended to all sectors of cooperation, while other donors can apply these three forms of engagement, but on an ad hoc basis or on specific topics.

In its implementation this evaluation has seen a difference depending on the political and institutional setting of the countries, notably regarding the civic space granted for CS. In countries with restricted space, the deployment of mainstreamed support to CSOs as well as the policy level engagement (facilitation of policy dialogue between the CS and the State) is much more limited than in transitioning countries to democracy. In countries with a more open civic space, the combination of forms of engagement with civil society can be applied and does not seem to be a distinctive feature of the EU's support.

It has been observed, however, that the MSs, engaged with the government as well as with the CS through technical and financial support, strive to mainstream the CS in the different sectors / priorities of cooperation, and to engage in a political dialogue when human rights are of a priority in the MS's cooperation policy. Dissemination of EU concepts and approaches was disseminated as part of the Roadmap process. Many MS join the EU in the support budget (Morocco) or in joint programming (Palestine).

The distinction between the EU and the Member States in support of civil society lies in the financial and implementation modalities. The direct award practice is appreciated by all surveyed and interviewed CSOs, and by EUDs employees who have experienced this type of modality, in crisis situations such as in Palestine or in the case of operating grants in Palestine and Morocco. This modality makes it possible to engage more in partnership relations with the CSOs by co-constructing the interventions. For the CSOs, it mainly ensures financial stability that offsets the instability resulting from the CfP.

EU action grants directly allocated to CSOs as main applicant is the result of a long process of capacity development and the contributions over time of INGOs, foundations or directly by the Member States, engaged in a more partnership-type relation with the CSOs. Therefore, it can be said that the supports of these actors have contributed to lever their partners' capacities to access to EU funding, especially that the EU has remained the main player providing financial support to CSOs (all countries combined).

Finally, from 2012, the EU has distinguished itself by developing a support programme integrated with civil society. It should be recalled that similar support had been provided by some members (France, Spain) and other countries (USAID) over previous periods, and especially during the pivotal period between 2009 and 2012. The programs developed by the EU gave mixed results and were in 2012 and 2018 (depending on the country) in a phase that can be qualified as of experimentation. These programs, with their reinforced design, remain relevant and should bear fruit.

EQ8 (EU-Added value): *To what extent could changes, which the EU contributed to, have happened in its absence?*

Judgement Criterion 8.1	EU support has been an essential factor in contributing to significant change in the sphere of civil society development in the Neighbourhood South
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The EU is the main actor of CS support in all the countries of the region and as such plays a leadership role in many aspects of coordination.

- The EU's contribution to the democratic transition in Tunisia is widely recognised by all stakeholders interviewed.
- In Morocco, other actors such as AFD and USAID have been more precursors with programmes like the PCPA, SANAD and the PGL, centred on democratisation and local governance objectives by supporting civil society before 2011. The EU has subsequently been able to redeploy its interventions on these themes.
- In Palestine, the recent withdrawal of USAID, but also of the FORD Foundation - a key player for the human rights movement - places the EU, and other MS, in a "monopoly" position in the human rights field, which has long been the case in Israel.

3. Neighbourhood East

EQ1 (Relevance): *To what extent have the EU's objectives and approaches to its engagement (policy dialogue and financial support) with civil society properly addressed the variety of problems faced by / needs of Civil Society actors in the Neighbourhood East over the evaluation period?*

Judgement Criterion 1.1	The EU's objectives with regard to its support to civil society have evolved effectively in line with the needs of civil society actors over this period in the Neighbourhood East.
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The EU's objectives with regard to its support to civil society in the Eastern Partnership were aligned with the intended outcomes and impact. Civil society interviewees and survey respondents mostly consider EU objectives as highly relevant. The most positive survey and interview responses come from Armenia. In Azerbaijan, some CSO interviewees suggested that EU objectives are admirable, but cannot easily be reached in the restrictive local environment.

Across all data sources, the three priorities of the COM (2012) are consistently presented and well understood by stakeholders: 1) enhancing efforts to promote a conducive environment for CSOs in partner countries; 2) promoting a meaningful and structured participation of CSOs in domestic policies of partner countries, in the EU programming cycle and in international processes; and 3) increasing local CSOs' capacity to perform their roles as independent development actors more effectively.

These are the EU's global priorities for cooperation with civil society. They overlap with the outcomes of the RIL for this evaluation in terms of strengthened democracy and greater dialogue between stakeholders in the partner countries. They are compatible with, but do not directly address the RIL's regional outcomes and impact, which the EU is presumed to be working towards.

All three objectives are well aligned with the intervention logic, reconstructed for the purpose of this evaluation. Objective 1 contributes to all three outcomes by helping civil society contribute to strengthening democracy. Objectives 2 and 3 are closely aligned with the outcome related to policy dialogue between different stakeholders. All three objectives contribute to key impact areas, notably stronger civil society contributing to shared prosperity and good neighbourly relations in the region.

Over the course of the evaluation period, the EU's foreign policy objectives have consistently focused on promoting and supporting civil society, with support to this sector increasingly emphasised. Findings from the review of policy documentation²³ and previous evaluations demonstrate that the EU, in its external action policy, has increased support for civil society as a sector, and also undertaken more development activities in which CSOs are key partners or beneficiaries. CSOs from Armenia and Ukraine noted in particular the relevance of EU objectives and value generated by the EU's support to the sector. Although there is no single EU civil society policy document, the multitude of policy frameworks translate into a high level of prominence afforded to civil society issues in the EU's strategic objectives, as well as in its approaches, instruments and modalities (See JC 1.2.). A strong policy focus on civil society is recognised by all stakeholders in the region as one of the distinguishing features of EU policy.

EU objectives in the civil society space evolved during the evaluation period. 2008 was a landmark year with the emergence of the Eastern Partnership Initiative promoting stronger oversight of public service delivery. In 2011, the "more for more" principle was introduced. In 2012, the Communication on Civil Society confirmed the EU's focus on three priorities of civil society support, as mentioned earlier.

EU approaches also evolved. 2014 saw the introduction of country roadmaps as a tool for strengthening EU engagement with civil society and improving coordination between the European Commission and the Member States. In 2015, the ENP Review promoted the principle of flexibility to support rapid adaptation of EU support to the sector in response to changing political circumstances and priorities

The EU's objectives with regard to engagement with civil society in the Eastern Partnership region have become more nuanced and tailored to individual countries. Over the course of the evaluation period, the EU has reinforced its strategic engagement with the Neighbourhood East region through the launch of the Eastern Partnership Initiative. The EaP resulted in reinforced consultations with civil society actors and organisations in developing EU objectives, including through the creation of a dedicated regional civil society network, the Eastern Partnership Civil Society Forum (see JC1.2). The EU has gradually moved from a 'one size fits all' approach to the entire neighbourhood, towards individual country action plans, which set objectives in cooperation with national stakeholders including governments as well as civil society actors and organisations. This approach supported an evolution in EU objectives towards ensuring alignment with the specificities of the needs of the civil society sector in individual countries.

The EU has responded well to changing political realities on the ground in the countries of the region, adjusting the objectives of civil society engagement in line with the needs and problems faced by civil society in the countries in question. For example, in Ukraine, the last five years of the evaluation period saw a significant transformation of objectives in relation to civil society in response to the changing needs of both the government and civil society as well as the new geopolitical reality facing the country. The EU offered strategic assistance to the Ukrainian government in reforming its administration, economy and public policy, with significant civil society involvement as both stakeholder in consultation processes and beneficiary of assistance.

EU recognition of the role of CSOs as actors in development has influenced the mixture and relative importance of development and transitional priorities that are addressed. For example, one recent study suggested that the relatively high attention to child protection issues in the countries covered by this evaluation, compared to other countries at a similar level of development "may reflect a higher political priority allocated to children's rights issues in the relationship between the EU and these countries." These issues are all common commitments in partnership agreements and GSP+ agreements.²⁴

Civil society actors in the region acknowledge the EU's efforts in engaging civil society in consultations over objectives, although also cited several reservations regarding the effectiveness and impact of the consultation processes. Civil society actors in the region appreciate the EU's efforts to consult civil society and engage through different consultation formats, but voiced concerns regarding the efficiency and impact of the

²³ ENP reviews (2011 and 2015), 'Roots of Democracy' (2012), 'Coherence Report - Insights from the External Evaluation of the External Financing Instruments' (2017)

²⁴ Armenia is the only IPA and ENI country benefiting from GSP+.

consultation process, most notably in countries with restricted spaces for civil society. In Armenia, Georgia, Moldova and Ukraine, most stakeholders note that the EU has become more engaged with a wider variety and number of civil society actors. The National Platforms of EaP CSF were highlighted as the largest networks for EU-EaP country dialogue, alongside CEPA/AA bilateral platforms, but civil society stakeholders also recommended that they should be complemented by wider consultations with other networks, in order to promote a broader representation of interests. In Azerbaijan and Belarus, civil society stakeholders reported that, due to restricted spaces for civil society, consultation formats are limited and consultations taking place do not guarantee adequate levels of input due to governmental interference and/or control. Civil society interviewees and survey respondents, as well as EU staff, recognise the Roadmaps for EU engagement with civil society as a useful tool.

Judgement Criterion 1.2	The EU's approaches to supporting and engaging with civil society have evolved effectively in line with the needs of civil society actors over this period in the Neighbourhood East.
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The EU's approaches to supporting and engaging with civil society in Eastern Partnership are in alignment with the activities and outputs articulated in the intervention logic. Activities identified under the evaluation included capacity-building measures for CSOs at national and local level, regional capacity-building activities, capacity-building for governments and civil service, policy dialogue, co-operation between civil society and government, twinning and partnership for CSOs in EaP and EU and were disbursed through action grants, partnership agreements, operating grants, direct grants as well as direct budget support (in Armenia, Moldova, Georgia and Ukraine). Outputs included increased CSO capacities to engage in policy and advocacy, creation of networks, equipping governments and CSOs with better capacity to work together, and links between CSOs in both EaP and EU countries.

Over the course of the evaluation period, the EU has gradually increased its engagement with civil society by reaching out to a more diverse range of civil society actors. In line with the EU's increased focus on civil society as a strategic partner and beneficiary of EU assistance, the EU has increased the range of different civil society actors it engages with to include interactions with community-based organisations, faith-based organisations, foundations, research institutions, professional and business associations, not-for-profit media as well as social partners such as trade unions. Most stakeholders in the region note that there is space for further broadening of engagement to strengthen the contribution of actors beyond the 'NGO' communities, as well as organisations located outside capital cities and in rural areas.

Over the course of the evaluation period, the EU was able to react to changes on the ground and effectively respond to changing needs in most cases. The political and economic situation changed rapidly in EaP countries, and the position and needs of civil society in all six countries has also been altered over the period. For example, in Armenia, in 2018, the EU was able to react promptly to political changes offering support to election monitoring and watchdog NGOs. In Ukraine, the EU significantly expanded its support for civil society after the 2014 Euromaidan revolution and provided support to CSOs across an increased number of sectors. In Azerbaijan and Belarus, as CSOs experienced more restrictions within both countries, the EU enhanced its support through third parties such as EED and organisations registered abroad, including in EU member states.

The EU employed different forms of engagement appropriate to the needs and problems faced by civil society organisations in the region. All three forms of engagement, i.e. targeted support, policy engagement and mainstreaming directly address the objectives defined in the relevant policy documents (see JC 1.1) and are duly considered in programming documents such as Roadmaps. Targeted (financial) support is widely perceived as the predominant form of engagement across all six countries of the region, and consists of a range of modalities. Policy engagement has been applied with mixed success due to differing realities of civil society organisations, notably the CSO environment and state policy towards it. Civil society stakeholders in Belarus note that, although the EU is using all opportunities to seek policy engagement of CSOs, the results are limited by the lack of the Belarusian government's interest in engaging CSOs. In Azerbaijan, civil society stakeholders report that the local EUD does not guarantee confidentiality of consultation processes in policy consultations thus limiting their scope. This confirms the validity of the assumption on the importance of commitment to civil society by national governments. Mainstreaming of civil society is least understood among local stakeholders but whenever it has been observed across all six countries in the region, it is positively regarded. In Belarus, the EU has been able to adjust to government restrictions placed on civil society, to the extent possible, by providing safe spaces for dialogue and engagement, even in hostile environments.

The EU expanded its choice of implementation modalities to better address the needs and problems faced by civil society in the region. The EU employs a wide scope of modalities across all countries of the region both

in bilateral as well as regional and thematic programming including bilateral, thematic and regional instruments, operationalised through service contracts, technical assistance, direct budgetary support framework partnership agreements, operating grants and projects involving substantial sub-granting components. The project modality is still the predominant form of support and, although the EU has gradually moved towards more strategic, long-term and institutionalised forms of support (for example providing larger grants to CSO networks to be further distributed through sub-granting over a number of years), significant needs in long-term civil society development remain. These include needs such as developing CSOs' skills in policy engagement in all relevant sectors of EU programming, financial sustainability of CSOs, and advocacy for a more enabling environment for CSOs and other civil society actors. Civil society stakeholders across all countries of the region appreciate the complementary character of interventions.

Outreach of EU civil society consultations focuses mostly on stronger organisations and networks.

EU interventions across the scope of its programming in the region are commonly based on, and include, an element of dialogue with civil society. Despite an expansion in the scope of engagement and consultation, EU outreach in consultations remains limited to larger and stronger networks, usually concentrated in capital cities and larger urban centres in all countries of the region. This is partly a function of the structure of civil societies in the countries in question, where large groups of organisations cluster around donor presence and other resources. It also confirms one of the RIL assumptions on the importance of civil society consultations at all levels for the EU. Furthermore, the focus on a large-scale, systemic change often warrants the involvement of large actors able to engage with other stakeholders on a strategic level. Absence of wider grassroots contributions to EU consultations limits the mobilising potential of its engagement and outreach to communities and constituencies that civil society actors and organisations work with.

In countries with limited spaces for civil society, EU engagement is constrained by restrictions on grant beneficiaries. Forms of constructive engagement have been explored. This has typically involved engaging with CSOs that strictly maintain a technical profile, as well as some CSOs that are more aligned with the policy priorities of partner country governments, compared to the pro-European or liberal CSOs which have been key partners for the EU in these countries over the years. The liberal CSOs interviewed for this evaluation were sceptical about the potential positive impact of this engagement. They tend to interpret the EU approach as the result of weaknesses in analysis and or concessions to regimes in place, rather than a strategy of constructive engagement. In the view of liberal and pro-European CSOs, working with civil society 'politically safe' issues such as environment or gender equality does not respond to important civil society needs and priorities, and is a way of legitimising governments in the region, including those that pursue policies of shrinking spaces for civil society.

EQ2 (Efficiency): *To what extent has the scale of resources deployed been justified considering the changes/results produced? To what extent have efficiency gains, or losses, occurred?*

Judgement Criterion 2.1, 2.2 and 2.3	The scale of resources deployed for targeted (JC 2.1), mainstreamed (JC 2.2) and policy engagement (JC 2.3) support has been appropriate in the Neighbourhood East
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At the regional level, and in five of the six countries, there is no clear relationship between total relevant spending and the challenges and opportunities facing civil society.

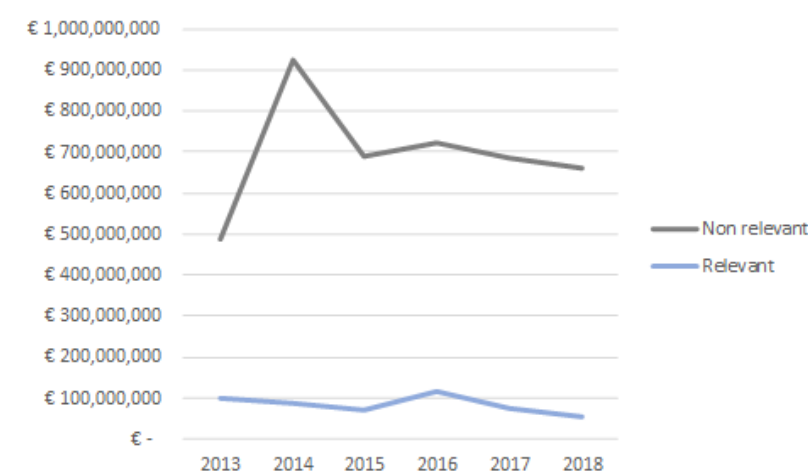
In Azerbaijan, relevant spending increased as the space for civil society shrank. This may reflect the EU search for constructive engagement with authorities on non-controversial themes where the role of civil society can be showcased.

Looking more closely at selected themes of CSO engagement, the evaluation has yielded mixed findings. Regarding migration, refugees and IDPs, the EU supported a large number of CSO actions in several countries covered by this evaluation, representing almost 8% of total EU spending on these themes in these countries. The EU significantly increased its support to CSO work on migration/refugee/IDPs in Ukraine in 2015 and 2016. However, there was almost no EU support to relevant CSO actions on these themes in Belarus and Moldova. The evaluation did not identify a clear relationship between EU spending and the intensity of human trafficking in any of the six countries.

Targeted, mainstreamed and policy support to CSOs has remained relatively stable in recent years. Since overall EU support to these six countries has increased very significantly during the same period, the relative importance of CSO support within the overall portfolio of EU cooperation with the six countries has fallen dramatically. This trend is illustrated in the following chart.

The relative stability of relevant support in financial terms is surprising, considering that the EU has since 2014 indicatively earmarked 5% of ENI funds to civil society. Yet, the impact of this declared commitment is not visible in our analysis of the value of relevant contracts signed since 2014. In interviews, EU staff suggested that this may reflect absorption capacity limits in some countries (Belarus, Azerbaijan, Armenia were most often mentioned). It is less clear why spending remains relatively constant in Georgia, Moldova and Ukraine.

Figure 1 Level of funding (EUR) for EU support to CS 2013-2018 in the EaP compared to other types of support



Source: Landell Mills' analysis of CRIS data on all relevant (targeted, mainstreamed and policy) and other ('non relevant') contracts with an action location in the six countries covered by this evaluation during the period 2013-2018.

Overall, it can be said that the EU continues to attach importance to support to CSOs in these six countries, and has committed to arrangements that should result in increased funding, but this process has not yet brought tangible results.

Since non-CSO spending has increased, CSO support has become a relatively less significant proportion of overall EU cooperation with the region, at least in financial terms. The reasons why EU support to CSOs has increased much more slowly than the rest of EU support to these six countries is outside the scope of this evaluation.

Of the few themes examined in more detail, those in which EU support to CSOs has increased proportionally to the overall increase in EU support to the six countries are

migration/refugees/IDPs, with Ukraine responsible for most of the increase in spending (CSO and non CSO alike).

Short-term results of EU support to CSOs are well aligned with the reconstructed intervention logic, with clear contributions of activities to outputs. In particular, output evidence includes increased CSO capacities to engage in policy and advocacy, creation of networks, equipping governments and CSOs with better capacity to work together on policy matters as well as stronger links between CSOs in the EaP and the EU.

Short-term results of EU engagement have been achieved in all three forms of support including targeted interventions, policy engagement and mainstreaming. Across all countries of the region and all stakeholder categories, high levels of satisfaction with these short-term results are noted. Civil society stakeholders consider that the formalised, project cycle management and output-oriented nature of targeted interventions are conducive to projects achieving their own objectives and contributing to the EU's higher-level goals (i.e. the Outcomes and Impact of the RIL). However, respondents also noted that the formal requirements in EU funding application processes tend to favour a focus on outcome and intermediate impact, without an equal regard for longer-term impact.

Regarding policy engagement processes, civil society stakeholders considered the most notable RIL outputs to be the regular and structured policy dialogue facilitation by the EU in all countries of the region, as well as familiarisation with EU institutions and policies and capacity-building for governments and civil service.

Regarding mainstreaming processes, civil society beneficiaries made similar remarks, notably concerning the EU's regular and structured mainstreaming of civil society in its programming.

Efficiency gains are widely reported, notably in relation to the growing use of the Financial Support to Third Parties modality. Stakeholders and interviewees across all groups including civil society and public authorities contend that 'sub-' or 're-granting' allows for the achievement of greater results at a lower cost.

Despite an increased level of funding and widening of the modality portfolio, local stakeholders commonly report that needs exceed the available levels of support. Across most countries of the region, civil society stakeholders state the need for continued, large-scale support for capacity-building, policy engagement and enhancing the enabling environment for civil society organisations. Belarus is the only

notable exception, where especially independent civil society actors note that EU civil society engagement delivered through international organisations and state as well as public institutions is inefficient and that funding levels should be curtailed until the situation of civil society has improved. Considering that nearly 30 million EUR in civil society-related mainstreaming support has been awarded to UNDP alone in Belarus in the period under evaluation, compared with over 53 million EUR in targeted support for civil society in the same period (see Chapter 5 for details), this is an important exception to the overall situation in the region. In other countries of the region, civil society stakeholders contend that resources are not sufficient to cover all needs of civil society and civil society organisations.

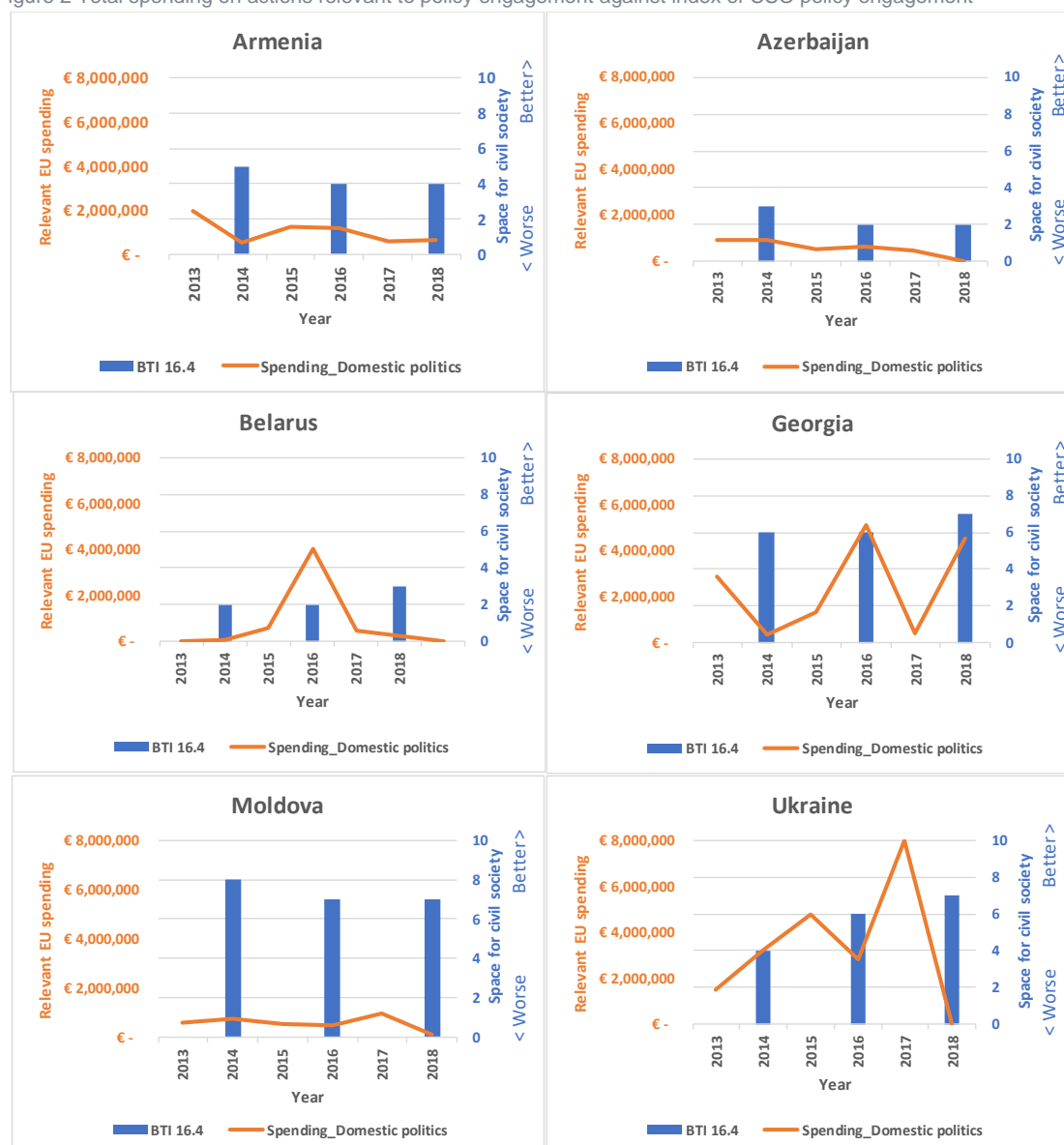
The EU has significantly expanded its outreach to grassroots organisations through targeted support, notably in smaller countries of the region. Civil society stakeholders across all countries of the region reported a visible shift in EU engagement with smaller organisations through targeted interventions, notably through sub-granting and re-granting. Grassroots outreach is easier in smaller and more geographically compact countries of the region, notably those with closer links with the EU (AA/CEPA). In Georgia and Armenia, significant progress has been achieved in reaching out to smaller civil society organisations, with a single EU intervention reaching as many as 10% of CSOs in one country. In Azerbaijan, shrinking space for civil society, including strict grant registration regulations, has severely limited the possibilities to interact with grassroots organisations. In Belarus, the outreach to grassroots organisations is more limited than in other countries, and the diversification effects have led to certain negative outcomes in the view of respondents, for example by increasing engagement with organisations that are seen as being connected to the government (including GONGOs receiving grants via ENPI/ENI), rather than with independent civil society organisations and actors. Due to a lack of consolidated data, such as monitoring reports, studies and evaluations, evidence relies mostly on qualitative assessment such as interviews, surveys and previous evaluations, both thematic and country-level, with some quantitative evidence at project level.

Civil society stakeholders note an increase in EU policy engagement activities across countries and modalities. Civil society stakeholders note that the EU has increased its policy engagement efforts across all countries of the region, and that engagement now happens across all modalities with regards to both national-level dialogue as well as bilateral EU-neighbouring country dialogue. Some civil society stakeholders across all countries of the region note that, although policy engagement is more widespread and that civil society engagement at the basic level (participation) can be taken for granted, higher forms of engagement are not universally applied. A number of CSOs in all countries of the region highlight the lack of co-decision making structures and lack of feedback to policy engagement initiatives as hindrances to effective policy engagement.

Support to relevant actions focused on policy engagement is somewhat concentrated on countries with more open environments. Spending in Azerbaijan and Belarus remained low throughout the years 2013-2018. Spending in Armenia was higher, but with a downward trend, in a context of medium openness compared to the other countries covered by this evaluation. Curiously, spending was consistently low also in Moldova, where the environment was significantly more favourable. Considering Ukraine's much larger population, spending per capita was also relatively low throughout the period, in a context of medium openness. In contrast, in Georgia, spending was relatively high throughout the period, in a context of medium openness with an upward trend.

The following chart analyses total spending on actions relevant to policy engagement (i.e. covering the targeted, mainstreamed and policy categories retained for this evaluation) against the index of CSO policy engagement, as produced by the Bertelsmann Institute.

Figure 2 Total spending on actions relevant to policy engagement against index of CSO policy engagement



Source: Bertelsmann Institute – BTI Index. EU data for all relevant actions, extracted from CRIS, coded for this evaluation.

EQ3 (Effectiveness): What have been the effects of the EU's various forms of engagement with civil society in the Neighbourhood East?

Judgement	The effects achieved through targeted (JC3.1), mainstreamed (JC3.2) and policy-level
Criterion 3.1, 3.2 and 3.3	(JC3.3) support to civil society have corresponded to the EU's initial objectives in the Neighbourhood East

The reconstructed intervention logic lists the effects of EU engagement in terms of immediate outputs and short- to mid-term outcomes. Outputs include strengthened CSO capacities to engage in policy dialogue and advocacy at national and local level, strengthened CSO networks and capacities for trans-national regional co-operation, higher capacities of EaP governments and civil services to work with, and for civil society, higher capacities of CSOs to engage in policy dialogue, improved conditions for participation of CSOs in policy dialogue, increased CSO knowledge of EU institutions and policies, enhanced links between CSOs from EaP and the EU as well as support for CSO activities and CSO perspectives in budget support activities.

Capacity development of civil society, notably capacity building of CSOs²⁵, is the most commonly reported effect of EU engagement with civil society in the Eastern Partnership countries across all

²⁵ CSO capacity-building activities cover a wide range of activities including fundraising, project management, financial management, human resource management, strategic planning and development, advocacy training and coalition-building.

forms of engagement. Across all countries of the region, effects in terms of capacity development include increased knowledge and competences of CSOs, increased capacity to interact with other stakeholders, including participation in policy dialogue with national governments, and increased capacity to provide services to clients. Stakeholders across all groups and countries highlight that all three forms of EU engagement result in increased capacities of civil society. In Armenia, civil society stakeholders report good capacity development throughout the period under investigation, adding that the EU is perceived as focusing on technical capacities and those related to bilateral relations with the EU and its member states rather than community outreach and civil society constituency work at local or national level. In Ukraine, civil society stakeholders shared similar conclusions, highlighting the results achieved through EU engagement on management, fundraising and policy engagement competences of CSOs. In Belarus, liberal or pro-Western CSOs note that capacity development is the most likely result of EU engagement, notably in areas perceived as less politicised such as environment, gender equality and volunteering, but are critical of modalities channelling support for civil society capacities through international organisations, public bodies and CSOs which they perceive as pro-government and/or created by government or by politically linked persons. ('GONGOs').

Interviewees commonly identified enhancing civil society involvement in policy cycles as an effect of EU engagement with civil society, but with important caveats regarding feedback to such engagement and impact of EU activities on national authorities. Civil society stakeholders in Armenia, Belarus and Ukraine reported high levels of achievement of results in terms of enhancing civil society in policy cycles, at least when it comes to most basic instances such as notification of policy processes to civil society and participation in policy consultations. Higher up the ladder of participation, achievement of results becomes more challenging. Civil society stakeholders in all countries of the region noted that instances of co-decision making by civil society actors are rare and measuring impact of policy engagement is not possible due to a lack of feedback and evaluation evidence. Furthermore, civil society stakeholders in all countries, notably those with shrinking spaces for civil society (Azerbaijan and Belarus), noted that results can be severely limited by a lack of co-operation from national authorities. In both countries, civil society stakeholders noted that the absence of EU participation results in a marked decrease in civil society involvement in policy cycles. Stakeholders in field mission countries (Armenia, Belarus and Ukraine) highlighted the importance of the EU's work with governments and the civil service and increasing their capacity to work with civil society actors. EU engagement achieves greater results in EU policy cycles, and less in domestic policy cycles where non-EU actors, such as national governments and public institutions, are involved.

The effects of EU engagement with civil society on developing an enabling environment for civil society are severely limited by the activities of national authorities. Across all countries of the region, effects of EU engagement in terms of developing an enabling environment for civil society are least frequently reported. In countries where national authorities undertake specific commitments regarding good governance in bilateral relations with the EU, such as AA/CEPA countries, an improvement of enabling environments for civil society could be noted throughout the evaluation period, as evidenced by the USAID CSO Civil Society Sustainability Index (See Figure 3). Civil society stakeholders in countries with shrinking spaces for civil society (Azerbaijan and Belarus), noted that civil society environments deteriorated in some or all aspects throughout the period under evaluation, and that the EU was unable to address this situation even in circumstances where EU engagement with civil society continued. This validates the reconstructed intervention logic assumptions about the importance of national institutions' commitment to support civil society and framework conditions conducive to democratic development.

The regional dimension of civil society engagement is overshadowed by national-level and bilateral relations. Most local civil society stakeholders discuss EU civil society engagement through the prism of national needs and issues, as well as through the perspective of bilateral relations of the EU with their country. This is particularly notable in countries with association agreements - Georgia, Moldova and Ukraine. In countries with restricted spaces for civil society, such as Belarus and Georgia, bilateral relations with the EU, and its potential impact on a more enabling environment take precedence over regional issues. In Belarus and Azerbaijan, regional co-operation provides an opportunity for civil society actors to share experiences, advocate and engage with their peers with more enabling environments for civil society. In this context, stronger links between EU and EaP CSOs including those built through EU-supported networks such as EaP CSF are of particular value as they facilitate dialogue with EU actors and other stakeholders. Across other countries of the region, regional programming is widely perceived as complementary to bilateral relations. Some civil society stakeholders in countries perceiving themselves as having a closer relationship with the EU like Georgia and Ukraine prefer a direct relationship with the EU and its institutions and do not see much added value in regional co-operation.

EU engagement with civil society is highly concentrated in clusters of CSOs ('NGOs') which address their mission mostly through securing foreign donor funding and have mostly not developed strong local memberships or constituencies. In contrast, there has been relatively little EU engagement with other sectors of civil society, such as community-based organisations, consumer groups, cooperatives, trade unions and professional organisations, non-profit actors representing the private sector. In this sense, engagement with civil society in the broad sense, corresponding to the EU's declared ambitions, remains a challenge for the EU and indeed for many of its grant beneficiaries. This analysis was confirmed by interviews, with civil society and public stakeholders across all countries of the region. This, in turn, reduces the outreach of EU engagement to formal and structured civil society organisations (progress in outreach to grass-root groups notwithstanding) and fosters the creation of donor-dependent organisations and networks.

Effects of the EU's engagement with civil society are severely influenced by external factors, notably activities of national authorities and changing geopolitical realities in the region. An unfavourable political environment is the single most limiting factor for the achievement of results across all forms and modalities of EU engagement with civil society across the region. Roadmaps in all countries note that national authorities play a key role in securing results in this area and have the power to slow down or even halt achievement of results. This is most pronounced in countries with shrinking spaces for civil society. The Roadmaps for Belarus and Azerbaijan (2014-2018) make good note of the influence of national policies and international influences on the results of EU engagement. Even in countries with AA/CEPA, lack of political will and changing political realities on the ground have limited the results of EU engagement, validating the importance of the intervention logic assumption about commitment and framework conditions being conducive to democratic development. In Azerbaijan, the national authorities have virtually halted the operation of independent CSOs and results achieved by the EU in its engagement with them, and the actions of the Ukrainian government in 2014 resulting in the Euromaidan revolution have seriously, albeit temporarily, threatened the achievement of results under all modalities of civil society engagement.

Over the course of the evaluation period, the EU expanded its engagement with civil society to a wider selection of civil society actors. This process has accelerated significantly after 2012, further to the 'Roots of democracy and sustainable development' document as well as with the rolling out of civil society roadmaps in the region in 2014. The positive tendencies and achievement of broadening of stakeholder outreach was confirmed by an overwhelming majority of interviewees in Armenia, Belarus and Ukraine. Stakeholders from the wider civil society spectrum, including media and social partners, confirmed that they are now considered part of the civil society landscape by local EUDs and can benefit from civil society engagement, and that they can participate in all three forms of engagement including specialised tools for human rights and democratisation, policy engagement involving non-CSO actors and mainstreaming for civil society stakeholders at large. Furthermore, in the AA/CEPA group of countries, the EU stimulated the development of bilateral platforms involving not only CSOs but also trade unions. In Georgia, the bilateral EU-Georgia civil society platform took a long time to be formed and operationalised, mostly due to the lack of experience in co-operation with trade unions on the part of both civil society organisations as well as Georgian government. In Moldova, stakeholders from all civil society groups reported similar problems. What is more, civil society stakeholders in all countries where bilateral platforms are operational note that the EU is more proactive in reaching out to social partners than national authorities, and that the inaction and reluctance of the latter group to co-operate is an obstacle to wider engagement with civil society actors in the region.

EQ4 (Impact): *To what extent have the EU's various forms of engagement with civil society in the Neighbourhood East contributed to the enhancement of participatory and inclusive democratic governance?*

Judgement Criterion 4.1	EU's engagement with civil society has contributed to the increased capacity of civil society organisations and actors to perform their roles as independent development actors in the Neighbourhood East
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The EU support had the potential to achieve impact, since increased capacities of CSOs are the most commonly reported cluster of long-term results across all forms of support, notably in targeted support. Across all countries of the region, civil society stakeholders as well as other stakeholder categories report achievement in increasing the capacity of civil society organisations to act as independent development actors. This is most pronounced with regards to targeted interventions. In the Armenia field mission, 10 out of 18 stakeholders across all categories (CSOs, public bodies, EU staff) stated that the EU's targeted support interventions had a significant impact on civil society's increased activity as independent development actors in the Eastern Partnership. The EU's engagement helped Armenian CSOs to advocate and lobby local, national and international stakeholders, thus strengthening their contribution to policy dialogue with different

stakeholder groups. Armenian stakeholders voiced some reservations regarding the impact of targeted support on grassroots actors, stating that, although EU targeted support has evolved towards more grassroots organisations and the wider civil society landscape, the long-term results tend to benefit mostly CSOs, larger organisations and those in capital cities and urban centres. On the other hand, several Armenian civil society stakeholders contended that EU engagement impacted the country's long-term political stability by contributing to peaceful change of power in 2018.

Stakeholders in Belarus stated that the EU's targeted support interventions had had an impact on civil society organisations actors performance as independent development actors in the country, with significant hindering factors noted due to the restricted government policy towards civil society. Most Belarusian survey respondents noted that the potential impact is in any case limited, in their view, as targeted support does not engage sufficiently with independent CSOs but has become increasingly directed at state-affiliated organisations, which do not have an incentive or goal to act as independent development actors.

In Ukraine, almost a third of stakeholders interviewed contend that the EU's targeted support interventions had had a significant impact on increased capacity of civil society organisations and actors to perform their roles as independent development actors in the Eastern Partnership, with reservations regarding the balance of capacity-development in geographical terms (Kyiv and large organisations benefitting most, those located in smaller cities less, and grassroots organisations in smaller and rural areas the least), and in terms of areas of capacity development. With regards to the latter, Ukrainian stakeholders underline that EU targeted support is most likely to develop advocacy capacities, and less likely to develop service provision capacities and policy engagement (see JC4.2).

Across all countries visited, stakeholders noted that all three forms of support suffer from similar limitations in long-term impact, notably through the project modality (as opposed to long-term programmes) and short-term programming.

Some CSO stakeholders in Ukraine pointed to the stabilising impact of EU engagement in times of political crisis, indicating that increased civil society capacity helped stabilise the country after the EuroMaidan revolution and contributed to containing internal and external threats to Ukraine.

Some CSO stakeholders in all countries of the region point out negative results of EU engagement, notably donor dependency, as both a hindrance to financial sustainability as well as an influence on programming priorities and constituency work of CSOs, oriented towards donor priorities rather than locally defined needs and issues (see EQ5).

Brussels-based EEAS and DG NEAR interviewees shared a common perception that EU engagement has had a significant impact in helping CSOs play their role as watchdogs/monitoring functions, allowing them to contribute to policy dialogue between different stakeholders.

The impact of EU engagement with civil society is stronger with countries with more conducive frameworks for democratic development. Both civil society and public institution stakeholders in countries with more open environments for civil society, and those where such environments have improved over the course of the evaluation, such as Armenia, Georgia and Ukraine, imply a causal relationship between EU engagement with civil society across all forms and modalities with the improvements noted. This is particularly notable for improvements in civil society capacities, and to a limited extent, conducive environments and policy engagement (see JC4.2 and 4.3). In countries with limited spaces for civil society, civil society stakeholders tend to hold more negative views about long-term results of EU engagement, regardless of evidence available. In Belarus, although sustainability of civil society organisations has improved modestly over the course of the evaluation period (see USAID CSO Sustainability Index, EQ5), stakeholders tend to be critical of long-term results of EU engagement across all forms of support.

Judgement Criterion 4.2

EU's engagement with civil society has contributed to the promotion of conducive environments for CSOs and broader civil society actors in the Neighbourhood East

The achievement of long-term results in promoting conducive environments heavily depends on external factors. The achievement of results is limited in countries with shrinking spaces for civil society such as Azerbaijan and Belarus. In some cases, external factors such as government restrictions on independent civil society severely reduce both short- and long-term results of EU engagement in promotion of conducive environments. Problems with external intervention (mostly government) are noted across all countries. Interviewees in all three field mission countries most frequently named the following: political factors (deterioration in democratic governance and political stability – Armenia, Belarus, Ukraine); military and geo-

political factors (war in Eastern Ukraine, tensions with Azerbaijan in Armenia); legislative and institutional factors (low capacity of public administration, slow pace of reform, all three countries); economic factors (economic crisis, all three field mission countries – Armenia, Belarus, Ukraine).

Stakeholders across all countries of the region reported that the EaP Civil Society Forum has contributed to capacity development of its members

Judgement Criterion 4.3	EU's engagement with civil society has contributed to the promotion of structured participation of CSOs and civil society actors in domestic policies, in EU programming cycles and internationally in the Neighbourhood East
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EU engagement with civil society across all three forms of support resulted in more structured participation of CSOs and civil society actors, notably in EU programming cycles. Stakeholders in all countries of the region confirm that the EU is largely successful in achieving results in terms of structured participation of CSOs and civil society actors in domestic policies, notably whenever the EU is involved as a stakeholder or observer. In Georgia, EU assisted with judicial system reform including involving CSOs in the process. In Ukraine, the EU supported the consolidation of a CSO coalition promoting reform across all sectors including anti-corruption, rule of law, governance and social policy, and actively lobbied for the inclusion of civil society in all areas of reform after the Euromaidan revolution. Furthermore, and as noted in EQ1-EQ3, the EU has expanded the scope of its co-operation with civil society beyond CSOs and supports involvement of media, social partners and other civil society actors in policy processes. Civil society stakeholders across the whole region have diverging views on the consultative processes for civil society in international organisations, and the EU is perceived to be one of the most active donors and international organisations when it comes to engagement of CSOs in policy cycles. When it comes to national level and domestic policies, stakeholders in Ukraine and Georgia indicated co-operation with local authorities and involvement of CSOs in local policy forums as the area in which most progress was made and long-term results have been achieved. This speaks directly to the reconstructed intervention logic outcome of strengthening democracy and convergence of political views, as involvement of different stakeholders in structured consultations is increasingly the norm in the region thanks to the EU's engagement with civil society.

The achievement of long-term results with regards to promotion of structured participation of CSOs and civil society actors in domestic policies is severely restricted by external factors. National authorities in all Eastern Partnership countries are less open towards CSO engagement in policy processes than most EU programmes and modalities. Absence of EU engagement in the field, according to civil society stakeholders in the region, would result in the decrease of structured participation of CSOs in domestic policies, threatening sustainability of EU engagement (see EQ5). Countries with a more formal relationship with the EU and an active bilateral agreement are more likely to include CSOs in structured participation both in domestic policies and in bilateral relations. Countries with restricted spaces for civil society are much less likely to include CSOs in structured dialogue on domestic policy and, in rare instances, where this happens, they tend to hand-pick organisations that are either in agreement with or controlled by the government. Civil society stakeholders from Azerbaijan noted that the EUD in Baku does not routinely distinguish between independent and government-controlled CSOs, inviting these to the same discussions. Many non-governments linked CSOs stated that this restricted their ability to speak candidly.

EQ5 (Sustainability and Ownership): *To what extent have the changes to which EU support have contributed proved to be sustainable after the end of EU funding?*

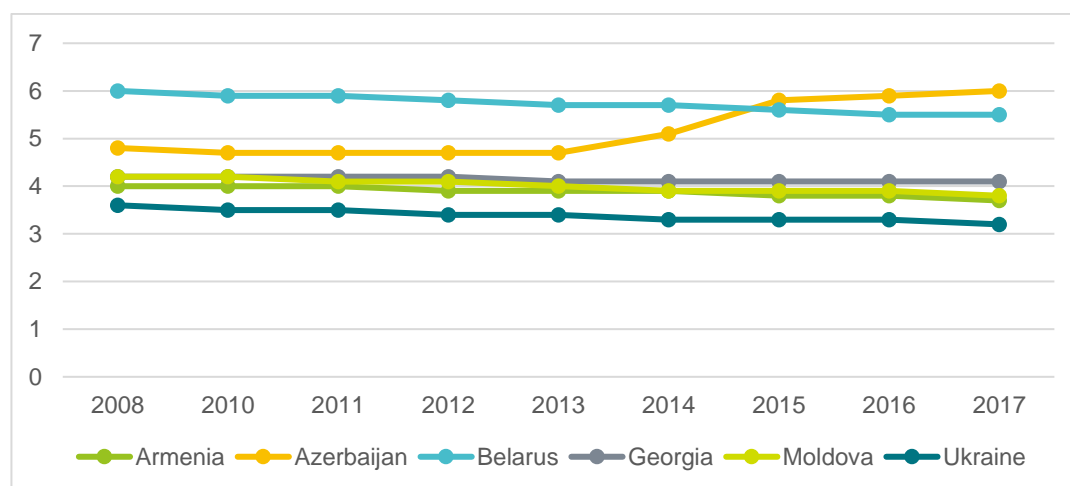
Judgement Criterion 5.1	The results achieved through the EU's support and engagement with civil society allow the beneficiary organisations and actors to continue to operate as effective actors in the civic and governance realms
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The evaluation produced only partial findings relating to this JC. Relatively few sources were identified to assess the actual rather than potential sustainability of CSO capacity. Government capacity to interact with CSOs was hardly examined. There is a correlation between EU support (as the largest donor, and with a clear focus on CSO capacity, enabling environment and engagement in domestic policy cycles) and improvements in CSO capacity and (in some countries) in the enabling environment and willingness of other actors to engage with CSOs. Unfortunately, the evaluation did not generate findings that could establish the extent to which EU support contributed to the RIL impacts.

Civil society stakeholders across all countries of the region report sustainability of results with regards to CSO organisational capacity, including in the development of strategic planning capacities, staffing, and technical capacities.

External indexes such as the USAID/CIVICUSCSO Sustainability index suggest that sustainability of CSOs has grown steadily throughout the evaluation period, with notable improvements in five countries, except Azerbaijan. These trends are illustrated in the following chart.

Figure 3 USAID CSO Sustainability Index for Eastern Partnership countries, 2008-2017



Sustainability enhanced		Sustainability evolving		Sustainability impeded	
1.0-2.0	2.1-3.0	3.1-4	4.1-5	5.1-6	6.1-7

Source: USAID Sustainability Index report, 2008-2017

In countries with consistently improving environments for civil society organisations and other actors, such as Georgia and Ukraine, results in this sphere can be deemed sustainable, but the links between EU engagement and enhanced environments are difficult to attribute and measure. External factors including policy of national governments and activities of international actors can quickly undo results achieved with EU engagement. Azerbaijan is a case in point, as despite high levels of EU engagement before 2014, the government of Azerbaijan's subsequent crackdown on independent civil society organisations and individual actors resulted in a sharp and sustained deterioration of civil society environment. In Belarus, although there has been some improvement in the situation of civil society organisations and actors over the course of the evaluation period, periods of improvement are often followed by periods of sharp deterioration, sometimes in different areas (e.g. organisational environment vs. personal freedoms) and local civil society stakeholders contend there is no sustainability in any results achieved in this sphere.

Results in engaging civil society in policy cycles at national and international level are highly dependent on national governments. As reported under EQ4, national governments across the region have different views on the role of CSOs in policy-making and their interest in its pursuit is linked to the relationship with the EU and the dynamics of bilateral relations. In countries with a closer relationship with the EU (AA/CEPA), national governments are more likely to sustain involvement of CSOs in policy cycles beyond EU interventions. Furthermore, any involvement of CSOs at the international level can be severely restricted by national authorities through instruments travel restrictions, intimidation and harassment. In both Azerbaijan and Belarus, EU-supported meetings where civil society could discuss policy issues were largely limited to EU premises, meetings outside the country, and electronic communications.

Judgement Criterion 5.2	The design and implementation of EU interventions and activities have facilitated sustainability
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The EU's increasingly long-term and strategic engagement with civil society moving away from project approaches to long-term and strategic agreements facilitates long-term sustainability. The project approach to civil society engagement in EaP dominated in early years of the evaluation period, notably pre-2012. It was not particularly conducive to ensuring institutionalisation of CSOs, particularly as institutional grants were not available in the majority of cases. The introduction and increased used of strategic tools such

as networks, platforms and re-granting schemes reaching out to grassroots organisations after 2012 helped to achieve greater overall sustainability. Civil society stakeholders in countries with strong national and bilateral platforms under EaP CSF and AA/CEPA - Armenia, Georgia, Moldova and Ukraine – note that the EU's move to long-term support for those platforms and long-term interventions such as multi-annual technical assistance projects has resulted in greater sustainability of civil society organisations. In countries with restricted spaces for civil society (Azerbaijan and Belarus), even though sustainability is limited, long-term and network approaches contributed to increased sustainability.

Financial sustainability of CSOs remains low across the entire region and all modalities and forms of support. Civil society beneficiaries across all six countries of the region note that financial sustainability is often the weakest element in overall sustainability building. Many CSO stakeholders note the absence of core funding as an impediment to long-term financial sustainability of CSOs. The EU is aware of the issue and does try to alleviate the situation through other measures including coalition-building and networking projects and programmes. Many such initiatives stimulate the creation of local CSO coalitions, as funding is only available to groups of organisations, or restrict funding to organisations that had not previously benefitted from EU support. What is more, the EU's use of core funding is restricted by financial regulations, requiring that the EU has oversight over how funds are spent and approves expenses prior to them being incurred. This is not possible with some forms of core funding where funds are spent on general activity areas rather than specific actions, and planning is ongoing.

Comprehensive phasing out measures are rare across all forms and modalities of EU engagement with civil society. None of the major instruments, including ENI, EIDHR and NSA-LA include comprehensive sustainability and EU exit/phasing out strategies, and very few projects contain detailed plans for activities ensuring sustainability of results.

Strategic approaches to sustainability through stakeholder coalition building is rare and inconsistent between modalities and forms of engagement. In targeted engagement, project and programme-level documentation reflects a lack of a coherent and comprehensive approach to sustainability at the programme, country or regional level. In mainstreaming interventions, although many actions contribute to deeper relationships between CSOs and other partner country and regional stakeholders, the evaluation did not identify significant evidence pointing to strategic approaches to sustainability by the relevant EU services and partner country stakeholders. (See also EQ4). In policy engagement there is more evidence of strategic coalition building for sustainability, as the EU encourages national governments and local authorities to sustain results by continued involvement of civil society in policy cycles (see also EQ4).

EQ6 (Coordination, complementarity and coherence): *To what extent have the various forms of EU engagement (including policy dialogue and financial support) with civil society in the Neighbourhood East been effectively coordinated, complementary, and coherent with the activities of EU MS and other donors?*

**Judgement
Criterion 6.1**

Links between policy work, multi-stakeholder dialogues (e.g. fora) and financial support were effectively established and coordinated in the Neighbourhood East.

There is a good level of horizontal coordination at strategic, instrument and regional level between relevant Brussels-based EU institutions working with civil society. There is ample evidence of coordination at top institutional levels among Brussels-based line institutions dealing with civil society matters in EaP. This is particularly visible in strategic policy frameworks, where global policy goals are complemented by thematic and regional ones. There are visible attempts to maximise coherence and minimise overlaps e.g. between the EU's global strategy, neighbourhood strategy (including EaP) and human rights strategy. Multi-stakeholder dialogues involving key institutions including DG NEAR, DG DEVCO and the EEAS are regular and key Brussels-based stakeholders liaise over strategic and policy matters on both a regular and ad hoc/needs basis. Furthermore, there are good levels of coordination in designing instruments and modalities, as global instruments such as ENI are complemented by thematic instruments such as EIDHR and NSA-LA and other forms of support such as EED²⁶.

There is limited horizontal co-ordination between the various EU services that deal with civil society on a less regular and lower priority basis. EU staff interviewed for this evaluation suggested that EU institutions with specialised thematic portfolios, such as DG Trade or DG AGRI, which have their own policies

²⁶ Even though EED is not an EU institution, the EU was instrumental in its creation and remains one of its key supporters. Moreover, there is a wide perception among civil society stakeholders in EaP that it is part of the 'European' family of programmes together with the EU modalities available.

and agendas in their own sectors (e.g. trade or agriculture) tend not to engage EUD sections dealing with civil society on a regular basis and only do this on an ad hoc basis when co-operation is required for operational reasons. This is particularly notable in countries with more close relations with the EU and an AA/CEPA. For example, although the EU 'development co-operation' programme in Georgia is involved in a wider and complex co-operation and political framework, evaluation findings suggest that it has not been coordinated between the relevant sectoral institutions. Although many EU trade issues have important civil society considerations in Georgia (as they do elsewhere), there is less expertise on the former at the local EUD and no regular co-ordination between DG Trade and EUD units dealing with civil society matters.

There is only limited co-ordination between Brussels-based EU services and those in the field, as well as between the EU and Member States, regarding the EaP. Coordination between EU DGs and EUDs with civil society as well as institutions based in Member States (CBC programme secretariats) is reported by most interviewees to be difficult, with many reporting that regular co-operation does not occur, particularly at implementation and monitoring level. There are few active or regular coordination attempts between DGs, EUDs and CBC secretariats in programming matters. For example, in Belarus, the EUD did not have a purview over an EIDHR project implemented via an Armenian beneficiary in co-operation with Belarusian stakeholders. None of the EUDs visited in Armenia, Belarus, Georgia and Ukraine were aware of the civil society component under ENI CBC or EaPTC (Territorial Co-operation) programme. This is particularly important in the case of CBC programmes with significant CSO participation like the CBC Black Sea Basin where over 50% of beneficiaries are civil society organisations.

There is limited coordination between different sections at EUD level. This is particularly acute in larger EUDs. At the Ukraine EUD, as many as seven sections/desks handle civil society-relevant programmes, but EU staff interviewed report that these do not coordinate or communicate with each other on a regular basis. CSO stakeholders also expressed their perception that EU staff in different sections are not well informed about CSO initiatives managed by colleagues in other sections of the EUD. The institution of CSO focal points is useful in coordinating the main policy and strategic levels of EU engagement vertically between Brussels-based institutions and EUDs, as well as in coordinating key modalities of support for civil society, but these are generally junior staff, and do not have coordinating authority within the EUDs themselves.

**Judgement
Criterion 6.2**

The combined efforts of the EU and EU Member States and other donors have led to a coherent and complementary response to the needs of civil society.

The EU is the largest donor in all countries of the region and regularly attends all relevant coordination meetings in all Eastern Partnership countries. In Ukraine, the EU co-chairs the civil society donor group with the US Government, and in Belarus, it regularly attends the Belarus International Implementers Meeting (BIIM). In Armenia and Georgia, the EU liaises regularly with USAID over priorities and programming. This is confirmed by strategic and programming documents, notably civil society engagement roadmaps, often prepared with EU MS and other donor inputs. At implementation stage, project documents reviewed show that attempts at coordination are made but they differ greatly between programmes and projects.

**Judgement
Criterion 6.3**

Synergies were achieved and duplication of efforts of the EU, EU MS and other donors was avoided in the Neighbourhood East

The evaluation process did not reveal any evidence of significantly divergent views and positions between EU, EU MS and other donors on issues regarding civil society and its inclusion in governance processes in Eastern Partnership.

Political support to civil society is a shared priority among all key Western donors, together with advocacy on the need to empower and engage civil society in governance and policy making processes.

EQ 7 (EU-added value): *To what extent have the various forms of EU's engagement with civil society in the Neighbourhood East over the evaluation period had characteristics which distinguished it from that of other actors?*

Judgement Criterion 7.1	EU support to civil society in the Neighbourhood East has had a distinctive feature in comparison with that provided by other actors, based on its comprehensive and multi-faceted approach
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The size and scope of EU support is the first and foremost distinguishing factor in EU engagement with civil society. The EU is the region's largest donor for civil society, with which it has engaged through a combination of forms of engagement, including targeted, mainstreamed and policy support, integration of civil society into processes of sector budget support (at the level of indicators and/or complementary measures), as well as the establishment of stand-alone technical assistance facilities managed by and/or for CSOs. No other donor in the region has taken such a comprehensive approach to civil society engagement.

On some themes of EU cooperation with the countries covered by this evaluation, there is a very clear complementarity between different modalities of EU support. For example, on themes relating to child labour, and trafficking, most EU support to partner countries is delivered via technical assistance and budget support that address prevention issues such as keeping girls in school, social protection, and promoting decent employment for adults. CSOs play an essential and complementary role in awareness raising, community-level interventions, pilot projects that can test methodologies and approaches, and in facilitating broader debate on these issues. One 2016 study reported that "EU operational engagement to reduce trafficking, child prostitution [...], and the involvement of children in illicit activities is delivered through a relatively large number of [CSO] projects, representing only a small share of EU funds allocated to child labour themes."²⁷ According to the same study, CSO projects tend to focus on capacity of civil society and sub-national authorities, and support to victims, "while projects implemented by international organisations, partner country counterparts and TA arrangements tend to focus on [prevention, as well as] the overall legislative and regulatory framework, and on capacity of national level institutions."²⁸

All actors across all countries of the region report that the size of EU financial support and scope of support covering different forms and modalities are the most visible and noticeable distinguishing factors of EU engagement with civil society. In Armenia, both previous evaluations and local stakeholders note that the EU was the single most important partner for civil society organisations, albeit closely followed by the USA at least until the recent downsizing of its aid portfolio in South Caucasus. In Belarus, both previous evaluations and local civil society note that the EU is not only the single most important partner for civil society in everyday engagement, but in the near-absence of US diplomatic presence in the country, the single most important partner in leveraging support to civil society matters through and with international actors. In Georgia, evaluation results note that the EU was the most active supporter of civil society throughout the entire evaluation period, notably in providing financial support, but the USA remains as important as a political partner for the country and its civil society. In Ukraine, especially since the 2014 Euromaidan revolution, the EU became increasingly more visible locally both in engagement with civil society and in wider political dialogue with authorities in matters pertinent to civil society such as rule of law and anti-corruption work.

The three forms of engagement with civil society distinguish the EU from other donors. Civil society stakeholders in all countries of the region are united in their agreement that the EU's engagement architecture is a distinctive feature. Although other donors, notably the USA, use targeted support, policy engagement and mainstreaming formats, they do so to a much smaller extent than the EU. Furthermore, in AA signatory countries, where governments have repeatedly voiced their aspirations to pursue closer relations with the EU, its engagement with civil society is perceived as a very important feature of overall bilateral relations.

Capacity development, and the enabling environment, are to some extent 'infrastructure' or 'backbone' support, which creates favourable preconditions for success of civil society initiatives and other stakeholders' support to civil society.

The EU is the only development actor to combine and complement bilateral and regional activities to a significant extent. Further to the creation of EaP, the EU engages with civil society actors not only on the ground in EaP countries but also through bilateral platforms in the region and in Brussels and through regional

²⁷ SACO (2016) "Tackling Child and Forced Labour: assessment of projects, orientations for future actions and identification options," specific contract 2015/368963, pp.63-64.

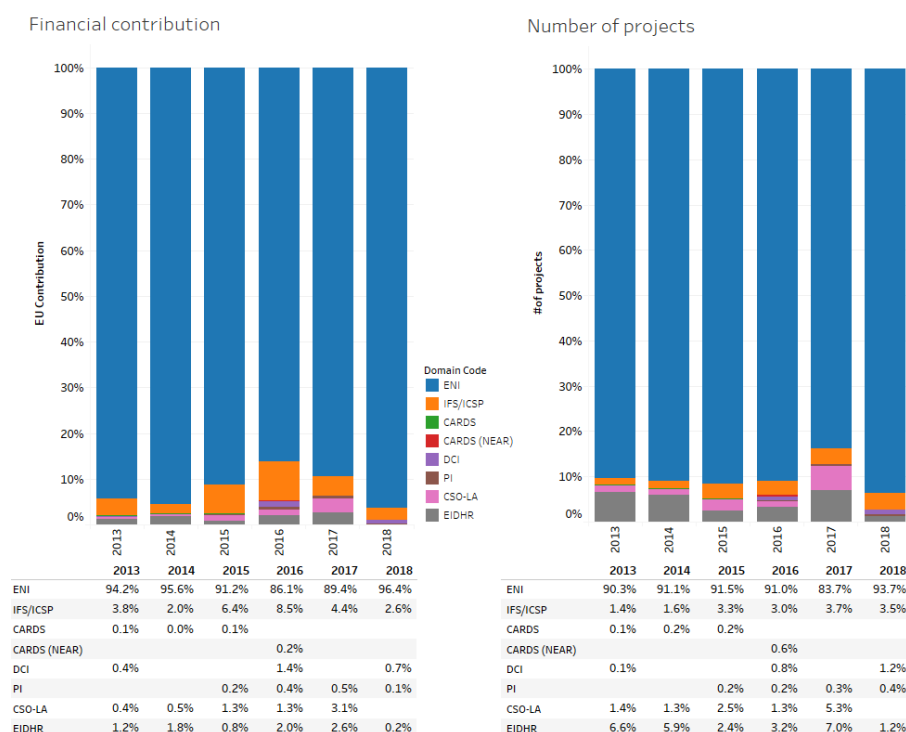
²⁸ SACO (2016) "Tackling Child and Forced Labour: assessment of projects, orientations for future actions and identification options," specific contract 2015/368963, p.63.

platforms and forums such as the EaP CSF. The EU is the only donor to actively pursue regional co-operation in all programming areas, including civil society. This is particularly relevant to countries with closer relations with the EU (AA/CEPA – Armenia, Georgia, Moldova and Ukraine).

The combination of thematic and regional instruments is a significant feature of EU support. The regional ENI and its predecessors provide more than 90% of financial support and are responsible for more than 80% of relevant actions. The thematic programmes EIDHR and CSO-LA represent less than 10% of relevant actions and less than 10% of funding.

The following chart shows the contribution to relevant actions of the various sources of EU funding, in financial terms and as a proportion of relevant actions.

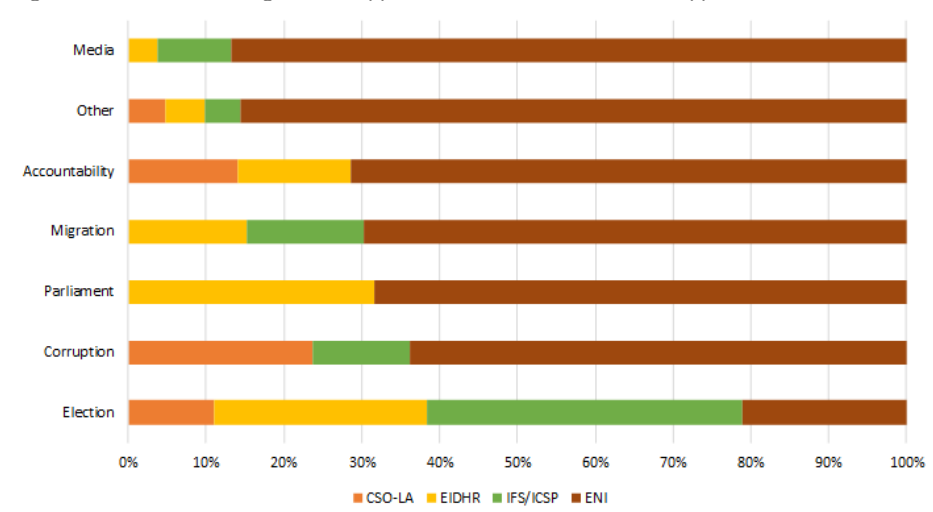
Figure 4 Sources of funding for EU support to civil society in the EaP countries



Source: Landell Mills' analysis of all contracts for external action in the countries concerned during the period 2013-2018, which the evaluation team classified as targeted or mainstreamed support to civil society.

Although the thematic programmes represent only a small proportion of EU support to civil society, they have a distinctive focus. This is illustrated in the following chart, which analyses the contribution of each source of funding to selected themes on which CSOs work. As can be seen in Figure 5, the thematic programmes, particularly CSO-LA and EIDHR, provide a significant proportion of support to themes of accountability, electoral cycle, migration, parliament and corruption, despite their low share of the overall EU financial support to CSOs.

Figure 5 Sources of funding for EU support to selected themes of EU support to CSOs in the EaP



Source: Landell Mills' analysis of all contracts for external action in the countries concerned during the period 2013-2018, which the evaluation team classified as targeted or mainstreamed support to civil society, and which the evaluation team classified as addressing the selected themes.

In addition to the above-mentioned distinctive thematic focus, the EIDHR also has enhanced flexibility compared to other EU funding arrangements. Support can be provided, in justified conditions, to unregistered or informal civil society entities, and the average grant size tends to be lower.

Regarding sector budget support, most interview respondents stated that complementary measures have provided useful, though limited and ad hoc support to CSO engagement on transparency, accountability and good governance themes. A recent study identified Moldova as “one of the countries where issues of democratic accountability and civil society engagement have been most systematically addressed in budget support across several sectors of EU bilateral cooperation.”²⁹

EQ 8 (EU-added value): *To what extent could changes, which the EU contributed to, have happened in its absence?*

Judgement
Criterion 8.1

EU support has been an essential factor in contributing to significant change in the sphere of civil society development in the Neighbourhood East

EU support has been an essential factor in contributing to significant change in the sphere of civil society development in the Eastern Partnership region. The EU was instrumental in promoting positive change for civil society in areas such as capacity-building, policy engagement and developing a more enabling environment for civil society in the EaP region. Respondents across all countries and groups are united in agreement that absence of EU support in the Eastern Partnership in 2007-2018 would have had a severely detrimental impact on the sector and on the countries’ development in general.

4. Russia

Responses to EQs have been provided by indicator, in Annex 3, Section 4.

²⁹ DEVCO Supporting Democracy Facility (2017) “Draft Compendium of success stories in EU support to democratic accountability.”

Annex 3: Evaluation matrix

1. Enlargement region

EQ1 (Relevance): To what extent have the EU's objectives and approaches to its engagement (policy dialogue and financial support) with Civil Society properly addressed the variety of problems faced by / needs of Civil Society actors in the Enlargement region over the evaluation period

Judgement Criterion 1.1: The EU's objectives with regard to its support to civil society have evolved effectively in line with the needs of civil society actors over this period in the Enlargement region.

Evidence collected through document review and stakeholder interviews (with EUDs across the Enlargement candidates and potential candidates, CSOs, government and other development partners) confirms that EU's objectives with regards to its support to civil society in the Enlargement region have evolved effectively in line with the needs of civil society actors over the evaluation period. The EU Support to civil society has evolved also in line with updated EU integration priorities as per countries' progress within the EU accession process.

Over the period between 2007 and 2018, EU notably altered its approach in relation to civil society, which is visible from the assessment of IPA I and IPA II approaches. During the IPA I period, civil society was not defined as a special sector. IPA Multi-indicative strategy papers (MIPD) only stressed the notion for better dialog and monitoring of the effectiveness of government policies and programmes as well as mainstream civil society issues. Although since 2008, a steady turn towards the sectorial approach has been made, only in 2014 civil society became systematically included (e.g. Indicative Country Strategy Papers for each of the Enlargement candidates and potential candidates). Since IPA II, there is an overall framework for support to civil society presented in **The Guidelines for EU Support to Civil Society in Enlargement Countries (2014-2020)** which laid a foundation for EU engagement with civil society. It promoted civil society involvement in identification, planning implementation and monitoring of IPA II support across all sectors and envisaged both political and financial support for CS in the enlargement candidates and potential candidates. The Guidelines present the main vision and priorities, which have been elaborated and adapted to country contexts and changing needs. For instance, review of EU support to Turkey confirms the evolution of EU assistance to respond to changing landscape and operational environment for civil society, whereby consultations contributed to better alignment of EU assistance.

Throughout the period between 2007 – 2018, European Union invested efforts to continuously update civil society about its support, through consultations and information sessions. Consultations were organised to provide inputs to EU progress (now Country) reports; through sector working groups for programming of assistance; or towards obtaining CSO inputs to the negotiation process through pre-consultations with civil society ahead of Special Group meetings. Evaluation found that the EU strategic documents are drafted integrating inputs resulting from civil society consultations. Such events also evolved during the reference period of evaluation, from ad-hoc and rather erratic events to systematic events following the launch of Calls for Proposals (CfPs) or during consultations for drafting Guidelines to civil society for various Calls (e.g., CSF systematically organises consultations and info sessions during programming and CSF processes). Available ROM reports confirm the value of consultations with civil society in developing and implementing civil society sector support interventions, with positive ratings of the relevance criterion. However, this evaluation found certain weaknesses in the knowledge management processes of EUDs, which do not keep consistent documentary records on such consultations.

Evaluation finds that EU was particularly successful in showing linkages between contextual analysis in a given country and the choice of objectives. However, evolution of EU's support in terms of a sectoral mainstreaming of civil society was less visible.

Indicator 1.1a	Stakeholders confirm the relevance of EU objectives relating to its engagement with civil society over the period under evaluation
<p>There is evidence, particularly at the level of projects (e.g. final project reports and ROMs, feedback received in stakeholder interviews with implementing partners and EU), that specific project interventions have been relevant to the needs and priorities with regards to civil society empowerment. For instance, available project ROMs (even though only a small number of sampled projects had ROM missions) in general offer a rather positive assessment of relevance of interventions, with A ratings. At the more strategic level, available evaluations of EU assistance³⁰ found that EU objectives relating to engagement with civil society have been relevant and aligned with the underlying EU integration agenda and Copenhagen Criteria for Accession. Concretely, the Mid-term Evaluation of CSF notes that “the CSF has been a relevant instrument to respond to the engagement of civil society in response to the enlargement requirements of IPA countries. The CSF is also a relevant mechanism to support strategic guidance towards establishing a structured dialogue between CSOs, governments, operating structures and the EU (DG NEAR and EU Delegations).”³¹</p> <p>Document review and stakeholder interviews highlight two main features of relevance of EU objectives relating to its engagement with civil society across the board of enlargement candidates and potential candidates:</p> <ol style="list-style-type: none"> 1) Relevance to the needs and priorities of civil society. <p>EU has primarily engaged with civil society, tackling their needs for organisational development and professionalisation in specific areas of their work (advocacy, engagement in policymaking processes; representation and work with their constituencies, etc.). There has been an evolution of support to other civil society actors, particularly with IPA II.</p> 2) Relevance to the priorities of EU accession and overall improvement of governance, in line with EU strategic documents and increasingly so of the national governments’ strategies. <p>EU has based its civil society support on EU enlargement priorities, particularly within the pillar of democracy and human rights. Across all enlargement candidates and potential candidates, support to civil society has been an integral part of a larger investment in democratisation and good governance. In the Western Balkans, support to civil society has followed a fairly linear path of support to transition of states to democracy with increasing efforts towards good governance; and in Turkey this support has been increasingly relevant, particularly since the attempted coup in 2016, when civil society’s position has been significantly challenged and the need has arisen for new modes and mechanisms of support. To respond to the increasingly difficult context for civil society, the EU has adapted its “management mode for actions in the field of civil society development by ensuring that the bulk of assistance is directly managed by the Commission inter alia via the Civil Society Facility and not via the Ministry of EU Affairs, as was the case previously (indirect management)”.³²</p> 	
Indicator 1.1b	The rationale for the evolution of EU objectives is presented in key policy and programmatic documentation
<p>Based on the lessons learned of previous enlargement rounds, the European Commission defined the “<i>strong, deep and sustained dialogue between the societies of the candidate countries and in the EU member States, as well as with the EU institutions</i>” as one of the most important tools “to bridge the information gap, achieve better mutual knowledge and bring citizens and different cultures, political and economic systems closer together, thus ensuring a stronger awareness of the opportunities as</p>	

³⁰ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey and European Commission (2011); European Commission (2012); Thematic Evaluation of EU's Support to Civil Society in the Western Balkans (namely, Albania, Bosnia and Herzegovina, Croatia, the Republic of North Macedonia, Kosovo under UNSCR 1244, Montenegro and Serbia) and Turkey 2012 (link: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/financial_assistance/phare/evaluation/2012_eval_cs_final_report_2.pdf)

³¹ Ibid, p. 6

³² European Commission (2014 and revised in 2018); Revised Indicative Strategy Paper for Turkey (2014-2020); ADOPTED ON 10/08/2018, p. 23

*well as the challenges of future accessions*³³. The rationale for the evolution of EU objectives is increasingly well presented in key policy and programmatic documentation, particularly from the point of showing linkages between contextual analyses and choice of objectives. There is a visible evolution in the way in which EU objectives relate or integrate civil society in the period between 2007 - 2018, particularly in terms of overcoming fragmentation of support and shifting the focus increasingly to the grassroots level, as discussed in detail below.

IPA I (2007-2013)

EU support to the Enlargement region during the reference period of this evaluation may be divided into two phases, coinciding with the sequence of EU pre-accession assistance, i.e. IPA I (2007-2013) and IPA II (2014-2020). The main priority areas of overall IPA assistance stemming from EU enlargement priorities, delineated at strategy (Accession Partnership, Enlargement Strategy Papers, benchmarks) and programming (MIPDs) levels³⁴ reflect the Western Balkans' and Turkey's political, economic and institutional context and needs of the beneficiaries. When it comes to specific support to civil society, upon establishment of the Civil Society Facility (CSF) in 2008, EU support was channelled through IPA I interventions and through EIDHR as a complementary instrument. Since CSF was established, it was the instrument within which most civil society support was directed, whereby EU support was also channelled through EIDHR, and through various IPA components (e.g. Cross-border programmes; mainstreamed within sectoral support, etc.).

EU engagement with civil society in the Enlargement region focused on strengthening civil society as important actors in governance processes in each enlargement country. There is a clear evolution of the way in which civil society has been approached across the reference period of the evaluation. Within the IPA I period, until 2013, the EU did not put in place a specific civil society sector strategy. The EU policy framework for assistance was organised through the IPA Multi-indicative strategy papers (MIPD), defining areas of EU support to various sectors of importance. A review of MIPDs for the period of 2007-2013 shows that MIPDs do not define civil society as a separate sector but mention the need to promote dialogue and monitor the effectiveness of government policies and programmes as well as mainstream civil society issues as a priority for financial support. Based on this overall framework, civil society support has been programmed and implemented within both CSF and also using other instruments and forms of assistance.

Establishment of a separate Facility by the EU that focuses on civil society and also on the enabling environment for civil society as far back as 2008 showed a step forward in ensuring that the sector is given prominence³⁵. This was an important step for civil society from two angles; 1) as an empowerment tool, making it clear that civil society's role and position is important in light of EU accession process; 2) a financial tool, ensuring that civil society actions could be financed and supported. Interviewed stakeholders consider this as an important measure that increased relevance of EU support, through establishment a dedicated fund for civil society actions and interventions.

Another step forward in the evolution of the EU's engagement with civil society was the increasing shift towards a sectoral approach by the EU, that happened already in the later years of IPA I implementation, and was fully geared with IPA two. The gradual shift towards a sectoral approach was seen as an important tool in ensuring the relevance and effectiveness of EU assistance in different sectors³⁶, hence support was increasingly grouped into sectoral interventions (e.g. environment, PAR, social development, etc.) across the Enlargement region. The 2013 Meta Evaluation of EU IPA assistance noted that the impact of the IPA had towards “**substantial progress made towards sectoral policy objectives**”³⁷. This shift was important for civil society from two aspects: 1) to be able to engage in the programming of sectoral support and 2) to be able to professionalise in the sector of their work to be able to provide inputs that are more prominent. The first item was recognised as an important factor

³³ European Commission (2012); Final report of the project Strengthening Serbia-EU Civil Society Dialogue project, p. 7

³⁴ The policy documents for setting down the priorities for programming of assistance under IPA are the Accession Partnership, the Enlargement Strategy Paper presenting the Commission's overall enlargement policy, as well as the annual Progress Reports. The Multi-annual Indicative Planning Document (MIPD) is the programming document for IPA: it is established for a three-year rolling period, with annual reviews.

³⁵ See also evaluations conducted on EU support to civils society in 2012 and 2017.

³⁶ See Interim Evaluations of EU IPA assistance for individual enlargement countries as well as Meta Evaluation of EU IPA Component I IPA assistance on https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/financial_assistance/phare/evaluation/2013/ipa_interim_meta_evaluation_report.pdf

³⁷ European Commission (2013); Meta evaluation of Component I IPA assistance, p. 52

in the Meta Evaluation of EU IPA assistance, which noted “*planning and programming of Civil Society support allows for the integration of Civil Society needs across sectors*”³⁸. However, the evaluation found that “*optimal participation of all relevant Civil Society organisations was needed to ensure programming systematically includes CS perspective*”³⁹.

However, stakeholder interviewed for the purpose of the evaluation do not see the materialisation of mainstreaming of civil society within the sector support. Attempts to create CSO sector networks have had varying success across enlargement candidates and potential candidates (more in Serbia, as sector networks are still active in different forms, while in Bosnia and Herzegovina they have not managed to sustain in operational terms).

IPA II (2014-2020)

EU engagement with each enlargement country was structured in a more systematic way within the IPA II, whereby an Indicative Country Strategy Paper for the period 2014-2020 was prepared for each country individually, replacing the cumbersome process of developing and adopting MIPDs which were prepared on a rolling basis throughout the IPA I period. The Indicative Country strategy papers presented the EU engagement with the country in a structured manner, basing support on recognised challenges and also country strategies and policies in the relevant field. The sectoral orientation is very much visible in these documents, showing a clear pathway of support to a country in its path to EU accession. Review of these documents across the seven enlargement candidates and potential candidates /territory shows that civil society is included systematically, mostly within the Democracy and Governance pillar or as sub-sector, such as in the case of Turkey⁴⁰.

A major foundation was laid for EU engagement with civil society by adoption of **The Guidelines for EU Support to Civil Society in Enlargement Countries (2014-2020)**⁴¹ as a **key framework for DG NEAR and EUDs in the formulation of directions and plans. The Mid Term Evaluation of CSF (2017) noted that** the “*Guidelines provide a comprehensive frame and drive the programming of CSF assistance*”⁴². In line with the Guidelines for EU Support to Civil Society in Enlargement Countries 2014- 2020, IPA support aims to promote the creation of a conducive environment for civil society development, as well as to strengthen the capacities of civil society organisations to engage in structured dialogue with the public institutions⁴³. As explained throughout the Guidelines, civil society involvement is promoted in the identification, planning, implementation and monitoring of IPA II support across all sectors. EU support to civil society in enlargement candidates and potential candidates for the period of 2014-2020 envisages a “*combination of political and financial support to meet these priorities, employing a more strategic, effective and results-focused approach to deliver maximum impact with the limited human and financial resources available*”⁴⁴. The guidelines envisage different forms of support, both political and financial. Within its **political support**, the Commission envisages supporting enlargement candidates and potential candidates to adopt a more enabling legislation for civil society on the one side and, on the other side, promotion of CSOs involvement in the pre-accession process, specifically in the formulation, implementation and monitoring of sector strategies to be supported through the EU financial assistance that will be stronger under IPA II. With **EU financial assistance**, a combination of its financing instruments to respond to the CSOs types, needs and contexts in a flexible, transparent, cost-effective and result-based manner was envisaged, keeping due consideration of the Commission’s administrative burden. According to the guidelines and their operationalisation through EUD approaches, this entails long-term contracts, given that capacity building and advocacy require time and resources; this approach departs from project-based support in favour of a more flexible approach that encourages partnerships and coalitions and supports new organisations through small grants and other mechanisms that respond to their immediate needs⁴⁵. The guidelines were further elaborated in the form of a Monitoring framework, which was supposed to allow for detailed monitoring of progress towards fulfilment of principles.

³⁸ European Commission (2013); Meta evaluation of Component I IPA assistance, p. 52

³⁹ Ibid, p. 52

⁴⁰ See Indicative Country Strategy Papers for Serbia, Bosnia and Herzegovina, Kosovo*, Albania, Turkey, Montenegro and the Republic of North Macedonia.

⁴¹ European Commission (2014); Guidelines for EU support to civil society in enlargement countries, 2014-2020, DG Enlargement

⁴² European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans, p. 25

⁴³ European Commission (2014); Guidelines for EU support to civil society in enlargement countries, 2014-2020, DG Enlargement

⁴⁴ Ibid, p. 3

⁴⁵ See Guidelines and also EU country specific website descriptions of EU support to individual countries

At the level of projects, subsequent evaluations conducted on the subject of EU IPA assistance overall and concretely focusing on civil society note the evolution of support, with the caveat that sectoral mainstreaming of civil society is less pronounced, as also confirmed in stakeholder interviews. For example, the Mid-term evaluation of CSF found *“there are a number of systems and processes in place that ensure links between the objectives of the EU’s support to civil society and civil society itself, including ensuring the needs of civil society, and its priorities are visible in the content and structure of calls for proposals”*⁴⁶. On the other side, the Meta Evaluation of EU IPA assistance noted *“the introduction of a more sector based approach in the next financial perspective [IPA II] offers the potential for better involvement of organisations as it will build on the sector working groups to take a more strategic approach to programming.”*⁴⁷ Efforts have been invested by EUDs and DG NEAR to conduct consultations with funded organisations, which was also noted in relevant evaluations of EU assistance (Evaluation of EU support to civil society and Interim Evaluations of EU IPA assistance). There has been an *“intentional move away from EU-driven content of calls for proposals, with the focus on the ways that CSOs are able to define objectives themselves, within a framework that gives indications on what types of actions will be supported. There has also been a move away from short-term action grants in recent years, with a related increase on longer project timeframes. This change has been particularly effective in increasing the outcomes from funded initiatives.”*⁴⁸ Stakeholders interviewed within the framework of this evaluation confirm the increased relevance of EU support as a result of consultations, as CSOs have space to voice their needs, priorities and thematic fields to be addressed.

Indicator 1.1c

Consultations with civil society actors and organisations were used to inform the evolution of EU objectives

Consultations with civil society do inform the evolution of the EU’s objectives, though EUDs do not keep systematic documentary records on such consultations, as confirmed by EUD representatives and CSO representatives. Consultations with civil society happen across the board in EU policy and programming processes with enlargement candidates and potential candidates in various forms such as: inputs to EU progress (now called Country) reports; participation of civil society in sector working groups for programming of assistance; CSO inputs to the negotiation process (e.g. in Serbia) also including pre-consultations with civil society ahead of Special Group meetings (e.g. for PAR) (e.g. in Montenegro and in Serbia). Strategic documents of the EU (e.g. programming documents, EU accession strategies) mention consultations with civil society and it is visible that received inputs from such consultations have been taken into account. For example, both Sector Reform Contracts for PAR for Albania and for Serbia note that the EU delegation involved the civil society also in the process of elaboration of this programme. In Albania, the document mentions *“a consultation meeting on the draft sector budget support operation for PAR took place in July 2015 which mainly focused on discussion regarding the role of the civil society in policy making and monitoring of the PAR strategy implementation”*⁴⁹. In Serbia, social partners and civil society organisations has been consulted throughout the design, of the interventions foreseen in the PAR Sector Planning Document (2015-2017) through the SECO mechanisms set up formally under the SEIO for civil society consultations. The document mentions that *“the social partners and CSOs have been actively engaged during the development phase of the PAR strategy and Action Plan, most notably with respect to the fifth specific objective of the Strategy, namely increasing citizen participation, transparency, improvement of ethical standards and responsibilities in performance of public administration activities”*⁵⁰.

On the other side, some countries, such as Bosnia and Herzegovina do not have developed civil society consultation mechanism as recognised in the Indicative Country strategy paper⁵¹. Interviewed stakeholders confirm the lack of consultation mechanism, noting that this is a weakness, though not entirely the fault of EUD. There have been various challenges within the civil society in terms of defining representation in sector groups in Bosnia and Herzegovina and varying degree of interest by organisations to participate in such events.

At the level of projects, it is evident that the majority of projects have been developed and implemented through consultation with different stakeholders, partners, possible beneficiaries, etc. as also confirmed by stakeholder interviews. Available ROM reports note that relevance of interventions is generally high and that interventions are

⁴⁶ <http://tacso.org>

⁴⁷ European Commission (2013); Meta evaluation of Component I IPA assistance, p. 52

⁴⁸ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey, p. 21

⁴⁹ European Commission (2014); Albania: Sector Reform Contract for Public Administration Reform; p. 20

⁵⁰ European Commission (2014); Serbia: Sector Reform Contract for Public Administration Reform; p. 18

⁵¹ See Indicative Country Strategy Paper for Bosnia and Herzegovina, p. 20

tailored to real needs, thus having more potential of local ownership and sustainability in the later stage. For example, the Kosovo* project “Support for social partners” has been prepared in close cooperation with applicants and partners and has come to a common denominator on social partners’ agreement on priorities for improving the quality and intensity of social dialogue in Kosovo. In Montenegro, a project implemented by UNDP conducted Post 2015 consultations in which over 12,000 citizens were directly engaged (half of them women) on post-2015 development and human rights priorities as well as on participatory monitoring for accountability. The results of the consultations have been directly used in the preparation of Support to Anti-discrimination and gender equality policies.

The Mid-term Evaluation of CSF also finds that “[a]t the level of projects, the CSF has systems and processes (such as consultations, negotiations, conferences and discussions) that link the objectives of the EU’s support to civil society and civil society itself, so that the determining of directions and priorities is evidence-based and participatory.”⁵²

Evidence gathered through document review and interviews confirms that, at country/intervention level, consultations take place and contribute to better alignment of EU assistance. For example, The Guiding Principles for EU Support to Civil Society in Turkey were developed from consultations with more than 730 CSOs and other stakeholders in Turkey and contain lists of indicative actions to meet the needs articulated by the CSOs. These needs are summarised through the “two key principles on which the CSF window for Turkey is based: improving the environment for active citizenship and strengthening the capacity of organised active citizens”⁵³.

In Bosnia and Herzegovina, the project *Capacity building government officials to engage in policy dialogue with CSOs* developed a web platform for sectoral consultation with CSOs within the process of the programming IPA II (online SECO mechanisms) and launched it on 22 August 2016. Mid-term evaluation of CSF noted that this platform has good prospects of reaching out to wider pool of CSOs. Stakeholders from Bosnia and Herzegovina interviewed within the scope of this evaluation see the web platform as important contribution of the EU support, however they are sceptical of its utility. Stakeholders note that the web platform is not very much in use, due to limited interest of civil society to actually provide inputs in programming.

Judgement Criterion 1.2: The EU’s approaches to supporting and engaging with civil society have evolved effectively in line with the needs of civil society actors over this period in the Enlargement region

The EU’s approaches in support to and engagement with civil society have effectively evolved according to the needs of civil society actors over the evaluation period, across the Enlargement region. EU has enlarged its focus to involve more systematically smaller grassroots organisations as well as those outside capitals, which has been valued as increasingly appropriate action across the board of stakeholders consulted for the evaluation. EU conveyed its engagement through capacity building efforts and action grants mainly, within which, according to the feedback from the CSOs, sub-granting has proved as extremely efficient tool. However, evaluations of grant schemes and consultations with CSOs emphasise the shortcomings of CfP procedures, and management of grant contracts, in terms of bureaucratic requirements and procedures, which affect the achievement of results of supported projects.

Another area where evolution was noted is a stronger demand by EU for a more structured dialogue and cooperation between civil society and government as well as the private sector. This has proved to be very good approach to help connect different actors through joint projects and actions, contributing to reduced animosities and increased sustainability of actions, as confirmed by document review and stakeholder interviews.

EU is altering its approach from project-based support towards more flexible approach through longer-term contracts and sector budget support. This is useful having in mind extensive time and resources needed for preparation of proposals on one side and managing contracts on EUD side. However, the sector budget support is still not sufficiently engaging civil society beyond consultations and this is a main weakness of the EU support as a whole. There seems to be a lack of full understanding and grasp of what mainstreaming of civil society actually means across EUDs but also civil society stakeholders in the region, as found by this evaluation. In such situation, standard projects/programmes with/for civil society are viewed as the only avenue for targeted support.

⁵² European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey, P. 7

⁵³ TACSO; Organisation and Methodology, p. 23

Without limiting itself to a certain implementation modality, the EU applies several different ones, including technical assistance, service contracts, framework partnership agreements, operating grants, etc. For example, smaller grassroots CSO's are supported through financial (sub-grants) as well as non-financial (capacity building) means. However, as reviewed project level documentation shows, one of the possible challenges to the appropriateness of implementation modalities are delays that can happen between opening the CfP to contracting and to implementation.

The engagement with the civil society has been conducted through a combination of targeted and mainstreamed support and a policy dialogue, and it has been considered appropriate as such. While targeted support offers the space for CSOs to grow their capacities by implementing actions of importance for their constituencies, mainstreamed support in theory allows the implementation of innovative projects within the framework of sector support. There are only limited number of examples of mainstreamed support (for instance, a monitoring of Public finance management project was granted to civil society in Bosnia and Herzegovina). At the same time, a continuous effort is invested in the promotion of civil society role in policy processes as well as in political dialogue. EU policy dialogue engages with and supports civil society directly, while also assisting governments improve their consultation mechanisms and transparency through TA for government offices in charge of cooperation with civil society.

Indicator 1.2a

The appropriateness of the targeting of engagement activities, including outreach and diversification questions

Capacity building support has an invaluable contribution to the development and sustainability of civil society in general. Engagement activities have in general been increasingly appropriate, though as noted in indicators above, evolution is visible in the way in which the EU has reached out to a wider pool of organisations outside capitals. There is an inherent struggle in programming and implementation of assistance for the EU to ensure rules and procedures are adhered to and that there is sufficient outreach to small local organisations. In other words, the EU rules are very strict and demanding, restricting access to only the more developed, centrally located organisations. The use of the English language is also a strong limitation as perceived by organisations. These areas represents main criticisms of the EU, with argument that they inhibit the ability of small organisations without the required financial turnover, references or staff capacities to access funding⁵⁴. Evidence collected through document review (programming documents, CfPs and also project documentation) and stakeholder interviews shows that the EU is investing efforts in empowering grassroots organisations through both capacity building and grants. For instance, across the Enlargement region the Civil Society Facility calls for sub granting as integral component of supported CSO actions. Also, across the region there are specific capacity building interventions, such as the Technical Assistance to Civil Society (TACSO) and the UNDP (Re)LOAD project.

All projects that had a sub-granting component have reported that grant making is continuously endorsed by CSOs as being an extremely effective tool for capacity building. However, evaluations of grant schemes and consultations with CSOs in recent years (e.g. the Euclid Networks' review of PRAG in 2012 and Mid Term-Evaluation of CSF) and also stakeholders interviewed for the purpose of this evaluation stressed that a) Procedures related to CfPs need to be simpler, with less delay between the launch of the CfP and award of grants; b) Management of grant contracts need to be less burdensome for smaller CSOs; c) CSOs require more support in developing and managing Monitoring and Evaluation (M&E) systems. Documents and interviewees place emphasis on the need for M&E to provide guidance on how implementation can be improved to achieve the expected results, rather than simply focused on compliance with the contractual arrangements.⁵⁵ Stakeholders also reiterate the findings from evaluations of projects that do include sub-granting schemes that administrative and financial monitoring is a difficult process for the sub grantees in terms of complexity of procedures, forms of instruments, technical terminology used due to lack of their skills or language abilities, etc.

With regards to diversification, evaluation found gradual shift towards a demand for more structured dialogue and engagement with civil society and government as well as the private sector across the Enlargement region. A review of CfPs for CBC and CSF shows an increasing demand for joint projects not only to be prepared in partnership between civil society partners, but also between civil society and governments (e.g. civil society and local governments for CBC programmes) or civil society

⁵⁴ See Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey, the 2012 Thematic Evaluation of EU's Support to Civil Society in the Western Balkans; TACSO needs assessments; CSO reports (e.g. BCSDN, etc.)

⁵⁵ See Midterm Evaluation of CSF, the Euclid Networks' review of PRAG in 2012 or Final evaluation of the Civil society in action for protection of child rights in Albania

– local governments – private sector. This is a very good approach, as it helps sustainability of actions but also brings together different sectors, which can help, among other things, to reduce animosities and a ‘silo’ approach to local development.

Sub-granting is certainly a model that brings results, though some areas of improvement have been found in terms of investing additional effort in guiding the grantees during the project preparation and building their capacities to successfully implement projects. EU support to civil society already goes in that direction. For example, the Sivil Düşün project has capacity building and grants schemes; the UNDP implemented ReLOAD project, which is now implemented at the regional level, also has components of capacity building and grants. EUD in the Republic of North Macedonia plans to launch a project of Technical Assistance to civil society, which will have a strong focus on grass roots civil society organisations, including capacity building and small grants scheme. Such practices offer good examples of feasible methods for engagement with civil society in the Enlargement region.

It is evident that the EU’s approach towards longer-term contracts and sectoral support has been evolving too, given that capacity building and advocacy require time and resources. As explained in the interviews with EUDs and also the Guidelines, the EU is creating a shift from project-based support towards a more flexible approach, encouraging partnerships and coalitions, that result in regranting and joint applications to ensure that EU support responds to their immediate needs. Hence, the EU is increasingly supported by sector programmes to strengthen their role and capacity in being active in the formulation and implementation of sector strategies for financial support from the EU. There is a view that, in such a way, with the advancement of EU enlargement candidates and potential candidates, the Commission supports CSOs to be less dependent on international donors’ funding, the EU included. However, document review and stakeholder interviews do not show strong mechanisms for mainstreaming of civil society in sectoral programmes, beyond consultations.

IPA I had civil society as the main target of EU support activities, as found in document review and confirmed in interviews. A slight expanding of support focus to other types of civil society actors is visible in later years of IPA I and particularly in IPA II. Review of CSF grants and their implementing partners show that there is more inclusion of a wider pool of civil society and investment in social dialogue.

Indicator 1.2b	The appropriateness of choice of implementation modalities
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As noted in the Mid-term Evaluation of CSF (2017), EU uses a variety of appropriate implementation modalities for targeted support reflected in technical assistance service contracts, framework partnership agreements, operating grants, long and short-term single country and multi-beneficiary action grants, including those with sub-granting components. Since the introduction of CSF, more efforts have been invested in outreach to smaller grassroots CSOs through provision of financial (sub-grants) and non-financial (capacity-building) support to these organisations via grant contracts signed with larger CSOs (having the proven capacity for these and such functions). The Mid-Term Evaluation of CSF also found that the CSF was effective in reaching out to smaller and/or stakeholders and is developing and implementing innovative approaches. The Evaluation also noted organisational/administrative constraints within DG NEAR as well as in the EUDs, as limited staffing constrains possibilities in terms of the numbers (and sizes) of awarded grants. Similarly, EIDHR has been instrumental in reaching smaller organisations, particularly upon introduction of different LOTs that provide chance for small, grassroots organisations. The Mid-term Evaluation finds that “[t]he CSF’s measures to grow timeframes of support, with three to four-year frameworks, ensure the continued relevance and responsiveness of organisations to develop their profile and sustainability, while at the same time providing ongoing support to legal reforms and policy initiatives.”⁵⁶

EU has primarily been working with/for civil society through action grants and in some cases service contracts. Within the IPA II budget support programmes, there is an intention to mainstream civil society as well. However, the mainstreaming of civil society through budget support programmes has not been very evident, as found in

⁵⁶ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey, P. 7

desk review and confirmed through stakeholder interviews. Interviewees note that civil society is consulted in programming of assistance, including sector budget support (such example is consultation process for budget support to PAR in Montenegro); however civil society is not benefiting from such support interventions as of yet.

When it comes to regional vs. national projects and support, evaluation found a good balance between national and regional CSF projects portfolios. A review of the CSF portfolio for the period of 2011-2017 shows that 73 projects out of total of 362 projects were regional projects supported through CSF. Regional projects are mainly directed towards supporting regional CSO networks active in different sectors, e.g. media, energy and environment, peace building, etc. Document review and stakeholder interviews accentuate that regional support was appropriate and helpful, particularly for subjects of regional interest.

Besides, EU support to civil society was channelled through EIDHR and direct IPA support (e.g. CBC). Both EIDHR and IPA CBC have been appropriate instruments through which civil society was supported, as confirmed by stakeholder interviews. For example, Evaluation of EU IPA CBC Programmes 2007-2013 found that CBC offered significant support to grassroots organisations, enhancing cross border but also cooperation between civil society and local authorities across the region⁵⁷. EIDHR also supports democratic processes with a specific focus on *“cooperation between civil society and local authorities and relevant state institutions, areas which offer complementary support to the CSF, while also adding strong emphasis on vulnerable groups”*⁵⁸.

One of the potential challenges to the appropriateness of implementation modalities are delays that happen in the period between opening the CfP to contracting and to implementation. Document review and interviewed stakeholders share insights into delays that happened in this process, affecting planning of activities and their relevance.

Indicator 1.2c	The appropriateness of forms of engagement with civil society (targeted support, mainstreamed support, policy dialogue)
	<p>From the perspective of EU accession process and overall democratisation efforts, the combination of targeted support, mainstreamed support, policy dialogue, is appropriate. This is primarily from the CSO developmental point of view: targeted support offers the space for CSOs to grow their capacities by implementing actions of importance for their constituencies. This at the same time helps them professionalise and become recognised as actors in some sectors, as also confirmed in stakeholder interviews. In turn, such professionalisation and recognition helps them to provide meaningful input and work within respective sectors, which also helps develop a more coherent mainstreaming of support.</p> <p>The mainstreamed support has also offered the possibility for interesting and innovative projects funded within the framework of sector support to be implemented. For example, EU supported civil society perform monitoring role in the sectors of Public Finance Management, PAR and justice/rule of law through country specific or regional action grants.</p> <p>Policy dialogue, on the other hand, helps CSOs as a result of leverage the EU has with governments (also using the EU accession requirements as a stick/carrot) ensuring that the government creates more favourable conditions for civil society. The Mid-term Evaluation found that <i>“[t]he CSF’s measures to grow timeframes of support, with three to four-year frameworks, ensure the continued relevance and responsiveness of organisations to develop their profile and sustainability, while at the same time providing ongoing support to legal reforms and policy initiatives.”</i>⁵⁹ In this way, EU ensures a holistic approach to building a more stable and strong civil society, as confirmed by stakeholder interviews. Political dialogue and promotion of civil society role in policy processes, particularly within the scope of EU accession, has been an ongoing effort. The EU uses various modalities for such initiatives such as a) structured dialogue with civil society on issues relating to EU accession negotiations (e.g. chapters and/or supported sectors); b) opening the space for systematic inputs of CS into EU progress/country reports; c) dialogue with governments on issues relating to enabling environment for civil society; d) supporting country wide and regional networks; e) contributing to other related EU, MS or regional initiatives (e.g. the</p>

⁵⁷ See European Commission (2017); Evaluation of EU IPA Cross-Border Cooperation programmes

⁵⁸ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey, P. 67

⁵⁹ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey, P. 7

Berlin process). These modalities are generally appropriate and provide for effective support to civil society, as also emphasised by stakeholders interviewed within the scope of this evaluation, who highlight the fact that such combination of support is critical in Bosnia and Herzegovina (country where field mission took place) to ensure that civil society is engaged in policy processes as a relevant actor.

The combination of targeted and policy support is visible across all countries. EUDs invest efforts to promote the role of civil society in programming process, whereby it is also a signal to the host governments that such practices should be extended in their policy-making processes. In particular, ahead of each meeting of Special Groups (e.g. for PAR), EU delegation meets with civil society. At the same time, Special group for PAR conclusions include statements showing the need for more transparency and engagement of civil society. In Bosnia and Herzegovina, civil society participates in this process too, and the feedback from CSO representatives is that engaging in such sector policy level discussions is of critical importance not only to provide inputs in the process but also to empower civil society to invest further efforts in their professionalisation and building expertise in certain respective areas.

The EU has extended its policy dialogue with governments by offering TA for government offices in charge of cooperation with civil society. Such a case is found in Serbia, where a TA was implemented to support the Office for Cooperation with civil society. In Bosnia and Herzegovina, consecutive rounds of TA for government to establish and maintain mechanisms for consultation with civil society were funded. In Turkey, policy dialogue is an important and integral part of EU's engagement with civil society and with government, particularly since 2016 after the failed coup. The EU has been a vocal supporter of civil society and also revised mechanisms for CSO support, ensuring bulk of funds are directly provided to civil society and not channelled through the indirect management, as it was the case previously. Stakeholder feedback during interviews has been that such approach through TA was very appropriate and beneficial for the government but also civil society in Bosnia and Herzegovina, as it produced a set of mechanisms for ensuring participatory policy processes and transparency of legislative work.

Indicator 1.2d

Consultations with civil society actors and organisations were used to inform the evolution of EU approaches.

The extent to which EU consults with civil society in their programming has already been tackled in the Indicator 1.1.c. It is clear that the EU is increasingly establishing and using mechanisms for consultations with civil society at different stages of policy cycles. There is evidence that consultations with civil society actors and organisations were used to inform the evolution of EU approaches, particularly adapting the manner in which EU organises its financial assistance, as confirmed by stakeholder interviews. For example, at the onset and throughout IPA I, the EU was in charge of contracting for civil society directly, with a number of projects being implemented throughout countries but with organisations located in capitals. The EU is shifting its approach towards enabling outreach to grass roots civil society organisations, and also enabling organisations to act as grant-distributing agents within sub-granting schemes, particularly within the framework of IPA II. Through consultations with civil society and other actors, the EU is also increasingly opening up space for sub-granting; and also, direct reach to smaller (outside of the capitals) organisations through introduction of two Lots in CfPs (e.g. EIDHR is increasingly organised in such manner to have two Lots, offering a chance for smaller organisations to compete for funds).

Specifically, in Turkey, following consultations with civil society and also based on thorough context and needs assessment, EU recently moved towards direct grant making to civil society through CSF, particularly following the attempted coup and subsequent complexities for civil society. The report on Trends in Turkish Civil Society noted that *“EU has responded to the shrinking space in Turkey in two ways: first, by shying away from overtly political projects to focus much of its civil society support on important but less controversial efforts such as refugees and gender rights, and second, by making its more political support—and its overall funding—easier to secure and less burdensome to maintain for activists, in the hope that these steps will stimulate organic civic action”*⁶⁰.

60 Center for American Progress, the Istanbul Policy Center, and the Istituto Affari Internazionali (2017); Trends in Turkish Civil Society; <https://www.americanprogress.org/issues/security/reports/2017/07/10/435475/trends-turkish-civil-society/>

EQ2 (Efficiency): To what extent has the scale of resources deployed been justified considering the changes/results produced? To what extent have efficiency gains, or losses, occurred?

The context in which civil society operates within the Enlargement region is complex with many important political, social, economic factors playing a decisive role in enhancing the position, recognition and capacities of civil society. EU engagement through financial and non-financial means has been extensive, with EU's role increasingly becoming decisive particularly in the reference period of the evaluation, which was marked by shrinking donor support and the global economic crisis. Evaluation found that the EU is the single most important donor for civil society in the region⁶¹. For example, a study conducted by the Balkan Civil society Network, which noted that EU has invested the most of all donors across the Western Balkans region, with variations in Montenegro and Kosovo, where Swedish Sida and Norwegian invested comparatively more in the 2011-2012⁶². In Turkey, the EU is by far the most important player. European Union funding for Turkish civil society has been essential to the growth of the sector overall, and to the survival of many rights-based groups and advocacy organisations, particularly those operating on politically or socially sensitive issues.⁶³ The EU has committed €4.45 billion in pre-accession funds to Turkey over the 2014–2020 period, including €1.58 billion for democracy, governance, and rule of law. A good portion of this money is funnelled through civil society mechanisms.⁶⁴ Reviewed EU policy and programming documents, independent and external sources reports and studies but also stakeholders interviewed within the scope of this evaluation consider that resources invested over the reference period of the evaluation may be considered justified taking into account the needs and capacities of civil society sector but also the democratisation and EU accession priorities for the region.

Main efficiency losses have been noted in the delays within the process between launching the CfPs and contracting-implementing projects. Such delays negatively impact the relevance of funded interventions. On the other side, the main efficiency gains have been noted in the combination between targeted/mainstream and policy support, whereby EU policy/political leverage influenced faster achievement of objectives in some cases (e.g. in Serbia with establishment of the Office for Cooperation with Civil society; inclusion of civil society in government sector working groups and other policy processes across the region, etc.)

At interventions level, evolution of EU support to focus more strongly on outreach to grass roots through sub-granting and diversification of funding modalities has brought stronger results in terms of preventing inadequacies in the level of capacities of organisations in the centres/capitals and elsewhere. This points to justification of scale of resources deployed, though weaknesses in the approach still exist.

Utilisation of pooling resources to achieve cost effectiveness is not happening towards strengthening of civil society. EIDHR and CSF do invest in analysis of potential synergies and complementarities between the instruments as well as in selection of projects. A great care was taken of institutional capacity assessment of partner organisations at all levels (programming, implementation, monitoring), as all EU programming documents are based on thorough analysis of the relevant factors in the referring country. However, most salient weaknesses are noted in the way EU analyses achievement of results through collecting and analysing indicator level data, and a lack of systematic utilisation of ROM systems, i.e. lack of independent monitoring assessment of interventions. Evaluations of EU support to civil society are consistently performed, and this helps understand the extent to which EU was effective and brought results.

⁶¹ European Commission (2014); Guidelines for EU support to civil society in enlargement countries, 2014-2020, DG Enlargement, p. 4

⁶² BCSDN (2012); Donors' Strategies and Practices in Civil Society Development in the Balkans: Civil Society: Lost in Translation? <http://www.balkancsd.net/novo/wp-content/uploads/2012/02/81587797-BCP-8-Donor-Strategies-and-Practices-in-CSDev-in-the-Balkans.pdf>

⁶³ Third Sector Foundation of Turkey, "Sivil Toplum İzleme Raporu 2013–2014: Yönetici Özeti."

⁶⁴ Richard Youngs and Müjge Küçükkeleş, "New Directions for European Assistance in Turkey" (Istanbul, Turkey: Istanbul Policy Center, 2017), available at <http://ipc.sabanciuniv.edu/publication/english-new-directions-for-european-assistance-in-turkey/?lang=en>.

Judgement Criterion 2.1: The scale of resources deployed for targeted support has been appropriate in the Enlargement region

Overall, document review and stakeholders interviewed within the scope of this evaluation consider that the scale of resources deployed for targeted support has been generally appropriate in the Enlargement region for the needs and scope of civil society.

Considerations of cost-efficiency

The EU has continually improved the extent to which the resources are deployed in more cost-efficient manner, particularly since a separate facility, CSF, was established helping organisation of EU assistance to civil society in more transparent and coherent manner in comparison to pre-CSF IPA assistance which was more erratic. The EU also increasingly organises more tasks under one Terms of Reference (and contract), which helps concentrating more services and action grants with less contracts and larger funds. This is considered to be an important cost-efficiency gain for EUDs, which were struggling with large number of contracts before.

EU generally includes elaborate log frames at all levels of strategic documents relating to CSOs. Review of indicators shows that they are generally SMART, albeit with variations. However, weaknesses evidenced by this evaluation are found in the weak or no reflection of achievement of strategic level results of instruments or CfPs by EU. External evaluations are conducted and assess to varying level the achievements as per set indicators, but this is also not done systematically. Another weakness is a lack of systematic utilisation of the ROM system. Monitoring and evaluation framework although envisaged to be established for programmes and policies, is very generic and lack an extensive explanation on how these mechanisms will be operationalised.

Evaluation found several challenges affecting efficiency of projects funded within the EU framework of support to civil society include delays in the process between CfPs - assessing proposals – contracting occurring due to various reasons (bureaucratic procedures, contextual issues or changing project structure during the implementation). Document review and interviews also point to limited flexibility at the level of EUD and DG NEAR relating to financial administration, and/or issues with ensuring co-funding by CSOs. This is a single biggest weakness of EU approach, which creates obstacles for civil society to benefit from the EU support.

Increased outreach to grass-root organisations

Another input to increased appropriateness of deployment of resources is the evolution in the approach towards engaging with grassroots organisations, particularly since IPA II, when sub-granting schemes started to be more common types of interventions. Compared to the early stage of IPA I when the outreach was difficult for many reasons, CSF and IPA II took a step forward and integrated sub-granting as a significant component of the funding instruments. This is seen as an effective tool to ensure outreach and capacity building of grassroots and small CSOs. Review of other instruments for support to Civil Society such as EIDHR and IPA Cross Border as well as the review of sampled projects indicate a good outreach to grassroots.

When it comes to the institutional capacity assessment of the partner organisations at programming, implementation and monitoring stages, this measure is included as a rather standard activity, which helps the EU and implementing partners base their further capacity building activities. All EU programming documents are based on a detailed analysis of the context and the state of CS in the given country, while the TACSO project regularly includes Need Assessment reports for each country. Projects offering capacity building and/or institutional development of different target groups (including government) across the Enlargement region are usually based on the previous assessment results as evidenced through document review and interviews.

Pooled resources

EU operates mostly as the single donor, with only a few projects being co-financed by the government. Pooling of resources has not been utilised to achieve cost-effectiveness thus far in the Enlargement region.

Indicator 2.1a	Extent to which the choice of modality, and their mix, led to increased outreach to grass-root organisations
<p>The mix of implementing modalities have been mostly appropriate with a caveat that there has been an evolution of the approaches based on lessons learned from earlier stages of IPA I. In the early stage of IPA I, particularly before introduction of CSF, outreach to grassroots organisations was difficult for many reasons, particularly organisations' weak capacities and lack of funds to secure as co-funding that was required in CfPs, as also confirmed through stakeholder interviews. Weak organisation capacity and lack of co-funding are also recognised as challenges for many organisations applying for EIDHR. With CSF, and increasingly so in IPA II, sub-granting is integrated as a significant component of the funding instruments as an effective tool to ensure outreach and capacity building of grassroots and small CSOs. A review of CSF programming documents and CfPs but also stakeholder interviews point to increased openness to sub-granting components of projects, and these are in fact encouraged. The main challenge faced by CSOs who should/could implement sub-granting schemes relates to the administrative, capacity, accountability and financial burden of doing so, which inhibits their participation, as emphasised by interviewed stakeholders as well. This is particularly true in cases when new or small grassroots organisations are being engaged for implementation of small grants. Interviewed stakeholders share that it is difficult to adhere to EU rules and accountability mechanisms in cases where new grass roots organisations are engaged in projects, as in most cases these organisations are not aware or versed in financial or project management, which raises problems with collection of financial documents and reports. This is perceived as a threat to big organisations, which can perform sub-granting as they are primary accountable to the EU.</p> <p>Stakeholder interviews confirm the finding of the Mid-term evaluation of CSF that <i>“the CSF uses a mix of funding instruments to respond to different types of CSOs, the needs of beneficiary organisations and country and regional contexts. It does this in a relatively flexible, transparent and generally efficient way, using a results-focused approach. In developing its mix of instruments, the EC has framed a number of priorities, each of which has an impact on the instruments overall, and on the action grant instrument. These priorities include a focus on longer-term grant contracts, moving away from project-based support to a more flexible approach, fostering partnerships and coalition-building, and a greater outreach to grassroots and community-based organisations”</i>⁶⁵. Review of other instruments for support to CS, such as EIDHR and IPA Cross border cooperation programmes (IPA CBC), also show a generally good mix of modalities and outreach to grassroots – particularly visible with IPA CBC.</p> <p>At the level of projects, the review of sampled projects funded by different instruments (EIDHR, CSF) at multi-beneficiary or national level shows that most projects do include outreach to grassroots in one way or another. This is mainly through conducting some kind of capacity building and/or networking among organisations of different competency. The increasing demand to have proposals based on thorough consultation between project partners and having more partners in an intervention also helps extend the outreach and capacity building of wider pool of organisations benefiting from but also contributing to set objectives.</p>	
Indicator 2.1b	Extent to which pooling of resources has been utilised to achieve cost-effectiveness
<p>This evaluation did not find evidence of pooling funding to achieve cost effectiveness in terms of strengthening civil society. A review of EIDHR and CSF documents and interviews shows that EU invests efforts to present other donors' financial support to the sector and openness to seek synergies and complementarities between the instruments, also in selection of projects.</p> <p>EU support to civil society has been designed in such a way to bring together and enhance EU support at bilateral and multi-country level. For example, in 2014 and 2015 the total CSF programme was 68,000,000 EUR out of which the multi-country part was 30,300,000 EUR. In the period of 2016-2017, the total programme was 87,000,000 out of which 38,500,000 EUR went for multi-country part. By 2018, a total of 210 projects across the region have been implemented out of which 66 are multi-country projects.</p>	

⁶⁵ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey, P. 32

At the project level, it is evident that most of the sampled projects reviewed within the scope of this evaluation have been financed only by the EU, with no additional fund from other donors. However, some projects have been co-funded by the government (e.g. Enhancement of Turkish energy sector in line with the EU energy priorities and strategies project was co-financed by Republic of Turkey or Project “Return of Refugees Kosovo” was co-financed by the Ministry of Community and Returns (MCR) with 1.1 MEUR). In Bosnia and Herzegovina, the Social Housing project signed Memorandums of Understanding with partner Local Governments for co-funding thus contributing to local ownership and sustainability of the initiative.⁶⁶

Indicator 2.1c

Extent to which considerations of cost-efficiency played a role in the use of available instruments (geographical and thematic) and aid modalities

Some insights on this indicator are provided in Indicator 2.1b above. Interviews with EUD teams emphasise the fact that there are considerations of cost-efficiency in preparation and use of available instruments, and efforts to maximise the funds to extent possible. For instance, EU information packages discuss the need and orientation towards **use** of EU assistance through a suitable combination of its financing instruments in a “*flexible, transparent, cost-effective and result-based manner, keeping due consideration of the Commission’s administrative burden*”⁶⁷. In other words, this orientation is towards long-term contracts with sub granting components, which relieve the EU administrative burden but also ensure stronger ownership over results for civil society in targeted countries.

Also, there is an increased focus on combining different tasks under one contract, which helps more comprehensive approach to interlinked group of tasks, but also contribute to cost-efficiency in terms of resources both on EU and the service provider side. Such example is the ongoing “*Support measures of the implementation of the Civil Society Facility 2018/19 in Turkey*”, which combines the components of 1) drafting the guidelines of the Call for Proposals for Activity 3 of the Action Document (i.e. the Supporting cultural initiatives as a mean to promote freedom of expression, dialogue, tolerance and fight against discrimination); 2) conducting a mid-term evaluation of the project IPA/2018/401-501 - Monitoring human rights situation and advocating for compliance with international human rights framework funded under CSF 2017 in view of the implementation of Activity 4 of the Action Document; and 3) assessing three Calls for Proposals⁶⁸.

Indicator 2.1d

Extent to which efficiency gains, or losses, have occurred

Mid-term Evaluation of CSF noted some challenges affecting efficiency of projects which were also confirmed in stakeholder interviews, including the following:

- Limited flexibility at the level of EUD and DG NEAR relating to financial administration.
- Delays with calls for proposals and in assessing proposals happens mainly due to mismatch between the amount of bureaucratic procedures and constrained staffing at EUD and DG NEAR levels related to conceiving, preparing, issuing and then managing calls for proposals. The process is time consuming, particularly for those Calls with greater complexity in types of grants (e.g. subcontracting).
- Issues with ensuring co-funding by CSOs
- Issues relating to variations in project design, demanding individual approach in many occasions, etc.

Evidence collected through document review and stakeholder interviews on sampled projects for this evaluation confirms the findings of the Mid-Term Evaluation. Project encounter delays due to various reasons, including bureaucratic procedures; contextual issues (e.g. political) or changing project structure during the implementation.

⁶⁶ ROM Report, p. 11

⁶⁷ See <http://historiku.integrimi.gov.al/en/program/albania-and-eu/eu-and-civil-society>

⁶⁸ Specific Terms Of Reference “Support measures of the implementation of the Civil Society Facility 2018/19 in Turkey FWC SIEA 2018- LOT 3: Human Rights, Democracy and Peace Request for Services n° 2019/407662; EuropeAid/138778/DH/SER/multi

For example, in Turkey, a Project *The Enhancement of Turkish energy sector in line with the EU energy priorities and strategies* was halted for two years between signing of the administrative agreement to project commencement. Also, within *the Turkish Technical assistance for EU Civil Society Support project*, certain losses have occurred after the coup attempt in 2016 and in the course of the state of emergency that was announced after the coup attempt. The main problem was the inability to allocate 100% of the available resources due to the fact that various organisations were closed down during the state of emergency.⁶⁹ In Bosnia and Herzegovina, some temporary losses and delays have been notified in two projects Capacity building government officials to engage in policy dialogue with CSOs (Bosnia and Herzegovina)⁷⁰ and within project BASE - Building Accountability and Systems in the Elections, due to changing the base of projects between line ministries or delays with approval of Project plans.⁷¹

On the other hand, analysis of available ROM reports shows that all projects have efficiency ratings A or B. There are no C or D ratings.

Indicator 2.1e	Extent to which institutional capacity of partner organisations was assessed at programming, implementation and monitoring stages
	<p>There is extensive evidence of institutional capacity assessment of partner organisations at programming, implementation and monitoring stages. All EU programming documents are based on a thorough analysis of the context and the state of civil society in the given country (or regionally). Besides, the TACSO project has conducted regular Needs Assessment reports for each enlargement country. These reports have been a critical input for the EU but also for other donors to understand better the current governmental, financial, capacity context within which CSOs operate, making the TACSO project a single most important value added intervention of the EU in that regard.</p> <p>At the level of projects, a large number of reviewed projects that integrate a capacity development component within their structure have conducted need assessment (NA) based on which they plan their capacity building activities. Notably, the Project “Strengthening the EU – Serbia civil society dialogue” conducted a comprehensive need assessment as a preparation for a sub-granting scheme aiming to identify exact areas in which Serbian civil society should be strengthened. In accordance with the NA recommendation, the project planned and chose the projects to be funded under its sub-granting scheme.</p> <p>Another example is a <i>Stronger CSOs for a participatory transposition and implementation of the EU 2020 climate and energy package</i> project in the Republic of North Macedonia that based its interventions on the assessment results, thanks to which the criteria was established to select 10 CSOs to strengthen and build capacities on the topics related to the sector in which the project worked (the EU 2020 climate and energy package).</p> <p>In Albania, <i>Civil society in action for protection of child rights</i> in Albania has performed a “Mapping of the civil society actors focusing on the protection of the rights of the child at local level” which has enabled the project to identify, update the existing data base of these actors and identify potential participants in the organisational assessment, capacity development program, sub-granting scheme, as well as networking. The mapping process has kept a special focus on civil society actors from remote and/or rural areas.</p> <p>The review of sampled regional projects show that all these projects in the evaluation sample integrate some kind of needs assessment either in project formulation or at inception phase. These needs assessments are used to inform capacity building activities of their partners and beneficiaries (in most cases other CSOs or associations active in respective fields).</p>
Indicator 2.1f	Extent to which monitoring and other mechanisms are deployed in order to ensure cost-effectiveness of targeted support

⁶⁹ Project Final report, p. 33

⁷⁰ The 2010 Project monitoring report, p. 3

⁷¹ The Project ROM report, p. 9

The programming documents at instrument and project level are required to have a set of indicators, which are included in the log frames for all levels of interventions. Indicators are generally SMART, though variations exist and are linked to the level of quality and elaboration of indicators particularly at overall objective and purpose levels. However, there is little evidence of systematic monitoring or reflection of achievement of results, particularly at instrument (e.g. strategic or action fiche) levels. Except by means of external evaluations, to varying degree, there are no records of systematic assessment of results of an instrument (e.g. CSF) whereby indicators would be analysed and reported on.

At the strategic level – across the EU engagement with Civil society, TACSO was tasked to establish the monitoring system of the 'EU Guidelines for support of CSOs 2014-2020'. The monitoring system was to include both qualitative and quantitative monitoring data needed to assess progress regarding the enabling environment and CSOs' capacities. The system envisaged metrics assigned to estimate the progress per indicator included in the Guidelines. TACSO report notes that the system “enables: a) systematisation of all information needed and gathered, 2) regional comparison while monitoring country progress/or changes, 3) screening of the situation against the EU Guidelines. Finally, as a consequence, the monitoring reports, countries' 'Traffic Lights', are more structured and harmonised.”⁷² The system enabled linking between the monitoring system with the TACSO needs assessment reports, taking out and triangulating data gathered from both sources into more balanced information on the state of play in the CS sector. The system also integrates multiple perspectives starting from the existence of a legal framework, to perceptions of those concerned in order to assess progress against the EU Guidelines. However, at the time of this Evaluation, the third cycle of TACSO was finalised and, and the new TACSO just started. At the time of the field work, the (previous phase) TACSO website was down, which made it impossible to access either the TACSO library. Available regional report from 2015 presents a very detailed analysis of all spheres of Guidelines as per set indicators⁷³. This is a major shift in monitoring of effects of EU assistance as during IPA I, monitoring was not done systematically, with ROM reports not covering any systematic percentage of funded projects, with regular progress reports and ad-hoc observation of CSO events as main monitoring approaches.

At the level of instruments, the monitoring framework includes the following means: “a) ROM system; b) IPA Beneficiaries own monitoring; c) self-monitoring performed by EUDs; joint monitoring by the European Commission (DG NEAR) and the IPA beneficiaries, whereby the compliance, coherence, effectiveness, efficiency, and coordination in implementation of financial assistance will be regularly monitoring by an IPA Monitoring committee.”⁷⁴ At the level of projects, constructive information of how M&E was integrated in the project structures was very limited in project documents reviewed. Almost all projects based their monitoring on developing Annual Workplans as the main monitoring instrument used to help prepare interim and final reports. Still there are some exceptions. For example, projects that integrate sub-granting most often include more elaborate monitoring frameworks as tools for monitoring of sub grantees and their projects. Some projects, such as the Project “Strengthening Serbia-EU Civil Society Dialogue” also present a well-developed monitoring system that help establish progress against indicators set forth in their results framework together with a simple reporting system for monitoring visits which proved to be a good example of keeping track record of all implemented activities and results achieved. Another good examples are the two UNDP projects: “Monitoring and evaluation of Economic and Social Empowerment for Roma and Egyptians- a booster for social inclusion (ESERE) in Albania and Support to Antidiscrimination and gender equality policies Project in Montenegro which developed their monitoring frameworks in accordance with UNDP monitoring and evaluation plan.

Across the board of sampled projects but also the entire ‘universe’ of funded projects more generally, it is evident that the ROM system is not systematically applied. This is an important weakness, particularly from the perspective of having externally commissioned ROM monitors who could provide for an independent monitoring assessment of interventions. This evaluation did not find evidence of misuse of funds or corruptive practices.

Judgement Criterion 2.2: The scale of resources deployed for mainstreamed support has been appropriate in the Enlargement region

There is very little conclusive evidence about the extent to which resources deployed for sector budget support actually truly mainstream civil society in the Enlargement region. There is also little evidence of efforts taken to monitor the extent to which mainstreaming support assists strengthening of civil society across different sectors.

⁷² TACSO Interim report 6, 2016, p. 26

⁷³ Balkan Civil Society Development Network (2015); Monitoring Matrix on Enabling Environment for Civil Society Development Regional Report 2015

⁷⁴ European Commission (2018); Civil Society Facility and Media Programme 2018-2019; p. 44 ipa_ii_2018-040-646_2019-040-647_civil_society_facility_and_media_programme_2018-2019

The reason was found in the fact that mainstreaming of civil society is still a rather unclear notion across stakeholders, including EUDs themselves. For instance, only one document, IPA II CFS -Programme 2018-2019, mentions that the IPA monitoring committee will be “supported by the Sectoral Monitoring Committees which will ensure a monitoring process at sector level.”⁷⁵ Regarding the assessment of institutional capacity of partner organisations at programming, implementation and monitoring stages, analysis of the sample of mainstreaming projects does not provide any in-depth view on this aspect. Mainstreamed projects do provide analysis of the sectors of focus, but in most cases such projects do not elaborate on civil society.

Indicator 2.2a	Extent to which monitoring and other mechanisms are deployed in order to ensure cost-effectiveness of mainstreaming activities
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There is very limited and random evidence on the monitoring and other mechanisms used to ensure cost-effectiveness of civil society mainstreaming activities. This is mainly due to the fact that mainstreaming of civil society is still an unclear concept, as explained by EU stakeholders interviewed within the scope of this evaluation. Overall monitoring mechanisms for sector budget support are there and are based on clear set of indicators, though indicators do not focus on civil society per se. Only the IPA II CSF Programme 2018-2019 mentions some elements of monitoring of civil society mainstreaming, noting that the IPA Monitoring Committee will be “*supported by the Sectoral Monitoring Committees which will ensure a monitoring process at sector level.*”⁷⁶ Except for this, there is no other evidence regarding monitoring or other mechanisms deployed in order to ensure cost-effectiveness of mainstreaming activities.

Indicator 2.2b	Extent to which institutional capacity of partner organisations was assessed at programming, implementation and monitoring stages.
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A review of the sample of mainstreaming projects does not provide an in-depth view on the extent to which institutional capacity of partner organisations from civil society was assessed at programming, implementation and monitoring stages. Mainstreamed projects do provide analysis of the sectors of focus, but in most cases such projects do not extensively elaborate on civil society. The exception are sampled projects that have been implemented by civil society (e.g. Project Pod Lupom in Bosnia and Herzegovina, Project to enhance the contribution of CSOs to the social and economic development of Montenegro; ProCure in Serbia or Press for Freedom project in Turkey). Nevertheless, these projects also do not contain elements of needs assessment envisaged or implemented in project formulation or implementation phases.

Judgement Criterion 2.3: The scale of resources deployed for policy-level engagement has been appropriate in the Enlargement region

Although there is a very positive ongoing effort regarding policy level engagement activities, there is no clear overview of cost-efficiency of this type of engagement. This is due to a lack of systematic records of meetings, events or any other activities falling under this type of policy efforts. The lack of systematic analysis of the extent of resources and efforts engaged in policy level engagement is seen as a very important shortcoming by this evaluation, due to the fact that the full deployment of resources is invisible. Existence of such analysis would have been beneficial to understand the actual extent of EU’s support, which would raise EU profile among civil society in the Enlargement region countries. Notably, there is a clear overlap between targeted interventions and policy engagement. Same as for the Indicator 2.3, there is a lack of evidence about the monitoring and other mechanisms deployed in order to ensure cost-effectiveness of policy-engagement activities.

Indicator 2.3a	Extent to which considerations of cost-efficiency played a role in the organisation of policy-level engagement activities
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Policy level engagement activities include all those non-financial activities undertaken or supported by EU in the policy arena. The EUD, DG NEAR staff and diplomats invest time and efforts to promote, support and leverage civil society role, particularly with governments. This is a very positive ongoing effort, as also confirmed through stakeholder interviews. However, this evaluation could establish a clear overview of cost-efficiency of such type of engagement. This is for the very reason that records

⁷⁵ European Commission (2018); Civil Society Facility and Media Programme 2018-2019; p. 44 ipa_ii_2018-040-646_2019-040-647_civil_society_facility_and_media_programme_2018-2019

⁷⁶ European Commission (2018); Civil Society Facility and Media Programme 2018-2019; p. 44 ipa_ii_2018-040-646_2019-040-647_civil_society_facility_and_media_programme_2018-2019

of all such policy efforts are extremely poor. For instance, it was not possible to find any systematic records of meetings, events, PR material that discuss and/or promote civil society.

Also, there is a notable overlap between targeted interventions and policy engagement. For example, EU provides targeted support for civil society actors and their networks and linked to results or needs arising from such support. EU engages in policy dialogue with governments to enhance enabling environment for civil society, etc. However, there is no analysis of resources and efforts invested at this level, and this is an important shortcoming from the perspective of this evaluation.

Indicator 2.3b	Extent to which monitoring and other mechanisms are deployed in order to ensure cost-effectiveness of policy-engagement activities.
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As noted in Indicator 2.3a, the policy engagement activities are extremely poorly recorded, as confirmed by document review and stakeholder interviews with core EUD teams engaging with civil society. There is a clear gap in monitoring which makes it difficult to assess the extent to which the EU leverage was actually instrumental for promoting and enhancing the role of civil society and enabling environment.

EQ3 (Effectiveness): What have been the effects of the EU's various forms of engagement with civil society in the Enlargement region?

EU engagement with civil society has been the part of the larger EU efforts to support the transition to democracy within the region and preparing countries for ultimate EU integration – and support to civil society has been an integral part of these efforts, in line with EU policies but also enlargement candidates and potential candidates aspirations. In some cases, like in Turkey, despite the standstill in the EU integration process, the EU continues supporting civil society to represent their constituencies and defend human rights and democratic values. The EU starts from the premise that democratic society must take the participation of civil society in decision-making processes as a political imperative, thus investing in empowerment and capacitating civil society across the Enlargement region to be(come) an active partner in policymaking processes. This has been an ongoing effort in two directions: ensuring governments understand the role of civil society and create/maintain mechanisms for cooperation; and 2) that civil society actors have the capacities, knowledge and credibility to provide adequate input. However, the level of investment within the two directions has varied (particularly dialogue with government) and depended on political and other governance circumstances.

Effectiveness with regards to civil society actors' capacities, knowledge and credibility

EU engagement through the three forms of support (targeted, mainstreamed, and policy dialogue) has brought overall positive effects over the reference period for this evaluation across the board of countries. The level of effectiveness varies when it comes to type of civil society actor (e.g. differences exist in the level of effectiveness on civil society organisations vs. civil society actors such as social partners, or other types of actors). Civil society organisations are the primary recipients of the EU's support to civil society, while support to other types of civil society actors is minimal. Despite the fact that the EU-accepted definition of civil society is fairly wide, the EU seems to be most comfortable in supporting civil society organisations in their efforts to become professionalised and adequate partners of government in policy making and as a watchdog function. There is a limited number of projects that engage in social dialogue or that support other types of civil society actors, particularly through traditional mechanisms such as CSF or EIDHR. This is a relevant factor when assessing effectiveness: effects on civil society organisations, particularly those based in or operating from capitals have been significant and positive in all countries. However, less effectiveness is recorded when it comes to grassroots organisations and other actors. Evaluation found an overall positive assessment of effectiveness, particularly in terms of the ability of CSOs to provide more quality inputs in policy processes, both at the local and national levels. Evidence collected within the scope of this evaluation confirms the finding of the Mid-Term Evaluation of CSF, which notes that “*differences exist between centrally based and those organisations outside of capitals (grassroots organisations)*”⁷⁷. A particular shift has been noted in the support to networking among civil society organisations, which has brought about positive results in the engagement in policy dialogue, while at the same time offering

⁷⁷ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey. 26

space for peer learning and exchange⁷⁸. A caveat exists in the internal organisation of networks in some cases depending on the openness and inclusiveness of network leaders (extent to which network leader actually shares information and includes the network members outside capitals).⁷⁹ All sampled projects provide a view of results (to be) achieved in terms of enhanced capacities of organisations and their constituencies and improved practices thanks to project interventions.

Effectiveness with regards to government recognition of the role of civil society and mechanisms for cooperation

The main effectiveness driver has been the readiness of the EU to invest in political dialogue (and pressure) with the government in combination with targeted financial support to both governments (through Technical Assistance projects) and civil society (through a variety of support modalities). Over the reference period of this evaluation, there have been steps forward in ensuring an enabling environment for civil society, though variations exist between countries, depending on political and also capacity contexts of individual governments. For example, during the period of 2007-2018 strong shifts in enabling environment for civil society have been noted in each country in the Enlargement region. A major shift was noted in Turkey, a country which has faced significant shrinking space for civil society throughout the reference period of this evaluation culminating in 2016 following the attempted coup. Negative trends were also noted in Serbia, Albania and the Republic of North Macedonia (though slight increase is noted with the new government in the Republic of North Macedonia as of 2017). During the reference period of this evaluation, Offices or units for cooperation with civil society have been established and mechanisms for consultation have been put in place (e.g. in Serbia, Montenegro, Bosnia and Herzegovina, Albania), with varying degree of effectiveness. The Mid-Term Evaluation of CSF found that the effectiveness of support to governments *“has been variable, mainly due to factors beyond the control of TA projects. These variables are linked to turnover of staff, political factors and the absorption capacity of government institutions to take in the tools and knowledge provided”*⁸⁰

Judgement Criterion 3.1: The effects achieved through the targeted support to civil society have corresponded to the EU’s initial objectives in the Enlargement region.

There is ample evidence that the implementation of targeted support to civil society has corresponded to the EU’s initial objectives in the Enlargement region. The effects are visible in several areas, primarily in terms of strengthening of CSO institutional capacities, developing CSO advocacy roles, dialogue between government and CSOs in policy making, and towards strengthening enabling environment for civil society; as well as encouraging CSOs to play a role in the adoption and implementation of the EU acquis in policy areas where they have an important implementation or advocacy role.

For instance, EU’s role was critical to those organisations benefiting directly from or implementing EU projects, by increased their capacities in terms of project management and strategic planning or empowering them to engage more proactively in various community processes. The increasing focus on grass roots and organisations outside capitals is enabling more fair distribution of capacities across countries, despite the fact that the strongest power still remains in capitals (or in Turkey in Ankara and Istanbul). Although there is a lack of ROM report for majority of sampled projects, some positive aspects of effectiveness have been provided by those available, though the overall effectiveness ratings vary. For instance, ROM reports show that activities and outputs contributed to the achievement of results. However, one of the sampled projects⁸¹ had a rather negative ROM ratings for effectiveness, due to contextual and political problems. Findings of this ROM were also confirmed by this evaluation. Main challenges as noted in Project reports to achievement of results of advocacy, were found to be lack of political will or financial means.

EU was very vocal in its aim to support government efforts to enhance enabling environment with CSOs. This included development of units and mechanisms for cooperation with civil society, policy dialogue towards increasing transparency and access to government fund for CSOs, etc. Review of the EU Progress/ Country reports, and EU Progress Reports on Civil Society across the region show some positive shifts, and a steady cooperation between civil society and authorities at

⁷⁸ Centre for Promotion of Civil society and TACSO (2012); Assessment Report on advocacy capacity of membership based CSOs in Bosnia and Herzegovina; <http://civilnodrustvo.ba/media/26121/assessment-report-on-advocacy-capacity-of-membership-based-csos-in-bosnia-and-herzegovina-2012.pdf>

⁷⁹ European Commission (2015); Impact Assessment of IPA 2012 Grant Scheme for Supporting Issue-based Networks in Bosnia and Herzegovina; https://europa.ba/wp-content/uploads/2016/12/Complete-Final-Report_Impact-assessment-of-IPA-2012-grant-scheme_NGO-networks_November-2016.pdf

⁸⁰ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey,

⁸¹ Project Capacity building for engagement of government officials in policy dialogue in Bosnia and Herzegovina

national and local level. The only exception is Turkey, which faces ever-stronger repression of civil society and challenges in work of the civil society actors. One of the challenges affecting the quality and occurrence of government-civil society dialogue is lack of professionalised organisations within many sectors, as also confirmed by this evaluation.

Indicator 3.1a	Aggregate achievement of short-/mid-term results within targeted support
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Document review and stakeholder interviews offer evidence of the achievement of results of individual projects, particularly when it comes to the increase of civil society organisations' capacities and professionalisation of civil society actors in different sectors, thus improving the quality of inputs in the policy making processes. However, this evaluation could not establish conclusive evidence or insight into aggregate achievement of results when it comes to other types of civil society actors. This is mainly due to the fact that the EU support to other types of civil society actors was not systematic.

The below analysis is organised by EU's initial objectives for targeted support in the Enlargement region (in bold below):

Developing CSO capacities

Document review and stakeholder interviews emphasise that EU support (through all instruments, including CSF, EIDHR and support to IPA Components (e.g. IPA TAIB, CBC), has been a very positive driver for those organisations which had a chance to benefit directly from or implement EU projects to increase their capacities in terms of project management and strategic planning, empowering them also to engage more proactively in different community processes. Available assessments of Civil society (e.g. TACSO Needs assessment reports) and stakeholder interviews confirm that variations exist between organisations in the centres (capitals) and elsewhere, with widening gap between them in terms of access to funds and sustainability. The EU changing orientation to ensuring grants reach out to smaller organisations (e.g. EIDHR introduction of different LOTs, CSF sub-granting) has been a positive driver. Besides, TA projects (such as TACSO) had strong focus on capacity building of grassroots organisations, which was a positive input in this regard. Documents and stakeholder interviews emphasise that CSOs face issues with financial sustainability and donor-driven approaches, staff turnover and generally weak (financial or policy) support from national/local governments (See CSO sustainability index overview in Sub-Annex 1 Table 2).

At the level of projects, a review of sampled projects notes positive effects mainly relating to increased CSO institutional and advocacy capacity (i.e. improved CSO management; CSO ability to advocate and perform watch dog function, etc.) and creating conditions for CSOs to engage more proactively into decision making processes. Such examples are for example visible in 3 out of 5 projects in Albania, namely: 1) Civil society in action for protection of child rights; 2) Youth Participation for Enhanced Democratisation of Society; 3) Economic and Social Empowerment for Roma and Egyptians - a booster for social inclusion (ESERE).

In Bosnia and Hercegovina such examples are provided within 5 out of 6 projects: 1) BASE – Building Accountability and Systems in the Elections; 2) Capacity building government officials to engage in policy dialogue with CSOs; 3) Integrating European standards regarding freedom of expression and decreasing pressure on journalists in Bosnia and Herzegovina via transparency of media ownership and criteria-based budgetary financing"; 4) Civil society in action for dialogue and partnerships - "Support to issue based NGO networks and 5) Strengthening the first watch dog function related to public procurement "TENDER implementor.⁸²

Generally, due to lack of ROM reports for the majority of projects and limited field coverage it was challenging to assess the effectiveness of each individual project. However, in addition to above mentioned projects, some positive aspects on effectiveness have been provided by available ROM reports and stakeholder interviews for two projects, *Capacity building government officials to engage in policy dialogue with CSOs* and BASE Project. ROM for Base project provided the assessment on effectiveness to date stipulating that it was evident that all activities and outputs are contributing to the achievement of results. For instance, the seminars and working

groups are raising awareness among civil servants in all governments in terms of the importance of dialogue with civil society and mechanisms for this cooperation, both existing and possible. The ROM report noted that Media coverage was contributing to the public awareness of all topics where this cooperation is necessary for achieving desired results. Web platforms were designed to bring public policies closer to citizens in all stages of their development. Finally, the ROM report noted that empowering CSOs through capacity building contributed to greater social cohesion, as also confirmed by stakeholder interviews.

On the other hand, the findings of the ROM mission that the project *Capacity building government officials to engage in policy dialogue with CSOs project* was not perceived as being effective were confirmed by this evaluation. The ROM report noted that, although from the very beginning the project had offered full access to all target groups and established contacts with numerous stakeholders, it did not yet achieve all that was planned. The involvement of the Federation Bosnia and Herzegovina Government was assessed as not yet fully satisfactory. This was an issue that occurred from the start as it was difficult to get the Government's representatives on board. Upon intervention by the EUD the situation somewhat improved and the focal point was defined and involved in the project implementation, but this is now on hold due to the change of government resulting from the recent elections. Additional efforts of the Contractor will be required to follow this up with the Federation Bosnia and Herzegovina Government.

In Serbia, ROM for *Support for Media Capacity in the Area of EU Integration project* provided valuable insight in terms of effectiveness stating that the project was designed to provide a coherent and coordinated response for public information, while at the same time empowering the media through the media financing, media management, journalism training, and comprehensive media research. Full measuring of OVIs upon the project end shows that the partnership relations developed with project partners and beneficiaries are very effective and the continuation of benefits for the Serbian media has been preserved in the post-intervention phase.⁸³

In Kosovo* one targeted support project was subject to ROM mission, namely *Return and Reintegration project*, receiving positive effectiveness assessment.⁸⁴

On the other hand, in the Republic of North Macedonia and Turkey, no ROM reports have been available for any of the reviewed projects so further insight into effectiveness was difficult. In Albania and Montenegro, no sampled projects with targeted support were ROMed.

Developing CSO advocacy roles

EU support (through all instruments, including IPA (e.g. CBC), CSF, EIDHR) has been instrumental to increase CSO advocacy role regarding issues of their concern. There is an ever-increasing number of topics and issues that are being raised by civil society in a number of areas across the region (e.g. environment and climate change, position and access to rights of vulnerable groups, social and political issues). Civil society organisations are becoming more vocal advocates on various issues, and the EU support is important part in empowering the organisations to undertake that role. Review of sampled projects shows that projects have had various approaches to advocacy (that also included trainings for advocacy or wide dissemination of research studies conducted as an advocacy tool). For example, projects focusing on minorities (e.g. Roma) usually have strong advocacy components. In other areas, advocacy is conducted for thematic issues, albeit with varying impacts on changing the status of such thematic area. The reasons mentioned in final reports for many CSO projects include most consistently the lack of political will to make such changes, or lack of financing for introduction of respective measures that are beyond control of civil society, which is also confirmed through stakeholder interviews. For example, the Project *"Integrating European standards regarding freedom of expression and decreasing pressure on journalists in Bosnia and Herzegovina via transparency of media ownership and criteria-based budgetary financing"* implemented in a consortium of organisations had a strong advocacy component for Law on media ownership transparency and revision of the existing legislation on public financing of media in accordance with the EU standards and requirements. However, despite the Project's efforts, the laws were not adopted. Two projects in Kosovo* (Project *"Support to Social dialogue through capacity building and reorganisation of the social partners"* and *"Return and Reintegration in Kosovo"*) had strong advocacy components. The Project for social dialogue resulted in creation of an online platform, resulting in maintaining an online presence for social dialogue and social partners, measures that boosted advocacy and outreach. The Project dealing with

⁸³ Project received all A marks on effectiveness in monitoring report.

⁸⁴ Project received B on effectiveness in monitoring report.

return had advocacy component with results in raised awareness on return issues. The Montenegrin Project “CSOs for Making Local Democracy Work” conducted research to identify practices and procedures on public funds distribution on local level. The research results were disseminated as advocacy tool for adoption of recommendation and creating enabling and transparent financial environment for CSOs. The results of the advocacy could not be established through this evaluation due to limited field scope.

Dialogue between government and CSOs

The two streams of EU engagement were towards 1) civil society and 2) government. A number of TA projects were implemented in the countries in the region with the aim to support government efforts to enhance enabling environment with CSOs. Support included development of units and mechanisms for cooperation with civil society, policy dialogue towards increasing transparency and access to government funds for CSOs, and also legislative/policy solutions for institutionalisation of engagement with civil society. Results in this area vary and different consulted documentary sources and stakeholders refer to ongoing gaps or reversals in this dialogue, for many reasons, including political, administrative, etc. In some individual cases, some good practices remain. For example, the Impact Assessment of EU support to networks in Bosnia and Herzegovina found that *“CSF encouraged the new perspective of dialogue and cooperation between CSO networks and governmental institutions. Through this process, the funded networks were profiled and mostly consolidated allowing them to continue with enhancing the constructive dialogue and collaboration with public authorities. This type of an assertive dialogue has been proven to be fruitful as well as having the potential to be effective and impact-oriented”*⁸⁵ However, stakeholder interviews emphasise that the networks are still in many cases weak and fluid, with varying level of sustainability. Review of EU progress /country reports produced between 2007-2018 show some positive shifts. The analysis of the EU Progress Reports on Civil Society Organisations for the region of Western Balkans and Turkey for years 2007, 2010, 2013 and 2018 showed similar tendencies across the region. The only evident exception is Turkey, where political events across the state created negative trend in stability and development of civic society. All reports include certain aspects of civil society cooperation with state authorities and participation in policy-making process and funding of civil society organisations, while several reports analysed the aspects such as organisational and managerial capacity or advocacy skills of civil society. A steady progress in cooperation between civil society and official authorities, whether on state or local level, has been recorded across the region. Improvement started mostly in 2010 or between 2010 and 2013, with the exception of the Republic of North Macedonia and Montenegro where the situation has been marked as satisfactory already in 2007. This positive trend continued in 2018, apart from Turkey, which experienced negative trend and deterioration of civil society. Each country institutionalised inclusion of civil society through different legal instruments, but they all mark a lack of proper or complete utilisation of these instruments and, therefore a lack of successful involvement of civil society. Progress Reports target especially their participation in policy-making process, which was indeed improved, but even in 2018 mostly remained on an ad hoc basis, as i.e. in Kosovo*.⁸⁶ In Turkey, media and journalists related projects usually have strong advocacy component, albeit with various results. Most results at the level of projects, as reported in final or ROM reports are linked to raised awareness or recognition of issues in respective areas of work of funded civil society entities.

Encouraging CSOs to play an increasing part in the adoption and implementation of the EU acquis in policy areas where they have an important implementation or advocacy role

Document review and stakeholder interviews confirm that CSOs are also a more active and vocal partner of the government in the issues relating to adoption and implementation of the EU acquis. The EU, but also government, invest efforts to ensure systematic consultations with civil society in programming of assistance but also in issues relating to aligning with the EU acquis. For example, in Serbia the SECO mechanism has been a very effective way of ensuring CSO participation in sectoral planning. In Bosnia, an online platform for consultations has been established through an EU TA project. In Montenegro, Kosovo, the Republic of North Macedonia and Albania, civil society actively engages in consultations, though variations exist. In Turkey, civil society is a partner of the EU in all areas of its work. However, there is one important challenge that is found in the assessments and also confirmed through stakeholder interviews – there are not so many professionalised organisations within many sectors (particularly relating to EU acquis areas) so it is hard to find a civil society partner for dialogue in many sectors. This is an area for

⁸⁵ European Commission (2015); Impact Assessment of IPA 2012 Grant Scheme for Supporting Issue-based Networks in Bosnia and Herzegovina; p. 8 https://europa.ba/wp-content/uploads/2016/12/Complete-Final-Report_Impact-assessment-of-IPA-2012-grant-scheme_NGO-networks_November-2016.pdf

⁸⁶ EU Progress reports 2007-2010-2013-2018

further investment that depends also on the factors such as financial sustainability. Financial sustainability would have allowed organisations to build their portfolio without fear of turnover of staff or discontinuation of funds.

Judgement Criterion 3.2: The effects achieved through the mainstreamed support to civil society have corresponded to the EU's initial objectives in the Enlargement region.

Although the EU has recognised the need for mainstreaming civil society in the Guidelines for EU Support to Civil Society in Enlargement Countries (2014-2020), actual mainstreaming is still not systematic. Not only there is a different understanding of mainstreaming by different actors, but also the inclusion of CSOs within sector support and support to CSOs' actions takes different shapes in different sectors. This evaluation found the most effective integration is within the Public Finance Management and Public Administration Reform sector, while in sectors such as education, social policy or environment results are achieved predominantly in terms of raising public awareness on issues, monitoring policies, etc.

The main results, as evidenced by stakeholder interviews and document sources, are found in interlinkages between results achieved by targeted and mainstreamed support. Namely, results achieved through targeted support, particularly in terms of increased CSO institutional and sectoral capacities and knowledge, have their positive implications in achievement of the results within mainstreamed support. Stakeholders emphasise that the organisations which received ongoing targeted support through EU (and also other donors) have increased their institutional capacities, raised profile in their respective sectors which helped them become credible actors in various processes within given sectors. Results are also seen in terms of increased capacity of CSOs to take a more active watchdog role and to engage in monitoring of sectoral reforms. However, results of mainstreamed support (through sector contracts, budgets) were not evidenced by this evaluation.

Indicator 3.2a	Sectoral achievement of short-/mid-term results within mainstreamed support
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Document review and interviews with key informants from the EUDs and other actors point to the fact that mainstreaming as a declarative intention of the EU is there, but actual mainstreaming is not happening systematically. Document review and interviews also reveal that mainstreaming is understood differently by different actors: all interviewed actors understand mainstreaming as ensuring that CSOs are consulted in programming of sectoral programmes but, when it comes to integration of CSO activity within sectoral interventions, this is not consistently the case across the EUDs in Enlargement region. This results in the rather erratic inclusion of CSOs and CSO interventions within different sectors. The review of available documentation, such as project reports of mainstream interventions shows that most effective integration is within the Public Finance Management and Public Administration Reform sector, though this was not confirmed during the field phase. In these sectors, there are examples of CSOs' monitoring efforts of implementation of PFM and PAR reforms, particularly corruption. For example, projects in Bosnia and Herzegovina, Montenegro, Albania and Serbia, but also regional projects implemented in the area of monitoring public policies and anti-corruption brought significant results in terms of investigating and reporting corruption. Document review and stakeholder interviews note that these interventions helped raise awareness on corruptive activities of governments. In other sectors, such as education, social policy or environment, there were good results achieved by CSOs, mainly in the area of raising public awareness on issues, monitoring policies and also in the field of social inclusion, provision of social services. For example, CSOs in Montenegro are engaged in the sector discussions on social policies. In Turkey, document review of a sampled project in the field of environment did not provide any insight in engagement with civil society or results.

Evaluation found interlinkages between results achieved by targeted support and those achieved within mainstreamed support. Most CSO partners selected to contribute to sectoral issues are those that have been long-term partners of EUD and/or beneficiaries of EU targeted support throughout the years. In other words, results achieved through targeted support have their positive implications in achievement of results within mainstreamed support. It is evident that EUDs invest significant efforts in ensuring consultations with civil society in programming of assistance in different sectors, particularly the sector budget support that is an increasingly important modality of support. The EU organises pre-consultations with civil society ahead of Special Group meetings (e.g. in Albania, Montenegro, Kosovo*, Serbia, the Republic of North Macedonia ahead PAR Special Groups). An example of sectoral achievement within mainstream support is a SECO mechanism in Serbia. SECO represents a

consultation mechanism elaborated at the Serbian European Integration Office (SEIO), aiming at enabling the civil society organisations to participate in programming and monitoring of EU funds and other international development assistance. In February 2011, six SECOs were selected to facilitate the CSOs participation in development assistance planning in the sectors of Rule of Law, Public Administration Reform, Civil Society, Media and Culture, Human Resource Development, Agriculture and Rural Development and Environment and Energy. At the time of the evaluation, this mechanism is no longer in use.

However, the Evaluation of Sector approach under IPA II found that *“IPA II placed great importance on civil society’s involvement in sector approach processes. In practice, civil society organisations were engaged in sector approach forums such as sector working groups and sector monitoring committees only formally, but the quality of their engagement was generally poor. As a result, these organisations (with few exceptions) were sceptical of the sector approach as an effective vehicle for integrating their views into programming and perceived their own participation in its forums as having little value to them”*⁸⁷.

CSOs have also been encouraged and supported to take a more active watchdog role, monitoring reforms within various sectors. For example, a network of organisations received support from EU in Bosnia and Herzegovina to monitor anti-corruption measures. The Mid-Term Evaluation also notes that, for example, “support to the projects KULT⁸⁸,⁸⁹ and Nasa Djeca⁹⁰ (“Our Children”)⁹¹ in Bosnia and Herzegovina, and of the Network 23⁹² in the Republic of North Macedonia, had strong components of policy-making and monitoring of implementation of relevant policies, which were effectively implemented”.

Indicator 3.2b	Extent to which the EU strategic approach and related guidelines and tools to deal with CS mainstreaming were appropriate.
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As discussed above, the EU organises extensive consultations and also financial support to civil society particularly towards strengthening their role in provision of inputs and monitoring sector reform processes. The approach is appropriate, but there is still a lack of more mainstreaming of civil society throughout the actual sector assistance, particularly giving CSOs more prominent role in sector budget support. For example, while CSOs are increasingly recognised as service providers in some areas (e.g. social services), there is no recognition of the role of civil society in providing services in other sectors. The evaluation found interesting differences between sectoral interventions: sectoral projects in the areas of PAR, education, social development and to some extent rule of law do include civil society, albeit to various extents. For example, a significant role is visible in social development, education, PAR projects, whereby civil society is either integrated (e.g. PAR sector budget support in Serbia integrated civil society in its results) or included as providers of services (e.g. social services in education and social welfare). The Thematic evaluation on competitiveness found the “[c]ontribution of the civil society actors already actively involved in a number of advocacy and awareness building activities related to PAR and structured in a number of EU-funded regional (multi- country) IPA networks”⁹³. The evaluation recommended more engagement with civil society in economic governance, noting also that “civil society should be consulted in measuring the completion of specific conditionalities.”⁹⁴ On the other hand, in sectors such as environment, competitiveness, agriculture, the role of CSOs is very vague and in many cases civil society is mentioned in DOAs but not in the progress/final reports. Interestingly, review of the Energy project in Turkey indicated that final beneficiaries were CSOs, but the final report noted that NGOs went to study visits on their own expense, and not covered by the Project.

The Guidelines for EU Support to Civil Society in Enlargement Countries (2014-2020) promote civil society involvement in identification, planning implementation and monitoring of IPA II support across all sectors. As such, Guidelines provide for framework for mainstreaming of civil society. However, this evaluation found no elaborated tools to deal with CS mainstreaming except consultations with civil society in programming or Special Groups. Evaluation of Sector approach under IPA II found that *“IPA II placed great importance on civil society’s involvement in sector approach processes. In practice, civil society organisations were engaged in sector approach*

⁸⁷ European Commission (2018); Evaluation of Sector approach under IPA II; p. 26 http://edz.bib.uni-mannheim.de/daten/edz-k/gde/18/SA_IPA_II_eval_Vol_1_final_on_19_March.pdf

⁸⁸ Contract number: 310583

⁸⁹ <http://www.mladi.org/index.php?lang=en>

⁹⁰ Contract number: 310808

⁹¹ <http://nasadjeca.ba>

⁹² Contract number: 333780

⁹³ European Commission (2017); Thematic evaluation on Support to Economic Governance in Enlargement and Neighbourhood Countries, p. 269

⁹⁴ Ibid, 267

forums such as sector working groups and sector monitoring committees only formally, but the quality of their engagement was generally poor. As a result, these organisations (with few exceptions) were sceptical of the sector approach as an effective vehicle for integrating their views into programming and perceived their own participation in its forums as having little value to them”⁹⁵. Further, the evaluation concluded that “The two main priorities of the Guidelines for EU support to civil society in enlargement candidates and potential candidates 2014-2020 were only partially implemented: Building a conducive environment for CSOs’ existence and participation was not pursued by the governments and was not supported by IPA as a key crosscutting issue. CSOs’ participation relied on specific mechanisms led by NIPAC (especially for participation in IPA programming) and provisions/institutional arrangements linked to specific IPA supported programmes; Building the capacities of the Civil Society was better addressed by IPA through specialised facilities, tools and instruments (including CSO Facility, EIDHR, CSOs foundations, and specialised funds). Some of these were instead managed by the governments, thus running the risk of compromising the independence of the CSOs, which in some countries may be detrimental. In most beneficiary contexts, CSOs were not involved in assessments of the results or reviews of effectiveness and among them, a sentiment of dissatisfaction prevailed”⁹⁶. This is an important shortcoming that affects more clear understanding of what mainstream support actually means and how it should be implemented and to what results.

Judgement Criterion 3.3: The effects achieved through policy-level engagement with civil society have corresponded to the EU’s initial objectives in the Enlargement region.

The policy-level engagement of the EU with the civil society in the Enlargement region is continues and is a driver of more enabling environment for civil society as emphasises by stakeholders interviewed within the scope of this evaluation. However, there are is documentary evidence on actual EU efforts or their results, which is a shortcoming as it does not allow systematic understanding of results beyond anecdotal level. One of the examples of the role and leverage EU has had for the strengthening and empowerment of the Civil society is the Berlin process. Within the overall framework of the berlin process, Civil Society Forum of the Western Balkans was organised enabling inclusion of civil society in public debates on the importance of the EU integration and the role of civil society in it.

Tukey received an ongoing policy support to civil society and dialogue with government on issues of civil society. However, the success of the policy dialogue has been reversed by complex political situation and shrinking civil society space in the country.

⁹⁵ European Commission (2018); Evaluation of Sector approach under IPA II; p. 26 http://edz.bib.uni-mannheim.de/daten/edz-k/gde/18/SA_IPA_II_eval_Vol_1_final_on_19_March.pdf

⁹⁶ Ibid, p. 47

Indicator 3.3a	Aggregate achievement of short-/mid-term results within policy-level engagement
<p>The EU's endorsement of civil society and support throughout the years of EU engagement in the Enlargement region combined with targeted support has been strong leverage and empowerment for civil society to take more active role. For example, the Berlin Process has engaged civil society very prominently within the scope of the Civil Society Forum of the Western Balkans, as the main platform for the inclusion of civil society in the Berlin process. The forum contributed to the Berlin Process through policy recommendations and the Forum's policy briefs and studies, prepared at annual, interim and working groups meetings, in online consultations and at joint sessions with officials of the governments involved in this process. Furthermore, the civil society part of the Berlin process has been actively engaged in public debates on the importance of the EU integration and the crucial role that civil society has to play in it, both in the WB6 countries as well as in the EU. The Final Declarations of the Berlin Process annual summits of heads of states underlined the role of civil society for democratisation and EU integration. Furthermore, it managed to raise awareness of importance of civil society in all decision-making processes relating to EU integration⁹⁷.</p> <p>In Turkey, the EU has offered ongoing policy support to civil society and dialogue with government on issues of civil society. Documentary review shows strong and ongoing policy support to civil society, particularly human rights defenders and media. The success of this policy dialogue has been highly affected by political sensitivities in the country, particularly after the coup in 2016.</p> <p>Across the board in enlargement candidates and potential candidates, there is unsystematic and rather erratic documentary record of policy support. The main and most consistent vehicle in terms of documentary records for such support are the EU progress reports (now called country reports). However, there are no systematic records of EUDs' policy dialogue measures (e.g. meetings to discuss civil society, open or protest letters or other events). This lack of documentary evidence makes analysis difficult particularly from the point of view of the extent to which such support was a contributory factor in changing the role of civil society but also democratisation of the countries in the region within the given contexts. Stakeholder interviews emphasise the fact that the EU's most important results from policy dialogue are visible in the manner in which the government recognises and engages with civil society. Positive steps have been noted as a result of EU's insistence in engaging civil society. Stakeholders emphasise that without EU support, civil society would not be engaged so deeply in some reform processes.</p>	

EQ4 (Impact): To what extent have the EU's various forms of engagement with civil society in the Enlargement region contributed to the enhancement of participatory and inclusive democratic governance?

The EU membership perspective has been considered the strongest external driver of domestic political change in the countries of the Western Balkans and to some extent Turkey. Document review and stakeholder interviews provide evidence that EU's engagement with Civil Society in the region contributed the enhancement of participatory and inclusive democratic governance. This is visible through several aspects of Civil Society's activities such as its increased role and recognition by the government as an important partner for dialogues and consultations. Re-orientation towards more sectorial approach is a driver for better cooperation between CS and government, though it is not fully utilised by EU and national counterparts to satisfactory extent. These EU efforts and improvements have been confirmed across the region, with the variation. Progress in cooperation with government and participation in policy-making is visible across the region. The inclusion of CSOs has been mostly ensured through the establishment of a legal framework, although it has been rarely fully implemented. CSOs became noticeably more involved in the legislative process as well as in EU access negotiations, therefore it can be said that their role as an actor in political life has been recognised. For example, in the period between 2007 and 2018 Bosnia and Herzegovina marked a tangible progress (but still remained the only country in the region without continuously adopted Strategies for cooperation with civil society), Albania, Northern Republic of Macedonia and Kosovo record mostly slow but tangible progress concerning the involvement of CS in legislative process, while in 2018 Serbia still did not mark progress in systemic cooperation between government and civil society. However, the EU's efforts materialised differently at the national and local level, as only central government managed to establish and apply consultation mechanisms and systematically include civil society in decision-making process.

⁹⁷ See <https://wb-csf.eu> for a comprehensive overview about all past activities and achievements of the CSF WB.

In the period between 2016 to 2017, CSO Sustainability index remained largely stable with sustainability ranging from 3.7 for Albania and Bosnia, to 4.1 for Serbia. While CSOs in all countries lack strategic planning and implementation of their own missions and have made no progress, Northern Macedonia distinguished itself as it recorded progress in strategic planning, due to donor-supported programs. The internal management system in all countries of the region has been only formally implemented, while in practice there is no genuine division of responsibilities between governance and management leaders. No progress has been marked here whatsoever. The only exception is Albania, where an improvement came as a result of an incremental change since 2008 and it contributed improvement in overall sustainability in the country. Over almost a decade, number of CSOs in Albania providing services to their constituencies has increased and the state has increasingly recognised the role of civil society in providing services.

Financial viability of civil society remains overall weak, but across countries, progress is still maintained. Reasons for slow progress lay in the fact that the governments across the region, do not provide for full transparency in public funding, monitoring, evaluation or sustainable financial resources for civil society organisations. In Kosovo, for example, even though the government published a first-ever report on public funding in 2017, a type of information it provided did not allow for a meaningful analysis of the budget. In the period between 2003-2015, Turkey saw a positive trend in the development of CSOs, managing to strengthen CSO cooperation with government and participating in policy shaping. Nevertheless, financial aspect was hampered by Turkish legislative and bureaucratic obstacles and a lack of transparent mechanisms for public funding throughout the years. Facing the same obstacles as a whole region, Turkey did not manage to ensure financial stability. The situation deteriorated remarkably post Gezi protests, when CSOs across the country experienced increasing pressures, following the high number of detentions and arrests of civil society activists and human rights defenders.

Public perception of CSOs has been uneven across the region. While most of the countries record an increase of public trust in CSOs, Northern Macedonia deviates significantly. Due to the “de-Sorosisation” campaign launched at the very end of 2016 by the government then in power, public image of CSOs deteriorated significantly. In addition, public perception of CSOs in Bosnia and Herzegovina is still often considered as rather negative.

Judgement Criterion 4.1: EU’s engagement with civil society has contributed to the increased capacity of civil society organisations and actors to perform their roles as independent development actors in the Enlargement region.

EU support to the Enlargement candidates and potential candidates has been distributed through three types of support- targeted support, mainstream support and policy level engagement. A combination of targeted and policy support contributed to positive impacts for civil society across the board of enlargement candidates and potential candidates. Civil society is more engaged in policymaking processes, with increasing quality of inputs and insights thanks to improved organisational capacities and advocacy and watchdog roles. It is evident that across the region governments are more aware and perceptive of the need to engage civil society in the policy making process. However, sustainability of achieved results is hampered by political factors, such as slow EU integration and shrinking space for civil society in some countries (e.g. Turkey and to extent in Serbia); but also challenges for civil society, primarily donor driven orientation and lack of sustainability.

Evaluation found positive trends in the ways civil society operates and is recognised by governments. Looking back at the period between 2007 and 2018, Bosnia and Herzegovina has marked a tangible progress, such as creation of e-consultation web platforms developed in order to ensure a dialogue and cooperation with CSO. However, Bosnia remains the only country in the region that has not continuously adopted Strategies for cooperation with civil society. Also, Albania, Northern Republic of Macedonia and Kosovo have experienced mostly slow but tangible progress concerning the involvement of CS in legislative process. In Serbia in 2018 there was still no progress in systemic cooperation between government and civil society. Due to its specific political situation, Turkey comes as an exception in the overall picture of CS in the Enlargement region, as its positive trend that country marked between 2007 and 2013 was reversed in 2013 with the Gezi Protest and ensuing political complexities.

This evaluation found no evidence of long-term results of mainstreamed support. Civil society has been engaged in programming of IPA support, and their engagement is viewed by this evaluation as cumulative result of ongoing EU support to professionalisation and organisational development of civil society organisations. However, available documentation and stakeholder interviews reveal that there has been no further structured engagement with civil society within mainstreamed support, which naturally yields no results.

Indicator 4.1a	Aggregate achievement of long-term results delivered through targeted support
	<p>As discussed above, targeted support was provided in different streams such as: developing CSO organisational capacities; developing CSO advocacy roles; enhancing dialogue between government and CSOs and encouraging CSOs to play an increasing part in the adoption and implementation of the EU acquis in policy areas where they have an important implementation or advocacy role. Available studies (e.g. consecutive TACSO Needs Assessment reports for each country in the region, CSO Sustainability index, EU, government and civil society authored publications) and stakeholder interviews indicate positive trends and changes in the ways that civil society operates and is recognised by governments across the board of enlargement candidates and potential candidates. For example, comparative analysis of contributions to EU progress reports from 2007 and from 2018 (Country report) show that civil society is contributing more substantially to the contents of these reports. Comparative analysis of these reports also shows that the needs and issues of civil society have changed with changes also happening in the ways governments deal with civil society. Comparative analysis of EU progress reports from 2007 to 2018 show that civil society in Western Balkans countries has generally seen positive changes in the way government mechanisms for cooperation with civil society are organised. Western Balkans countries, with the exception of Bosnia have continuously adopted Strategies for cooperation with civil society. The civil society is also engaged in policy making at different levels, albeit to different degrees. Comparative analysis of EU progress reports for Turkey, on the other hand, shows negative trends particularly post 2016. Detailed findings of the comparative analysis of EU progress reports per country are as follows:</p> <ul style="list-style-type: none"> • In Bosnia and Herzegovina, the EU progress report from 2007 has minimal mention of civil society, noting that the Council of Ministers signed an agreement on cooperation with the non-government sector and appointed a senior programming officer. Civil society organisations continue to register mainly at Entity level, because the registration process at State level is perceived as more bureaucratic⁹⁸. Cooperation between Civil Society Organisations and the state authorities in Bosnia has been improved in 2013 but it was still lacking an institutional framework to ensure a sustainability of their cooperation. After several attempts to institutionalise cooperation between government and civil society organisations on a state level (such one was a failed 2007 Agreement on cooperation with non-government sector), only in 2017 a certain progress has been recorded as a Charter on Cooperation between Council of Ministers of Bosnia and Herzegovina and CSOs was signed⁹⁹. The 2017 EU Progress report noted creation of e-consultation web platforms as concrete institutional mechanisms developed to ensure a dialogue and cooperation with CSO. Transparency in allocation of funds for civil society organisations has been somehow improved, as public funding calls and, in some cases, results of selections were publicly available, but also in 2018 it remained weak due to lack of monitoring and evaluation. A review of the EU progress report did not result in any records on changes or trends in terms of CSO organisational capacities, advocacy skills or civic engagement of Bosnian public. • Role of Civil society organisation in Serbia, in terms of its importance, has not changed throughout the period from 2007 to 2018. Review of EU progress reports across the reference period of the evaluation show that the enabling environment for civil society became more institutionalised in 2010 through establishment of an Office for Cooperation with Civil Society. It should enable a progress in cooperation between government and civil society as well as a progress in financing of civil society. In 2013, the Office produced its first annual report on budget spending on associations and other civil society organisations. Still, in 2018, no progress has been marked as no systematic cooperation between government and civil society is ensured. In the area of funding of civil society, in 2018 amendments to the regulation on public funding to CSOs were adopted, aiming to increase transparency, monitoring and evaluation on the overall process. However, most CSOs still lack sustainable financial resources. Aspects such as organisational capacity, advocacy skills or civic engagement of Serbian public has not been included in the reports. • In Albania, the period between 2010 and 2013 marks a tangible progress in involvement of CSOs in legislative process. This progress has been further continued in 2018, when consultations of civil society in legislative and executive process increased again. What remains vulnerable is the development of a systematic and transparent framework of their inclusion in these processes. A certain progress in cooperation between government and civil society has been made by the Law on Public Consultation brought in 2014. Still, consecutive reports marked no proper implementation due to several impediments such as high financial cost

⁹⁸ European Commission (2007); EU Progress report: Bosnia and Herzegovina 2007

⁹⁹ European Commission (2007); EU Progress report: Bosnia and Herzegovina 2017

of registration, lengthy procedures and lack of specialised judges. There has been no progress in terms of financial sustainability of civil society organisations. No progress has been marked in terms of organisational capacity and advocacy skills, which were rated poorly in 2007.

- Throughout a period from 2007 to 2013, as per a comparative review of EU Progress reports 2007-2013, the Republic of North Macedonia has marked a steady progress in the area of cooperation between the government and CSOs. Already in 2007, the country adopted a strategy and developed an action plan for cooperation with civil society, which continued to be implemented over the years. The 2013 noted that, under parliament's oversight system, civil society organisations and academia were consulted on six draft laws, in 14 public debates and in 2 oversight hearings. The 2017 report noted a good progress in involvement of civil society organisations in dialogue, policymaking and legislative processes. It is noticeable that, while the state level has proved certain progress, local government still lacks sufficient capacity to ensure standardised cooperation and financing of local civil society organisations. Nonetheless, improvement of legal, financial and policy frameworks on a state level is still needed in order to ensure a sustainability of the achieved progress. A step toward better cooperation between government and civil society has been done through an amendment of Decision for establishing the Council for cooperation between government and civil society. However, consecutive reports noted partial implementation of the strategy for civil society. Another issue that has been repeatedly noted was that civil society organisations remain heavily dependent on foreign funding and the lack of sufficient financial resources remains a serious constraint.
- In Montenegro, as of 2007, a framework for civil society organisations in Montenegro was marked as largely satisfactory and this trajectory has been continued throughout 2010 and 2013 as per review of EU progress reports. In 2017, it came to improvement of legal and institutional framework for cooperation between the government and CSOs, especially through development of a better legal basis for public funding of Civil Society Organisations. Over the years, representatives of Civil Society Organisations continue to be involved in the activities of state and local government. Their involvement in the accession negotiations have been acknowledged as important since 2013 and this practice is continued in 2018. Reports do not follow progress of organisational and managerial capacity of Civil Society Organisations, nor do they analyse the intensity of public civic engagement.
- In Kosovo*, the EU progress report from 2007 noted that Civil Society Organisations were mostly organised as small organisations, dependent on short-term funding from a single donor. They were divided along the ethnical line with no cooperation among ethnically different organisations. Organisational and managerial capacity were very uneven, especially at municipal level. Cooperation between Civil Society and government remains uneven. While, in the area of funding, 2010 did not bring any improvements, progress was visible in the area of inclusion of Civil Society in different areas of legislation. This indeed occurred only at the ad hoc basis. Review of EU progress reports shows that further cooperation has been continued in 2013 as public hearings and consultations became a frequent feature. The Assembly has also opened a position for an officer for relations with civil society and donor coordination. Representatives of Civil Society have continued to be part of the task forces on European integration and the National Council on European integration as well as one of the actors in development of government's strategy and action plan on cooperation with civil society for 2013-2017. However, cooperation between government and Civil Society was still rated as ad hoc. Line of a slow progress has been continued in 2018. A new draft law on freedom of association of NGOs was prepared in consultation with civil society but has yet to be adopted. Similar progress was made in the area of transparency of public funding, where in 2017 the government published the first ever report on public funding. However, some shortcomings need to be resolved first, to allow for a meaningful use of the report. Deterioration or progress in areas of organisational and managerial capacity has not been followed in the reports.
- In Turkey, the period between 2007 to 2013 marked a positive trend in civil society development. CSOs were participating in policy shaping, to a certain extent, and the overall cooperation between government and Civil Society Organisations was improving. Representatives of Civil Society were consulted on constitutional amendments as well as on the EU accession process. However, they were exposed to disproportionate administrative checks and fines, which in addition to several other disadvantages prevented a more stable environment for them. Gezi Protest in 2013 activated a Civil Society but also discovered its shortcomings. Civil Society was not seen as a legitimate stakeholder in democracy by the ones traditionally involved in politics. There are no legal guarantees for its involvement in policy-making; rather it was only on an ad hoc basis and often only in specific phase of policy design. Financial sustainability has been also hampered by legislative and bureaucratic obstacles, as there are no transparent mechanism for public funding and no appropriate fiscal incentives. Capabilities, visibility and general development of Civil Society were enhanced only through the EU-Turkey Civil Society Dialogue programmes. The year 2018 has been marked by serious backsliding regarding development of Civil Society. It experienced increasing pressures, following the high number of detentions and arrests of civil society activists and human rights defenders. As there is still no comprehensive government strategy to ensure cooperation with Civil Society, most of independent right-based NGOs are excluded from consultations as part of law and policy-making processes and monitoring.

Stakeholders interviewed within the scope of the evaluation confirm positive impacts of EU funds on the level of engagement of civil society and its empowerment, mainly resulting from support to CSO organisational capacities and CSO advocacy roles. Stakeholders from Bosnia and Herzegovina emphasise that EU has been a contributor to enhanced dialogue between government and CSOs, in particular contributing to opening the space to CSOs as a result of increased recognition of the role civil society plays in policy processes. In particular, positive outcomes have been noted in terms of improved participatory policy making thanks to EU supported mechanisms for consultations and investment in government's capacity to establish and utilise such mechanisms. The main hindering factor to the overall advancement of civil society is seen by stakeholders to be dependence of civil society organisations on external funding and project orientation. For instance, in Bosnia and Herzegovina, there are not so many professionalised organisations across thematic sectors, which affects the level and quality of dialogue.

At the level of projects, there is only fragmented evidence of impact, mostly at anecdotal level picked up through stakeholder interviews and available reports. This is mainly due to the fact that evaluations of sampled projects were not available and final reports did not offer insight into impacts of interventions, which is understandable from the point of view that impact materialises 3 to 5 years post implementation. Review of the limited number of available ROM reports, though, showed that out of universe of sampled projects, only 11 target and mainstream support projects have had ROM assessments. Two (out of 11) projects did not provide for any ratings. Review of ROM reports for target support assessments and rating on impact shows that 4 projects got B rating while only 2 projects got the rating A. The best project in terms of the impact and sustainability, but also overall having in mind that this is the only project that received all As, is "*Enhancement of Turkish Energy Sector in Line with the EU Energy Priorities and Strategies*" project. However, due to evaluation limitations, the field assessment of the project was not possible that would help further triangulation of data.

The only project rated C in consecutive assessments was the Project "*Capacity building government officials to engage in policy dialogue with CSOs*" in Bosnia and Herzegovina. This project was reviewed (under ROM) four times (2009, 2010, 2011, 2014) but failed to demonstrate progress from the ratings in the first ROM assessment in 2009. The only progress was visible in the area of effectiveness. Impact and sustainability were rated as the most challenging to achieve during all four ROM missions. The latest ROM report from 2014 stated that an incomplete beneficiary structure continues to jeopardise effective implementation and impact prospects. Besides, on impact, the ownership of benefits that would result from this project was assessed as weak on the side of beneficiary. The ROM suggested that such a situation might be explained by the lack of knowledge and understanding of EU procedures observed in these institutions. Stakeholder interviews reveal that the project has encountered a number of difficulties with relation to contextual issues that affect the institutionalisation of mechanisms across the government beneficiaries.

The Project *Support for Media Capacity in the Area of EU Integration* from Serbia was reviewed (under ROM) three times and demonstrated progress in ratings in the areas of efficiency, effectiveness and impact from B rating in 2010 and 2011 to A rating in 2013 ROM across the criteria.

For multi-beneficiary projects, out of six, 4 have B rating, one has A and one was without ratings. None of the projects was rated with C.

This evaluation confirms the findings of the Mid Term Evaluation of CSF which found that the impact of the instrument is visible through the fact that "[s]upported CSOs are better at what they do"¹⁰⁰ and also the thematic Evaluation of EU support to civil society from 2012. The 2012 Evaluation found that, overall, the EU contribution was considered as positive, noting that "*EU financial assistance to CS has also helped the European integration process to advance*"¹⁰¹, while helping CS in achieving its goals in areas linked to the EU strategic objectives, and building CS capacities in providing services, with emphasis on social services to vulnerable groups. The evaluation also concluded that the EU financial support has "*assisted the governments and CS through the promotion of an enabling institutional, legal and financial framework for a more vibrant CS, and through initiatives to establish functional relations between CS and government, particularly in favour of inclusion of CS in decision-making*".

¹⁰⁰ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey, p. 42

¹⁰¹ European Commission (2012); Thematic Evaluation of EU's Support to Civil Society in the Western Balkans (namely, Albania, Bosnia and Herzegovina, Croatia, the Republic of North Macedonia, Kosovo under UNSCR 1244, Montenegro and Serbia) and Turkey 2012 (link: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/financial_assistance/phare/evaluation/2012_eval_cs_final_report_2.pdf), p. 21

processes¹⁰². CSOs are at present increasingly able to participate in policy-making processes, and to provide their due contribution into draft legislation and policies. On the side of civil society, the evaluation concluded that EU financial support was instrumental in building the capacities of CSOs and their empowerment to take on a more proactive role in the democratisation processes in their respective countries. The EU has contributed to strengthening capacities, aptitudes, coverage, focus and operational capacities of CSOs. This has enabled them to respond more adequately to the needs of their beneficiaries.

The evaluation found that the introduction of structured project frameworks helped “*profiling of organisations in specific sectors and overall professionalisation of organisations*”¹⁰³. This approach “*positively affected the overall recognition of CSOs as important counterparts of the governments in different areas, and especially as service providers in areas of important need where the actions and means of governments have not yet reached a satisfactory level*”¹⁰⁴. On the other side, the evaluation concluded that “*impact and sounder sustainability of the EU’s support to WBT CSOs are still hampered by constraints of a primarily institutional character, such as an insufficiently consensual dialogue between the EU and the national institutional stakeholders in charge of managing EU issues.*”¹⁰⁵

Indicator 4.1b

Aggregate achievement of long-term results delivered through mainstreamed support

There is little evidence of long-term results delivered through mainstreamed support. Thematic evaluations of EU support to different sectors for the IPA I period have been conducted but these evaluations offer very fragmented insight into mainstreaming of support to civil society. Some exceptions are visible. For example, Thematic Evaluation of EU support to anticorruption integrated a survey for civil society to explore the views of civil society on contributions of EU to anti-corruption. The evaluation found that the “*contribution of the EU to the strengthening of CSOs in monitoring and reporting on corruption is positively viewed by 36% of civil society respondents, while half of the total sample sees it as a moderate contribution. The main responses are that the impact is limited, but many agree that the support still provides a good base for development of a strong EU anti-corruption culture, even though there are still many challenges in the area of implementation. The support is viewed as effective in the area of monitoring capacities of CSOs for the fight against corruption*”¹⁰⁶. Evaluations in other sector do not mention any concrete impacts on the civil society sector.

The evaluation Sector approach under IPA II concluded that “*The two main priorities of the Guidelines for EU support to civil society in enlargement countries 2014-2020 were only partially implemented: Building a conducive environment for CSOs’ existence and participation was not pursued by the governments and was not supported by IPA as a key crosscutting issue. CSOs’ participation relied on specific mechanisms led by NIPAC (especially for participation in IPA programming) and provisions/institutional arrangements linked to specific IPA supported programmes; Building the capacities of the Civil Society was better addressed by IPA through specialised facilities, tools and instruments (including CSO Facility, EIDHR, CSOs foundations, and specialised funds). Some of these were instead managed by the governments, thus running the risk of compromising the independence of the CSOs, which in some countries may be detrimental. In most beneficiary contexts, CSOs were not involved in assessments of the results or reviews of effectiveness and among them, a sentiment of dissatisfaction prevailed*”¹⁰⁷. The evaluation also noted that “*given the evidence gathered which shows that CSO participation – apart from the IPA programming process – is often merely nominal with little if any practical input*”¹⁰⁸.

Stakeholder interviews confirm the findings of evaluations, emphasising that the long terms results from mainstream support have not materialised due to very limited engagement with civil society within mainstreamed support.

¹⁰² Ibid, p. 21

¹⁰³ Ibid, p. 21

¹⁰⁴ Ibid, p. 21

¹⁰⁵ European Commission (2012); Thematic Evaluation of EU’s Support to Civil Society in the Western Balkans (namely, Albania, Bosnia and Herzegovina, Croatia, the Republic of North Macedonia, Kosovo under UNSCR 1244, Montenegro and Serbia) and Turkey 2012 (link: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/financial_assistance/phare/evaluation/2012_eval_cs_final_report_2.pdf); p. 8

¹⁰⁶ European Commission (2015); Thematic evaluation on IPA support to the fight against corruption, p. 147

¹⁰⁷ European Commission (2018); Evaluation of Sector approach under IPA II; p. 47 http://edz.bib.uni-mannheim.de/daten/edz-k/gde/18/SA_IPA_II_eval_Vol_1_final_on_19_March.pdf

¹⁰⁸ Ibid, p. 54

Indicator 4.1c	Aggregate achievement of long-term results delivered through policy-level engagement
<p>EU accession has been a critical driver for countries in the Enlargement region to invest in enhancing participatory and inclusive governance. This leverage helped move countries forward. However, it seems that the prolonged EU accession agenda also poses a threat to the decline of achievements due to the so-called EU integration fatigue at both the EU and enlargement candidates and potential candidates side, as confirmed by stakeholder interviews across the Enlargement region. There is evidence of positive impacts of combination of targeted and policy support. As discussed within the Indicator 4.1a, EU progress reports indicate generally positive trends in the ways in which governments treat civil society, with the exception of Turkey. Policy documents, such as indicative country strategy papers, EU sources (such as EU informational material, programming documents) and also interviews note that these contributions are resulting from combined direct support to civil society and policy dialogue and political backing of EU. For example, across the board of all Western Balkans countries it is clear that today's governments are more aware and perceptive of the need to engage with civil society in policymaking processes, resulting, inter alia, from EU support. Western Balkans countries also adopt and implement (albeit to various degree) strategies for cooperation with civil society (except in Bosnia and Herzegovina), also including mechanisms for engagement and consultations (a good example of an effective online consultation mechanism is found in Bosnia and Herzegovina).</p> <p>At the regional level in the Western Balkans, the EU offered political support to the so-called Berlin Process. While EU did not directly (financially) support the process, its convening power offered a very empowering support to civil society. However, document review and stakeholder interviews reveal that CSO engagement within this process does not show real concrete results for CS cumulatively. However, the establishment of the RYCO (regional youth cooperation office) was a big and tangible step forward.</p> <p>However, in Turkey, the impacts are not so visible due to the fact that the civil society is extremely vulnerable to political factors.</p> <p>It is noted that, across the board in the enlargement candidates and potential candidates, political (but also socio-economic) factors play a decisive role in facilitating or hampering results and impacts. Despite efforts and the EU integration 'carrot', these factors are still beyond the EU's control. The fact that the EU integration is slow and there is the so-called enlargement fatigue negatively affects the sustainability of achieved results and impacts.</p>	
<p>Judgement Criterion 4.2: EU's engagement with civil society has contributed to the promotion of conducive environments for CSOs and broader civil society actors in Enlargement region.</p>	
<p>Across the Enlargement region, it has been confirmed that the conducive environments for COSs and broader civil society actors for the period of 2007 to 2018 showed progress, with improved mechanisms for consultation with civil society and improved environment for civil society activities across the countries, with the exception of Turkey. Evaluation found that the steady progress across the region has happened also with contributions of combination of EU targeted support and policy engagement. Positive trends for the Enlargement region have been confirmed with a review of the latest Civil Society Sustainability report as well as EU Progress reports (with the exception of Republic of Northern Macedonia and Montenegro, which marked satisfactory situation already in 2007). A period between 2007 and 2018 marked a progress in terms of sectoral approach orientation overall, visible especially in the final years of IPA I and continued in IPA II. However, albeit positive results were marked in terms of more intensive and systematic consultations with the civil society in programming of EU sector support, civil society engagement in deeper sectoral issues as a result of EU mainstreamed support is not evidenced. Positive impact prospects of the policy level engagement have been driven by commitment to the EU accession by enlargement candidates and potential candidates, albeit with variations. However, due to a slow pace of the integration process its influence as a main driver has weakened.</p>	
Indicator 4.2a	Aggregate achievement of long-term results delivered through targeted support
<p>It is evident that the targeted support, combined with policy engagement had strong influence towards changing the practices and approaches of the governments towards the civil society. Review of EU progress reports across the Enlargement region show a steady progress in cooperation between civil society and official authorities,</p>	

whether at state or local level, has been recorded across the region. Improvement started mostly in 2010 or between 2010 and 2013, with the exception of the Republic of North Macedonia and Montenegro where the situation has been marked as satisfactory already in 2007. This positive trend continued in 2018, apart from Turkey, which experienced a negative trend and deterioration of civil society. Each country institutionalised inclusion of civil society through different legal instruments, but they all mark a lack of proper or complete utilisation of these instruments and, therefore a lack of successful involvement of civil society. Progress Reports target especially their participation in policy-making process, which was indeed improved, but even in 2018 mostly remained on an ad hoc basis, as i.e. in Kosovo*. Participation of civil society sector in the EU access negotiations has been also marked in all countries, but no progress in terms of intensity or importance of their involvement has been recorded.

Review of the latest Civil Society Sustainability report for countries in the region confirms positive trends. All countries in the region record slow but continuous progress in many aspects of development and strengthening of CSOs (except for Albania, which showed some regressive trends in 2017). The inclusion of CSOs has been mostly ensured through the establishment of a legal framework, although it has been rarely fully implemented. However, CSOs became noticeably more involved in the legislative process as well as in EU access negotiations, therefore it can be said that their role as an actor in political life has been recognised (See Tables 1 and 2 in sub-Annex 1).¹⁰⁹

Stakeholder interviews confirm that the support to civil society has contributed to the promotion of conducive environments for CSOs. Notably, stakeholders consider that governments are more aware and take note of civil society inputs which positively affects the level of participatory practices and decision-making. However, across broader pool of civil society actors in Enlargement region, the view is that EU has not structurally dealt with broader civil society, so the effects and impacts are not so pronounced.

Indicator 4.2b	Aggregate achievement of long-term results delivered through mainstreamed support
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The period between 2007 and 2018 was marked by consolidation of the EU's approach to programming towards a sectoral approach, particularly in the final years of IPA I and continued in IPA II. The sectoral approach orientation helped the EU enhance civil society mainstreaming in sectoral work of both the EU and also governments (within EU integration umbrella of actions). Comparative analysis of consecutive MIPDs (in IPA I) and Indicative strategy papers shows that civil society has been consulted, with more intensive and systematic manner since introduction of sectoral approach. The Meta Evaluation of EU IPA Assistance found that there have been *"improvements in the inter-sectoral cooperation and with the involvement of Civil Society Sector. Only in the case of Montenegro it was noted that, although local authorities were very responsive in the energy sector, not all actors – specifically the private sector - were actively involved and this would reduce sustainability. In Serbia better involvement of CSO in the planning and implementation is noted. The implementation of some of the IPA projects, especially Environmental Approximation Strategy required strong involvement of CSO and therefore IPA had a positive contribution to establishment of a culture of consulting environmental measures with NGOs active in this area. In Turkey Inter-institutional cooperation required by IPA TAIB is still deemed to be difficult during implementation. There are, however, some good examples. For MBP, coordination is a challenge as it involves beneficiaries in a range of countries with different capacities and specific issues. Co-ordination in some of the regional organisations is complex and not always as efficient as it could be. In the area of Rule of Law Judicial Reform and Fight against Corruption and Organised Crime support to CSOs has been ad hoc and seemingly without a longer-term and broad-based strategic perspective. In the area of Civil Society sector the extent to which a range of Civil Society Organisations and other key stakeholders have been involved in needs assessment, strategy selection and other relevant aspects of the intervention logic is moderately satisfactory. Compared to CARDS, IPA much better promotes participation of Civil Society and other stakeholders throughout the programming cycle"*.¹¹⁰ The Meta evaluation recommended that the *"IPA programming process could still benefit from adoption, implementation and enforcement of a set of Minimum Standards on Civil Society participation in IPA programming by all stakeholders"*.¹¹¹

¹⁰⁹ USAID (2018); 2017 Civil Society Organization Sustainability Index for Central and Eastern Europe and Eurasia 21st Edition - September 2018

¹¹⁰ European Commission (2013); Meta evaluation of Component I IPA assistance, p. 53

¹¹¹ Ibid, p. 53

The Evaluation of Sector Approach within IPA II¹¹² found that the engagement of civil society happened and was limited to programming of IPA Sector support. However, deeper engagement of civil society did not materialise, which was a strong criticism of the evaluation, also confirmed by stakeholder interviews performed within the scope of this evaluation. Hence, the evidence of impacts of mainstreamed support on the level of enabling environment was not found.

Indicator 4.2c

Aggregate achievement of long-term results delivered through policy-level engagement

Across the enlargement candidates and potential candidates, comparative analysis of the state of the conducive environment for CSOs and broader civil society actors for the period of 2007 to 2018 indicates positive trends. Countries (except in the case of Bosnia and Herzegovina) have mechanisms for cooperation (mostly in the form of Office for Cooperation with civil society), while the strategic and/or legislative frameworks have already seen improvements. One exception is Turkey, which is facing negative trends and shrinking space for civil society. Documentation review and stakeholder interviews show that the EU's contribution through combination of targeted, policy and mainstream support has been strong. The most important driver across the region has been the EU accession prospect. However, due to the fact that EU integration is going very slowly and with increasing conditionalities, as well as EU integration fatigue, the effects or drivers for policy level engagement at some moments decrease. As the democracy gains are still vulnerable across the region due to numerous factors, particularly when it comes to civil society, its profile and image in society, there is a significant space for EU's continued efforts in this regard.

Judgement Criterion 4.3: EU's engagement with civil society has contributed to the promotion of structured participation of CSOs and civil society actors in domestic policies, in EU programming cycles and internationally in Enlargement region.

EU's engagement with civil society through targeted, mainstreamed and policy level support has contributed to the promotion of structured participation of CSOs and civil society actors in domestic policies, in EU programming cycles and internationally in Enlargement region in Enlargement region. It has been further shown that this contribution could only been achieved through a combination of these types of support, with caveat that mainstreamed support helped significantly in terms of structured participation of CSOs and civil society actors in domestic policies and in EU programming cycles but did not address deeper sectoral issues as of yet.

Although the EU support was intended for national and local level, and the EU has been working with local authorities (e.g. ReLOAD project implemented by UNDP) variations between the levels are evident in all countries across the region. Central government has managed to systematically establish and apply consultation mechanisms, while local governments are still lagging behind in terms of different practices for consultations. Document review and stakeholder interviews indicate that the EU contribution to the promotion of structured participation of CSOs and civil society actors in EU programming cycles was probably the most visible change over the reference period for this evaluation.

Another effort invested by EU is towards to strengthening recognition of the need for inclusion of the civil society sector in policymaking and EU programming. One of the most straightforward examples was SECO Mechanism in Serbia, developed as a means to ensure structured consultation and input of civil society with regards to identified sectors, which is however, dismissed after some time. Although currently CSOs in Serbia are cooperating within a countrywide network National Convent, this is the area where further efforts are needed.

Indicator 4.3a

Aggregate achievement of long-term results delivered through targeted support

The EU targeted support, particularly through Technical assistance, service contracts or Twinning projects has contributed to the promotion of the structured participation of CSOs and civil society actors in domestic policies. Review of available government strategies for cooperation with civil society shows that all governments that do have these strategies integrate consultation mechanisms in their work. For example, the Government of the Republic of North Macedonia has had such a strategic framework

¹¹² European Commission (2018); Evaluation of Sector approach under IPA II; http://edz.bib.uni-mannheim.de/daten/edz-k/gde/18/SA_IPA_II_eval_Vol_1_final_on_19_March.pdf

since 2007, with revisions and updates for each policy cycle. The consecutive strategies integrate civil society consultations as a pillar of cooperation. Other strategies (e.g. in Kosovo*, Montenegro, Albania) are also integrating such practices.

There is an obvious difference between central and local/regional levels in all countries across the Enlargement region. While, central governments do establish and apply consultation mechanisms in a more systematic manner, local governments are still applying different practices for consultations (including, but not limited to, local Councils for CSOs, invitations for consultations, or other formal and informal venues for consultations). The EU, through technical assistance, inter alia, through ReLOAD project implemented by UNDP has been working with local authorities and modelling ways in which Civil society can be engaged in policy processes and also distribution of funds at local level. The ReLOAD Project started off in Bosnia and Herzegovina, and now has been multiplied and scaled to all Western Balkans countries.

In Turkey, the Sivil Dusun programme evaluation found that the *“EU encourages the active participation of citizens in the making of collective choices in Turkey, from agenda-setting for policies and legislation, to implementation and monitoring at local, regional, national, European and other levels”*¹¹³. It also found that capacity of the beneficiaries to liaise with decision makers have improved as some spill over effects of the support as a whole. The survey conducted within the scope of that evaluation indicated to disillusionment of civil society when it comes to the government, whereby *“more than half (56%) of the respondents have not observed improvements in the attitude of the public sector towards the civil sector, 19% have indicated improvement and 25% did not know or avoided to provide their opinion”*¹¹⁴.

The main driver for structured participation of CSOs and civil society actors in domestic policies, in EU programming cycles and internationally in the Enlargement region was EU's investment in development of organisational and advocacy capacities of organisations. These investments result in better preparedness of civil society actors to provide input. On the other side, the combination of policy dialogue and targeted support through projects of Technical assistance to the governments (e.g. in Serbia and in Bosnia and Herzegovina) and also of the TACSO project directly helped the promotion of the structured dialogue. The main challenges for more meaningful and structured dialogue is considered to be the level and availability of sector expertise of CSOs (particularly outside capitals) and the level of recognition, particularly at local level) of authorities that CSOs and wider civil society actors should engage and in what capacity.

Indicator 4.3b

Aggregate achievement of long-term results delivered through mainstreamed support

The insistence of the EU in engaging civil society in sectoral discussions, at programming level for sectoral programmes, particularly in IPA II has been an effort forward to strengthening recognition of the need for inclusion of the sector in policymaking and also in EU programming. Some countries, such as Serbia introduced a SECO Mechanism as means to ensure structured consultation and input of civil society with regards to identified sectors. This mechanism was discontinued after some time. However, currently Serbian CSOs gathered within a countrywide network called National Convent and work together to provide inputs and engage in negotiation on Chapter 23 and 24. The structured consultation in sectoral issues has been enhanced with direct contribution of EU. Nevertheless, this is the area where further efforts are limited.

Indicator 4.3c

Aggregate achievement of long-term results delivered through policy-level engagement

The changes achieved in terms of structured participation of CSOs and civil society actors in domestic policies, in EU programming cycles could only happen thanks to combined support through targeted, mainstream and policy support. A review of EUD websites in the region offers an insight into the extent to which EU officials advocate for and promote engagement of civil society over time (review of minutes of events and conferences, Special group meetings, press releases). Stakeholder interviews confirm that EU's contribution through political pressure and policy dialogue has been instrumental. For example, in Turkey, EU has been vocal about the need for protection of human rights defenders, sharing statements, declarations and at times also demanding visits to detention centres where civil society activists are held. In Western Balkans countries, public appearances of senior EU officials, at events and conferences, particularly on topics of Democracy, governance, social development

¹¹³ European Commission (2018); Final Evaluation of Sivil Düşün Programme, p. 20

¹¹⁴ European Commission (2018); Final Evaluation of Sivil Düşün Programme, p. 37

and human rights (but also in thematic meetings, such as PAR Special group) there is consequent promotion of the role and contribution of civil society. This has been a contributory factor to enhanced structures for participation of CSOs and civil society actors in domestic policies and in EU programming cycles.

EQ5 (Sustainability and Ownership): To what extent have the changes to which EU support have contributed proved to be sustainable after the end of EU funding?

Evidence collected through document review and stakeholder interviews confirms that the changes to which EU support have contributed shows varying level of sustainability prospects. There have been some steps forward in establishing legislative and policy consultation mechanisms for civil society. However, such mechanisms are still new and have not taken strong roots to enable them to be more of essence than form. EU progress reports across the countries in the region mention that there are varying levels of 'guarantees' for civil society involvement in policy-making; which still happens rather on an ad hoc basis and often only in specific phase of policy design. Financial sustainability is also hampered by legislative and bureaucratic obstacles as there are no transparent mechanism for public funding and no appropriate fiscal incentives. Capabilities, visibility and general development of Civil Society were enhanced through EU support, but in Turkey, for example, 2018 saw serious backsliding regarding development of Civil Society.¹¹⁵ Civil society in Turkey experienced increasing pressure, following the high number of detentions and arrests of civil society activists, human rights defenders or investigative journalists. In other countries, also there are varying levels of 'tolerance' of civil society, with pressure visible in some cases, such as most recently in Serbia. The fact that governments in many cases do not have or have an expired comprehensive government strategy to ensure cooperation with Civil Society, creates further difficulties to ensure CSOs are meaningfully supported and included in consultations as part of law and policy-making processes and monitoring.

One of the aspects depicting the overall sustainability of the changes achieved through the EU support is the aspect of CSOs capacities across the Enlargement candidates and potential candidates. Comparative overview of the Sustainability Index indicates that while all enlargement candidates and potential candidates mark slow but steady progress in this regard, there are still many obstacles. Civil society organisations are still largely donor driven and have project orientation applied due to the fact that funds are limited and sector priorities in which funding is available keep changing.

Solid foundations are laid by the EU towards involvement of civil society in the policy sphere, with positive sustainability outlook. This is particularly true when it comes to programming of EU support and also planning of sector strategies of government, albeit with variations. One weakness that has been evidenced by this evaluation is the lack of EU phasing-out measures and more systematic liaison with other donors on issues of sustainability.

Judgement Criterion 5.1: The results achieved through the EU's support and engagement with civil society allow the beneficiary organisations and actors to continue to operate as effective actors in the civic and governance realms

One of the indicators of general sustainability of the results achieved through the EU's support and engagement with civil society is certainly sustainability of developed capacities of CS. Comparative overview of CSO Sustainability index indicates that, with varieties, all countries in the Enlargement region (Turkey excluded) mark slow but steady progress in this manner. At the same time, civil society organisations encounter numerous challenges to sustainability due to lack of stable funding base, which results in donor driven nature of CSOs and project orientation, departing from their constituencies or changing thematic fields or working areas. This evaluation found evidence of improved managerial skills and organisational capacities through different EU interventions assisting organisational development (e.g. TACSO). However, the lack of systematic and transparent government funding for CSOs or lack of diversified funding base for organisations (e.g. from private sources; philanthropy, etc.) creates ongoing sustainability challenges for civil society. This in turn negatively affects the extent to which CSOs maintain their operations as effective actors in the civic and governance realms upon expiry of EU funds. Interviews with stakeholders reveal that in many cases, civil society organisations do not manage to maintain their advocacy or direct interventions due to lack of funding base.

¹¹⁵ Turkey EU Country Report, 2018

The EU has been a main driver for creation of enabling environment for civil society, as confirmed through document review and stakeholder interviews. EU has influenced governments to create more conducive environment for civil society through the establishment of mechanisms and legislative/policy solutions. However, these mechanisms are still fragile. For instance, countries such as Serbia and Turkey encounter shrinking civil society space and closing up of the government to civil society. Some interventions, such as the Project on strengthening dialogue in Bosnia and Herzegovina has limited sustainability prospects due to contextual challenges in the country.

Similar results are marked regarding the involvement of civil society in the policy sphere. EU involvement has been continuously high, resulting in strong foundation for civil society to engage and be(come) effective actors in civic and governance realms. Across the region (except Turkey), civil society engages more dynamically in the policy making processes and is increasingly seen as a partner of government. Same as with enabling environment, these foundations are still fragile and dependent on many factors, including government commitment to participatory decision-making and civil society sectoral expertise and capacity. Besides, this evaluation confirms the 2012 Evaluation of EU support to civil society finding that *“sustainability prospects also depend to a large extent on the overall democratisation processes in the countries in the region, and the full adoption and implementation of good governance standards.”*¹¹⁶

Indicator 5.1a

Extent to which the capacities developed under EU support are sustained.

A review of available documents and stakeholder interviews indicate that civil society is more capable of operating as effective actors in the civic and governance realms. Comparative review of CSO sustainability index over the years shows slow but steady progress, with variations in different countries (Turkey is not included, as CSO sustainability index for that country was not available). For instance, Albania is the only country with a slightly increased overall sustainability of CSOs. There was no progress in organisational capacity, which remained hindered by several obstacles. These mostly trace back to a lack of sustainable funds. Although most CSOs develop their own missions and strategies, they cannot afford to implement them, as they lack funds. Instead, they often change their target groups and their fields of work to harmonise them with donor's priorities, becoming donor driven and project oriented. The Republic of North Macedonia experiences the same problem, but in 2017, it recorded a progress in strategic planning, due to donor-supported programmes. Also, The CSO Sustainability study found that Montenegro based, well-developed organisations regularly conduct strategic planning. An internal management system has been only formally implemented, while in practice there is no genuine division of responsibilities between governance and management leaders. Similar trend is observable in all countries and there was no change in this area.

CSOs in all countries continued good service provision in 2017 without any significant change. The only improvement has been visible in Albania and it came as a result of incremental change since 2008. Over almost a decade, number of CSOs in Albania providing services to their constituencies has increased and the state has increasingly recognised the role of civil society in providing services. Public perception of CSOs has improved in several countries, as research across the countries show an increase in public trust. Bosnia did not show any progress in this domain in 2017 and CSOs were still often considered as inefficient. Only the Republic of North Macedonia deviates strongly as due to the “de-Sorosisation” CSOs’ the public image deteriorated significantly. The situation changed significantly with government changes during last elections in 2017.

It is evident that the investment in capacities of organisations is a strong sustainability factor, particularly for those organisations that directly benefited from implementing EU projects. Review of project samples and stakeholder interviews show that project partners from the countries in the region and also grant beneficiaries accumulated knowhow and positive experience transferred by their EU-based project partners, thus building up their organisational capacity in the respective fields of project interventions. This directly contributes to improving the quality of the services offered to their constituencies. For instance, the exchange visits organised under almost all actions and the institutional and management experience shared by the representatives of the EU project partners contributed to improving the managerial skills of the organisations.

¹¹⁶ European Commission (2012); Thematic Evaluation of EU's Support to Civil Society in the Western Balkans (namely, Albania, Bosnia and Herzegovina, Croatia, the Republic of North Macedonia, Kosovo under UNSCR 1244, Montenegro and Serbia) and Turkey 2012 (link: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/financial_assistance/phare/evaluation/2012_eval_cs_final_report_2.pdf), p. 29

Indicator 5.1b	Extent to which the achievements seen in creating an enabling environment for civil society are sustained.
<p>As discussed above, there is a visible incremental change in the way that the government enhances the enabling environment for civil society through the establishment of mechanisms and legislative/policy solutions. EU accession has been the main driver for governments to undertake such efforts. However, these mechanisms and good practices are still fragile and dependent on a number of factors, primarily political factors that threaten sustainability of achieved results. Examples can be found in Turkey with the recent backsliding of democracy, particularly after the coup in 2016. In Serbia, during 2009-2011 the policy of the Serbian Government towards civil society organisations was defined as positive and supportive in the EU progress reports and other studies (such as the TACSO needs assessment, sampled project reports). The improvements in the legislative framework for CSOs, the elaboration of sustainable mechanisms for cooperation with civil society organisations, their involvement in the programming of the next IPA periods and in important governmental initiatives and projects were a confirmation of willingness to support and cooperate from the side of the Serbian Government and in the Parliament. However, as of recently, there has been a regression in the way in which government cooperates through the Office for cooperation with civil society but also more generally, as noted in EU country reports and highlighted in interviews with stakeholders.</p> <p>The 2012 Evaluation of EU support to civil society noted that <i>“sustainability prospects also depend to a large extent on the overall democratisation processes in the countries in the region, and the full adoption and implementation of good governance standards. Other factors include the political climate and overall recognition and image of CS in the societies in the region, which have not yet reached a satisfactory level in most of the WBT beneficiary countries”</i>.¹¹⁷</p> <p>In Bosnia and Herzegovina, review of ROMs relating to technical assistance to government showed that sustainability of assistance was jeopardised by political factors but also lack of understanding of beneficiary government structures of EU procedures and regulations. This was also confirmed by stakeholder interviews for this evaluation. Aside from political factors, lack of understanding of beneficiary government structures of EU procedures and regulations seems to be the most common factor hampering sustainability. Project documentation and evaluations indicate that government institutions in some cases have not been familiar with procedures and approaches to work with EU projects, and this was hindering their ownership. Lack of ownership then negatively affected sustainability prospects, due to resulting lack of commitment to the project results and their sustainability. Another important challenge recognised in TACSO Needs assessment reports and other studies on civil society produced in different countries in the region is the general lack of understanding and familiarity between civil society and government, which affects the level of motivation to work together. This was also confirmed through stakeholder interviews which highlight that there is some sort of social distance in some cases between government and civil society, particularly in local communities creating difficulties to understand what each sector can do for one another, leading to issues in terms of consultative process.</p>	
Indicator 5.1c	Extent to which the achievements seen in enhanced involvement of civil society in the policy sphere are maintained.
<p>The review of available country strategies for cooperation with civil society show a strong orientation towards ensuring involvement of civil society in the policy sphere. The level of actual involvement of civil society in decision making processes varies, depending on topics, level of government, sector, etc. However, document review and stakeholder interviews confirm that foundations laid thanks to the EU, inter alia, are solid and they would be hard to reverse. For instance, civil society consultation mechanisms exist for programming EU support and also for main sectoral strategies across countries in the region, though with variations. However, all policy and programming documents, including the most recent ones (such as CfPs, sector documents, Guidelines for civil society) note that this is an area where further investment is necessary and would be supported.</p>	

¹¹⁷ European Commission (2012); Thematic Evaluation of EU's Support to Civil Society in the Western Balkans (namely, Albania, Bosnia and Herzegovina, Croatia, the Republic of North Macedonia, Kosovo under UNSCR 1244, Montenegro and Serbia) and Turkey 2012 (link: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/financial_assistance/phare/evaluation/2012_eval_cs_final_report_2.pdf), p. 29

Judgement Criterion 5.2: The design and implementation of EU interventions and activities have facilitated sustainability

The manner in which the EU support to civil society organisations is conceptualised is not in itself favourable to ensuring projects that provide for good results are extended if need be. This is due to the fact that EU support is organised through CfPs within civil society instruments (e.g. CSF, EIDHR, or even CBC), whereby the projects are selected within each round based on a transparent set of criteria and selection process. On the other side, the design and implementation of EU interventions and activities in most cases integrates sustainability, albeit to varying degree depending on the topic, contextual challenges and also due to the duration of projects. Stakeholder interviews reflect that many projects suffered from short duration and overambitious plan, which in their opinion is often driven by the need to win the project. Also, there is no evidence of EU's deliberate approach to developing and deploying phasing-out measures. These challenges negatively affect the sustainability of results achieved with EU support.

Regarding the liaison over sustainability with the key stakeholders in the civil society, governmental and international donor sphere, there are evidence that the EU liaised with other donors to continue projects started by other donors or extend support to make sure such interventions have higher sustainability prospects (e.g. Serbia, grant making scheme of the Trag foundation started by USAID were continued by EU through grant support). However, there is no other type of liaison that would create stronger leverage for sustainability.

Indicator 5.2a **Phasing-out measures were developed and deployed.**

Review of all available documentation (at policy level, programming or project level) for this evaluation did not come up with concrete evidence or example of developed and/or deployed phasing-out measures. Also, interviews did not indicate such examples, noting that this is something that is not usually required. On a contrary, due to the fact that the EU funds are disbursed through selection of projects submitted in response to CfPs, there is very limited possibility to extend a project that is performing well and making a difference. Absence of mechanisms for EU or civil society to extend good projects through direct continuation (not going through application process) is an important weakness in opinion of stakeholders, and diminishes the prospects of impact and sustainability.

Indicator 5.2b **Effective liaison over sustainability was conducted with key stakeholders in the civil society, governmental and international donor spheres.**

Review of documentation at all levels (policy, programming, CfPs, projects) shows that the element of sustainability is very important to the EU and also to other donors. As interviewees note, the EU has been using the combination of targeted and policy support as a vehicle to ensure that framework conditions are there to facilitate sustainability of results. Most importantly, EU's political pressure and leverage has been a driver to ensuring more transparent government funds for civil society (e.g. in Serbia with establishment of the budget line 481 for civil society). However, evidence collected through document review and stakeholder interviews does not provide insight into the existence of liaison over sustainability with key stakeholders in the civil society, governmental and international donor spheres.

EQ6 (Coordination, complementarity and coherence): To what extent have the various forms of EU engagement (including policy dialogue and financial support) with civil society in the Enlargement region been effectively coordinated, complementary, and coherent with the activities of EU MS and other donors?

Document review and stakeholder interviews show consistent evidence that various forms of EU engagement (including policy dialogue and financial support) with Civil Society in Enlargement region have been effectively coordinated with the activities of EU MS and other donors. The EU invests the efforts to hold coordination meetings with EU Member States and other active donors. There are examples of joint policy stance in issues of matter to civil society (e.g. in Turkey) and also of coordinated efforts in responding to the needs of civil society more widely (e.g. supporting organisational development, watch dog and advocacy roles, etc.) There is complementarity

in the application of EU instruments in support to civil society, as well as in the allocation of funds between the instruments (EIDHR, CFS, IPA CSB). In relation to allocation of funds, there is evidence of appropriate “division of labour” between these instruments, whereby for example EIDHR is investing more in its human rights, CFS concerns more with the support for democracy and media, while CBC promotes initiatives of grass roots organisations, cooperation of government and civil society and social cohesion.

At strategic level, EU, EUMS and other donor strategies for civil society are coherent and provide for common vision of the role and positioning of the civil society in public realm. However, at the level of actual support, some overlaps have been noted between calls for proposals and supported projects funded by EUDs, the DG NEAR and other donors. For example, although there is some evidence of exchange of information between the IPA regional project "Capacity Building of Civil Society Organisations in Western Balkans and Turkey" and the USAID funded project "Stable development of NGO sector", shortcoming in terms of lack of formalised coordination as well as synergies across the two interventions were identified.

Judgement Criterion 6.1: Links between policy work, multi-stakeholder dialogues (e.g. fora) and financial support were effectively established and coordinated in the Enlargement region.

As discussed across the evaluation questions, there are direct links between policy work and financial support, which have directly influenced a number of outcomes, particularly in terms of stronger engagement of civil society in policy processes and strengthening enabling environment for CSOs. EU also invests in multi-stakeholder dialogues (e.g. fora), leveraging its positioning towards better engagement of civil society. Such examples are the Special Groups, regional events (e.g. the Berlin process) but also other multi-stakeholder dialogue for a including EU DGs, EEAS, EUDs, EUMS, etc. Evaluation found that there is overall good coordination between EU DGs, EEAS and EUDs and rather coherent approach and orientation when it comes to support to civil society.

There is a complementarity in the application of instruments, as well as in the allocation of funds between the instruments- EIDHR, CFS, IPA CSB. In relation to allocation of funds, there is a trend towards the “division of labour”, so for example EIDHR is investing more in its human rights, CFS concerns more with the support for democracy and media, while CBC promotes initiatives of grass roots organisations, cooperation of government and civil society and social cohesion. However, at the level of actual support incoherence has been noted between calls for proposals by EUDs, the DG NEAR and other donors.

Indicator 6.1a

Effective coordination among relevant EU DGs, EEAS, EUDs etc. was established over the question of EU engagement with civil society

In general, there is effective coordination among relevant EU DGs, EEAS, EUDs. The EU understanding is coherent in terms of what the support to civil society needs tackle across all areas of the EU engagement with countries within EU accession process, and this is visible from the review of strategic documents pertaining EU accession agenda. Review of available evaluations of EU support to civil society shows that introduction of CSF as a special civil society related instrument resulted in more coherent approach of EU to the sector¹¹⁸.

At the level of actual support there is a noted incoherence between calls for proposals by EUDs, the DG NEAR and also other donors. Namely, the Mid-term Evaluation of CSF notes *“There is a lack of consistency between EUDs and between EUDs and DG NEAR in the frameworks of calls for proposals. While not strictly speaking a ‘problem,’ this lack of consistency is indicative of a lack of coherent direction. EUDs do not know enough about multi-beneficiary/regional projects, generally and in their country. There is a related lack of correlation in the responses provided by EUDs and DG NEAR to questions from funded organisations. There is not enough learning across or between EUDs and up to DG NEAR, particularly in relation to successful approaches and strategies.”*¹¹⁹

¹¹⁸ European Commission (2012); Thematic Evaluation of EU's Support to Civil Society in the Western Balkans (namely, Albania, Bosnia and Herzegovina, Croatia, the Republic of North Macedonia, Kosovo under UNSCR 1244, Montenegro and Serbia) and Turkey 2012 (link: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/financial_assistance/phare/evaluation/2012_eval_cs_final_report_2.pdf)

¹¹⁹ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey, p. 8

There is complementarity between instruments. The EIDHR and the CSF, as well as IPA CBC complement each other. Each instrument has specific features and is used accordingly: The EIDHR complements and adds value to the CSF and CBC by allowing funds to go to the activities of CSOs (and individuals) even when the government does not approve.

In the allocation of funds, there is also a trend towards the "division of labour" between CSF, CBC and EIDHR. The EIDHR is investing more in its human rights, while support for democracy through the participation of civil society is increasingly devolving to CSF, as well as support to media. CBC, at the same time, promotes initiatives of grass roots organisations and cooperation and joint projects of government and civil society. At the same time, strong CBC component is building social cohesion, which is extremely important in the post-war societies of the Western Balkans.

Judgement Criterion 6.2: The combined efforts of the EU and EU Member States and other donors have led to a coherent and complementary response to the needs of civil society.

Document review and stakeholder interviews confirm that combined efforts of the EU and EU Member States and other donors have led to a coherent and complementary response to the needs of civil society across all the countries in the region. EU is the single most important donor, with EUMS and other donors contributing to the development of civil society in mostly coherent manner and with joint message. This is a result of invested efforts of EU senior officials coordinate with EU Member States and other active donors, which is commended by all interviewed stakeholders. Weaknesses exist however particularly in terms of coordination at the level of specific areas of interventions within the more general civil society support framework. Evaluation found that the coordination at regional level particularly is not so visible and systematic, which leads to some overlaps.

Indicator 6.2a

Effective coordination between the EU and EU Member States and other donors was achieved.

Coherence and coordination with other donors takes place in all geographies of the CSF, to a greater or lesser level of effectiveness. The EU, as the most relevant international actor, takes on leadership of donor coordination meetings in different sectoral areas. A review of programming documents for civil society (e.g. CSF action documents) indicates that the Section 2 of the document focuses on overview of past and ongoing assistance of EU and donors. However, the last Action Document from 2017 does not mention exact linkages or other donor interventions. The Meta Evaluation of EU IPA assistance concluded that *"In the Civil Society Sector, the procedures need improvement in order to take sufficient account of how other donor interventions help meeting accession requirements"*¹²⁰. There is a *"range of processes in place to ensure the work and priority of other donors and the EU are coordinated, and these generally work well but tend to be more at the level of reporting on priorities, directions and funded activities, rather than on coordination of efforts — on sharing of information rather than on any focused attempt at coherence."*¹²¹

Review of documents and interviews with EUD teams point to efforts of EU senior officials to hold coordination meetings with EU MS and other active donors. Such meetings are both formal coordination meetings on the issues of civil society and informal meetings. In Turkey, for example, EU and other international actors gathered on different occasions where pressure on civil society happened to draft joint letters or reactions to such cases.

There is also coordination at regional level, though it is not always visible. For example, the Swedish Sida Study on Swedish Support to a Pluralistic Civil Society in Serbia, Kosovo*, Albania and Bosnia and Herzegovina¹²² noted efforts at country and regional level by different donors, ensuring that SIDA support is aligned with those efforts, and in particular with interventions of EU.

¹²⁰ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey, p. 46

¹²¹ European Commission (2017); Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey, p. 46

¹²² SKL International Consortium (2015); "Assessment of Options for Continued Swedish Support to a Pluralistic Civil Society in Serbia, Kosovo*, Albania and Bosnia and Herzegovina"

Judgement Criterion 6.3: Synergies were achieved and duplication of efforts of the EU, EU MS and other donors was avoided in the Enlargement region.

Evaluation found synergies between EU, Member States and other donors at the level of strategic orientation towards civil society and their support to the sector. There are in general no deviating visions on the issues of civil society. However, there is evidence that at project level there are some shortcomings when it comes to synergies and overlaps among donors but also among projects funded by EU. For example, although there is evidence of exchange of information between the IPA regional project "Capacity Building of Civil Society Organisations in Western Balkans and Turkey" and the USAID funded project "Stable development of NGO sector", project reports described shortcomings in terms of formalised coordination as well as for the synergies in order to avoid overlaps.

Indicator 6.3a

Extent to which synergies were identified and exploited, overlaps were avoided at the policy level

Reviewed documentation, such as strategies or programmes for support to civil society of different donors active in the Enlargement region indicates that the EU, EU MS and other donors in general do not have deviating visions on the issues of civil society. Also, review of awarded projects by different donors (e.g. USAID, Norwegian, Swiss or Swedish) in the enlargement candidates and potential candidates show complementarities and general agreement of areas or sectors of support. Stakeholders interviewed within the scope of the evaluation consider that the overall coherence and synergies are more and more made possible with stronger elaboration of strategic priorities and consultations with civil society and other donors. It helps that the EU accession agenda is a driver with clear priorities and paths as well, particularly since establishment of the sector support, which helps coherent presentation of needs and priorities. However, the main shortcoming is the level of understanding and operationalisation of mainstreaming of civil society in sector support, which would have helped better prioritisation.

Indicator 6.3b

Extent to which synergies were identified and exploited, overlaps were avoided at the implementation level.

A review of documents shows that the EU is basing its approaches on the analysis of donor activities in each country. However, it is evident that, at a project level, there are shortcomings in terms of level of coordination of efforts among similar interventions in order to avoid overlapping and to ensure benefits are maximised. For illustration, documents reviewed for the project in the Republic of North Macedonia: *CSOs for Making Local Democracy Work - Reinforcing the role of civil society in dialogue and co-operation for democratic governance*, do not detail coordination with another existing EU intervention in the very field within which the project operates. Furthermore, Project *Capacity building government officials to engage in policy dialogue with CSOs* in Bosnia and Hercegovina faced insufficient donor coherence, lack of complementarities and coordination as weaknesses which could negatively influence the project impact (Project Monitoring report, 2009).

There is some evidence of exchange of information between the IPA regional project "Capacity Building of Civil Society Organisations in Western Balkans and Turkey" and the USAID funded project "Stable development of NGO sector", mainly due to the fact that the Civil Society Promotion Centre (CPCS) was involved in both projects. However, the IPA Project noted that establishing of close and formalised coordination will be indispensable in order to avoid overlapping, achieve synergies and maximise the common impact of all three interventions (Project Monitoring report 2009).

On the other hand, a very good example of coordination is *Strengthening Serbia-EU Civil Society Dialogue* project in Serbia which managed to bring donors together and ensure synergies.

EQ7 (EU-added value): To what extent have the various forms of EU's engagement with civil society in the Enlargement region over the evaluation period had characteristics which distinguished it from that of other actors?

The EU is the single most important actor and donor in the Enlargement region. The region faced significant shrinking of donor support within the reference period of the evaluation, creating space for EU to combine and leverage its financial support with strong EU accession policy dialogue. As noted in the Section on Impact, The EU membership perspective has been considered the strongest external driver of domestic political change in the countries of the Western Balkans and to lesser extent

Turkey, as confirmed by document review and stakeholder interviews. This distinguishes the EU from all other actors, particularly from the point of view of positive general support to EU integration across the region.

Judgement Criterion 7.1: EU support to civil society in the Enlargement region has had a distinctive feature in comparison with that provided by other actors, based on its comprehensive and multi-faceted approach.

EU support to civil society in the Enlargement region has been the single most important investment in the sector, particularly since late 2000s. Due to a variety of reasons, including gradual development and consolidation of socio-economic environment in countries, the global financial crisis and EU accession priorities, the donor space has been rapidly shrinking. Also, across the period of this evaluation, no other donor has invested in civil society in a comprehensive manner with multi-faceted approach like EU did. Other donors mostly engage with civil society organisations on individual basis or through CfPs, but without necessarily investing in systematic dialogue with governments and or building capacities of government to strengthen their consultation mechanisms, like EU did. Also, no other donor insists or envisages support to civil society through their sectoral interventions.

Indicator 7.1a

The combination of forms of engagement with civil society has been a distinctive feature of the EU's support.

The EU integration process and gradual shift from transitional to EU accession countries but also the global financial crisis has resulted in gradual shrinking of donor assistance other than EU. Some slight change was brought about by the migrant crisis which hit the region since 2015, though most of the support was humanitarian and subsided with decreasing number of migrants crossing over to the Western Balkans. In Turkey, the migrant support is still high. Documents and stakeholder interviews confirm that EU is the only donor applying a combination of forms of engagement with civil society, making it a distinctive feature of EU support. The EU MS assist the EU whenever needed in ensuring common stance in policy dialogue on questions of importance for the country and its civil society, notably on human rights and freedoms. For example, the EU support to civil society in Turkey was directed through a combination of policy and political support and financial assistance.

Field inquiry in Bosnia and Herzegovina gathered feedback from other donors (USAID) and also civil society who agree that the EU leverage combined with financial support is a strong value added and a driver of democratisation process in the country, albeit with limited outcomes due to complexities of the country's state and society structures. All interviewed stakeholders agree that the combination of forms of engagement has brought important outcomes in the way in which civil society is perceived by the government and included in policy processes. Another value added is contribution to professionalisation and raising standards for civil society, which happened thanks to the combined forms of support.

Indicator 7.1b

The combination of thematic and regional instruments has been a distinctive feature of the EU's support.

Review of available reports and evaluations of EU support to civil society points to the fact that no other donor invests so strongly in the region, and particularly not through combination of thematic and regional instruments has been a distinctive feature of the EU's support. Funds from EU MS are minimal and usually only offered on project to project basis, in support or to complement EU support. USAID remains active in the region with large financial envelopes for civil society, though no regional instruments were evidenced. In this regards, EU has been perceived as having this distinctive feature which helps building social cohesion and regional links across countries through joint thematic projects.

Indicator 7.1c

The combination of modalities and modes of engagement has been a distinctive feature of the EU's support.

A combination of modalities and modes of engagement has been a distinctive feature of the EU's support. Civil society but also non-EU actors interviewed for the purpose of this evaluation emphasise the fact that different modalities and also increasing engagement with grass roots organisations through sub granting are relevant and valued investments in empowerment of civil society.

EQ8 (EU-added value): To what extent could changes, which the EU contributed to, have happened in its absence?

The Enlargement region countries faced significant transition and, in some countries, post-war reconstruction that entailed tectonic changes in the ways in which societies operate. Available evaluations and policy documents indicate that the EU's support and the EU membership perspective has been considered the strongest external driver of domestic political change in these countries. The changes would most probably happen within societies but would take significantly more time than without the support of the EU and it cannot be assessed with what outcomes and challenges.

Judgement Criterion 8.1: EU support has been an essential factor in contributing to significant change in the sphere of civil society development in each of the regions.

Due to its specific role and leverage, EU has been able to provide support that has been different from support provided by other donors. It managed to combine modalities of support, whereas particular value added is seen in combination of targeted support and policy dialogue. In addition, leveraging EU accession perspective with funds directed to civil society capacity and empowerment was another additional value in comparison to other donors.

Indicator 8.1a	EU support has responded to an extent or in ways not provided by other donors.
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As discussed across this report, EU has responded well to the need to support development of civil society as contributors to consolidation of democracy. Particular value added is seen in combination of targeted support and policy dialogue, as emphasised through stakeholder interviews. No other donor has applied a combination of assistance that EU did, either due to lack of funds, or interest and importantly lack of such leverage that EU has particularly from the EU accession aspirations of the countries in the Enlargement region.

Indicator 8.1b	The EU has been able to leverage institutional and financial resources not available to other donors.
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As mentioned above, the EU is the single biggest donor to civil society across the region. Leveraging EU accession perspective with funds directed to civil society capacity and empowerment was an additional value in comparison to other donors, as also confirmed through stakeholder interviews.

Sub-Annex 1. Tables

Table 1. Democracy scores in Western Balkans and Turkey

	2006	2008	2010	2012	2014	2016	2018
Albania	7.25	7.5	7.55	7.25	6.7	6.95	7.1
Croatia	9.1	8.85	8.5	8.4	8.45	8.4	8.4
Bosnia and Herzegovina	6.8	6.7	6.5	6.4	6.35	6.3	6.1
Kosovo			6.95	6.7	6.6	6.65	6.5
Macedonia	7.55	7.75	7.95	7.6	7.2	6.65	6.5
Montenegro	7.4	7.85	7.8	7.6	7.9	7.85	7.6
Serbia	7.4	7.75	8	8.05	7.95	7.85	7.7
Western Balkans	7.58	7.73	7.61	7.43	7.31	7.24	7.13
Turkey	7.05	7.05	7.65	7.65	7.55	7.25	5.6

Source: Bertelsmann Stiftung, Democracy Status. These results are broadly consistent with those from another frequently quoted source, Freedom House.

Table 2. CSO Sustainability Index



Source: USAID (2018); 2017 Civil Society Organisation Sustainability Index for Central and Eastern Europe and Eurasia 21st Edition - September 2018

Table 3: Summary of donor funding to civil society in the Balkans, 2010-2011

	Total Amount of Funds allocated in EUR	Funding to civil society in EUR	Funding to Civil Society in %	Biggest donors & amount in EUR
Albania	247 million	9,8 million	4	EU - 4.5 million
Bosnia and Herzegovina	342,8 million	8,5 million	2,5	EU - 4.2 million
Macedonia	206.4 million	5.625 million	2.3	EU - 2.1 million
Montenegro	123.6 million	3.7 million	3	Norwegian Embassy - 1.2 million
Serbia	559.3 million	12.3 million	2.2	EU, SIDA , OSI – each 2 million
Kosovo	240 milion	19.7 million	8	SIDA - 4.2 million

Source: BCSDN (2012); Donors' Strategies and Practices in Civil Society Development in the Balkans: Civil Society: Lost in Translation?

2. Neighbourhood South

EQ1 (Relevance): To what extent have the EU's objectives and approaches to its engagement (policy and financial support) with civil society properly addressed the variety of problems faced by / needs of civil society actors in the Neighbourhood South region over the evaluation period?

Judgement Criterion 1.1: The EU's objectives with regard to its support to civil society have evolved effectively in line with the needs of civil society actors over this period in the Neighbourhood South region

In 2012, the EU achieved a key policy shift, resulting from the convergence of two parallel processes: one at the global level with the structured dialogue initiated in 2010 and culminating in the 2012 COM, and the other at the regional level, with the Arab Spring and two revisions of ENP policy (2011 and 2012) to address it. In 2012, a consolidated EU democratisation policy through support to civil society, is defined, both at global and regional level, which responded to the need of civil society to engage and contribute to the democratic transition process.

there is a clear consensus to emphasise the relevance of the EU's engagement objectives with CS regards the political context and the democratic transitioning of the ENP South countries over the period. Many criticisms are made by CSOs about the EU's engagement with the CS before 2011. On the other hand, CSOs recognise the changes made since 2011/2012. Among respondents, emphasis is more particularly made on the first capacity building EU objective they consider most relevant to their needs.

In the face of the internationalised civil wars in Syria and Libya, resulting in increased migratory flows to Europe, the election of Islamist governments in several countries, the authoritarian counter-revolution in Egypt and the general tendency to tighten civic spaces in most of the countries, the EU revised in 2015 its ENP policy in a more stability and security oriented direction, appearing less aligned with the objectives of the 2012 COM.

Operating democratisation objectives through support to CSOs in authoritarian contexts, without resorting to restrictive political or financial measures to governments violating human rights or limiting civic spaces, is what is also underlined as the key element of low relevance.

Consultation with civil society is mandatory, and is included in both policy documents and internal review mechanisms. There is since 2012 a systematic consultation of CSOs before or during the drafting of key policy, programming or even technical documents: During the identification and formulation phase, CSOs are consulted to identify priorities that will be indicated in the guidelines of the Calls for Proposals.

Although efforts are recognised to have been made to mainstream the participatory approach in identifying needs and consulting for programming, especially since 2011. The lack of diversity of actors, the formalism of the meetings (tick the box) and the absence of exchanges and follow-up after the consultations are persisting criticism expressed by respondents. The EUDs recognise that consultations are carried out with limited means, gathering small number of capital-based organisations.

At the political level, there are regular consultations with CSOs through several mechanisms that constitute the HR diplomacy of the EU. CSOs are key informants feeding the EU's knowledge on the HR situation in the country.

At the regional level, consultations with CSOs were further instituted from 2014 and the launch of the CS Facility South regional program, including technical assistance for the establishment of a CS Forum South. 4 annual sessions (along with regional preparatory sessions) were held between 2014 and 2017. As the dialogue was rather structured by the EU, or at least, to respond to EU's need, through a technical assistance, CSOs represented were mostly EU financial partners of the countries. A new setting for the CS Forum South was decided with the launch in 2018 of a granted programme, called the "hub" and then "Majalat", led by a

consortium of regional organisations. When asked, the CSOs responding are satisfied with the EU efforts to initiate such a policy dialogue with the CSOs at regional level. however, many organisations interviewed that once participated in the CSF are not convinced by the value for their organisation and their actions.

Indicator 1.1a

Stakeholders confirm the relevance of EU objectives relating to its engagement with civil society over the period under evaluation.

Through the 2012 Communication, the EU has three global engagement goals with civil society, not just in the Southern Neighbourhood.

Priority 1: To enhance efforts to promote a conducive environment for CSOs in partner countries.

Priority 2: To promote a meaningful and structured participation of CSOs in domestic policies of partner countries, in the EU programming cycle and in international processes.

Priority 3: To increase local CSOs' capacity to perform their roles as independent development actors more effectively.

Several categories of stakeholders have been consulted to question the relevance of these objectives, if they address the variety of problems faced by CSOs in the region.

1. CSOs: through questionnaires, interviews at CSF-South, field visits to Morocco, Palestine and Israel.

2. EUDs and Member State representatives, more specifically in the three field mission countries: Morocco, Palestine and Israel

It should be noted at first that when asked about the EU's engagement objectives with civil society, CSO respondents are not always aware of what the objectives are; and nor are they necessarily aware of the CS roadmap.

There is a clear consensus to emphasise the relevance of the EU's engagement objectives with CS regards the political context and the democratic transitioning of the ENP South countries over the period (forward, status quo, backward). The democratic movements of 2011/2010 have deeply restructured and reconfigured the political map of the region. They also coincided with the EU's policy review process around the "structured dialogue" since 2010, culminating in the COM 2012.

In the civil society questionnaire and through targeted interviews, many criticisms are made about the EU's engagement with the CS before 2011. On the other hand, CSOs recognise the changes made since 2011/2012, and the relevance of the objectives in the transitional contexts. The answers to the CSO questionnaires from Tunisia, Morocco but also from Jordan highlight in a positive way the change of objectives made with regard to the improvements of practices on the part of the EUDs in terms of consultation, outreach, identification, new support more adapted. The majority of CSOs surveyed place particular emphasis on the first capacity building EU objective they consider most relevant to their needs, matching at least their expectations of what a support to CS should be. The issue of shrinking space related to the EU Priority 1 (2012 COM) is also highlighted as a major problem affecting all countries in the region. It is a structuring theme in the CSF-South in which the dialogue with the representatives of the EC are lively, the CSOs calling for more appropriate support in the context of shrinking space or requiring a balance of power with the Partner States. In the surveys, the answers concerning Priority 1 are developed more critically by questioning the link between the scale of needs and the resources or input deployed. They confirm the importance of Priority 1 and 2 and their need for support in this area, but question more about what has been done in these areas (see EQ2, 3, 4).

CSO respondents with regional coverage are much more critical in the surveys and highlight the gap "between financial support for political needs". They underline the low relevance of these democratisation policy objectives in authoritarian contexts if they are not associated with more restrictive political or financial measures, specific levers within the framework of a conditionality system (EQ 4). Some argues that "working on participatory democracy in an authoritarian regime does not make sense. "

The survey of EUDs complemented by written exchanges and interviews show the importance of applying the principle of differentiation to judge the relevance of these objectives as the needs of civil societies are differentiated. The case of Israel is emblematic in that civil society already operates as an independent actor of development. EU Priority 3 (2012 COM) appears to be of little relevance here (except for some segments of civil society, particularly Arab ones - CBOs), while Priority 1 and 2 appear more relevant, particularly with regard to Israeli CSOs working on the occupation of the Palestinian territories. The situation in Palestine is also marked by the strong capacities of the CS especially in comparison to those of the State in terms of specialisation and technical expertise, qualified job offers, provision of services to the population, but also in terms of mobilisation and advocacy capacities toward public authorities and therefore of independence. This also applies (for other reasons) to Lebanon. In other countries, the need for capacity development seems to persist, as in Morocco, Jordan and Algeria. EUDs consider that the objectives are interrelated and should be treated differently in each country.

The interlocutors at the EUDs recalled the relevance of the EU Priorities (2012 COM) of promoting a favourable environment (1) and the participation of the CS in public policies (2), noting, however, a deterioration of relations between the State and the civil society over the period and in all the countries, at different degrees. The 2011-2014 period is a period of strong instability but during which institutional reform processes were initiated, involving both a strong citizen participation but also mutual mistrust with the authorities (Tunisia, Egypt, Morocco). The period after 2014 is more characterised by political conservatism and a return to authoritarian practices to deal with civil society contest and the persistence of social movements (case of Hirak in Morocco)

Finally, the dynamics around the roadmap to have a common position with the Member States are very uneven from one country to another. Alignment is sometimes difficult to achieve because of the divergence of bilateral interests of some Member States with each other and with the objectives of the EU. Some EUDs encounter blockages in the roadmap development process, or reach minimal consensus with the Member States. For instance, in countries like Israel and Morocco, interviewed EUDs staff point out that EU Priorities 1 and 2 (2012 COM) are not considered as priorities by some Member States. In that case of clear strategic divergence between EU and MS, some interviewed EUD staff express their favour for a specific DG NEAR roadmap that could stand alone, applying the principle of differentiation and adapting the EU objectives or priorities according to the needs of the country and the CSOs. On the other hand, the alignment between EU and Member State objectives is way more important in Palestine.

Indicator 1.1b

The rationale for the evolution of EU objectives is presented in key policy and programmatic documentation.

During the period covered by the evaluation, the EU experienced several cycles of cooperation policy with its Neighbourhood South (ENP South), the years 2011-2012 being a major turning point regarding the EU engagement with civil society.

The EU's objectives are defined through various policies and EC communications which are then translated into instruments' regulations, some of them being thematic and global on development (NSA/CSO-LA¹²³), human rights (EIDHR) and peace (IfS), others being geographical - bilateral and regional (ENP¹²⁴).

The 2010-2012 period is pivotal, leading to major change in EU global and regional policy related to CS support and engagement.

- Since 2010, EU has undergone major institutional changes with the foreign policy innovations introduced by the Lisbon Treaty, such as the creation of the European External Action Service (EEAS).
- On the meantime a new global policy on the involvement of civil society organisations in EC development cooperation was launched through a "structured dialogue", establishing in 2012¹²⁵ the Communication 492 - The roots of democracy and sustainable development: Europe's engagement with Civil Society in external relations.

¹²³ Establishment of EIDHR (reg. n°1889), NSA-LA (reg. n° 905) and IfS (reg. n°1717) instruments in 2006 and Establishment of IcSP, regulation n° 230 in 2014, Establishment of DCI, regulation n°233/2014

¹²⁴ ENP (COM/2003/104), Partnership for Democracy and Shared Prosperity COM 200, ENP South («immediate response»), A new response to a changing neighbourhood ENP Review COM (2011) 303, Delivering on a new European Neighbourhood Policy, EC (Joint 2012) 14, 2015 ENPI Review JOIN(2015) 50

¹²⁵ 'The roots of democracy and sustainable development: Europe's engagement with Civil Society in external relations', COM (2012) 492 final

- In 2011/2012, the EU had to promptly adjust its policy to respond to the political and institutional evolutions of ENP South country partners ('Arab Spring').

We can then distinguish three periods in which the EU's objectives are presented in key political and programmatic documentation, with strong congruence between these two levels. In each of these periods, there is a high degree of harmonisation of objectives between different policy documents, between thematic instruments and geographic instruments, throughout the period of the evaluation.

- From 2007 to 2010

Over the 2007-2010 period, two coherent and complementary strategies are set: the Euro-Med Barcelona Declaration at regional level (1995) and its bilateral Association Agreements and, since 2003 (COM), the European Neighbourhood Policy and its bilateral Action Plans.

The political priorities of the ENP are defined every five years by the heads of state at a Euro-Mediterranean summit. Then, the Regional Strategy Paper define the content of the five-year work programme, which is translated into Country Strategy Paper (multi-years) and EU/Partner Country Action Plans¹²⁶. These are negotiated with each of the partner countries, under which the European Union gradually enables them "to participate in its market, receive financial assistance and have input to its policies"¹²⁷, in exchange for the adoption of a negotiated reform agenda leading to the conclusion of Association Agreements, along with Deep and Comprehensive Free Trade Area agreements.

The Action Plans provide a point of reference for the programming of assistance and engagement with civil society. Between 2007 and 2010, the EU engagement with Civil society was mainly considered in the "Political, economic and social reform" and the 'People-to-People Contact' Priority Sectors¹²⁸. Thematic instruments such as NSA-LA and EIDHR were the main channel for support to CSOs and their objectives were incorporated in the Action Plans. People to people contact was mainly achieved through the Anna Lindh Foundation, set up in 2005 by the governments of the Euro-Mediterranean Partnership¹²⁹. The ALF operates as a network of civil society organisations dedicated to promoting intercultural dialogue in the Mediterranean region.

- From 2011 to 2014

In the context of the Arab uprisings in 2011, the EU launched two strategic review processes, one at the global level through the "structured dialogue for an effective development partnership" (2010), and the other at the neighbourhood level, starting with the South. The EU published first the communication 2011 'ENP South: Partnership for Democracy and Shared Prosperity' as an "immediate response" to the uprisings. Then, an ENP Review was established by COM (2011) 303, including the Eastern Neighbourhood.

Different sources¹³⁰ indicate that the 2011 popular uprisings in North Africa and the Middle East illustrated the limits of the EU's political approach to the Southern Neighbourhood, which was mainly based on stability and security concerns. Through its two communications, the EU has committed itself to promoting political reforms leading to "deep democracies" and to engage in a more structured manner with the "societies" of the region. The new policy considered that civil society should play a key role as a "driver of change" in terms of democratic governance and inclusive development. Democracy has become a clear priority in the policy documents related to ENP, instead of being presented as a common value. Reported progress on democracy determine the incentive-based approach for partnership – "More for more" – which has been intensified after 2011 through an umbrella fund. The enhancement of civil society participation in policy dialogue, reforms and policy making processes received more emphasis after 2011, as confirmed by the increasing number of sectors in which civil society is intended to be involved (EU-Partner Countries' Action Plans).

¹²⁶ ENPI, Regional Strategy Paper, 2007 – 2013 ; ENPI country strategy paper, 2007-2013: Morocco, Algeria, Tunisia, Egypt, Jordan, Lebanon ; EU Country Action Plan: 2007 – 2011: Morocco, Tunisia, Egypt, Lebanon, Palestine, Israel

¹²⁷ Perchoc, 2015. 'The European Neighbourhood Policy : an in-depth analysis', European Parliamentary research service

¹²⁸ EU Country Action Plan: 2007 – 2011: Morocco, Tunisia, Egypt, Lebanon, Palestine, Israel

¹²⁹ Evaluation of the European Union's Support to two European Neighbourhood Policy Regions (East and South), 2013

¹³⁰ Evaluation of the European Union's Support to two European Neighbourhood Policy Regions (East and South), 2013

At the global level and prior to this policy review at regional level, a ‘Structured Dialogue for an effective development partnership’ was launched in 2010 in Brussels. In line with the Global Aid Effectiveness Agenda, it was an inclusive process, bringing together all relevant stakeholders involved in EC development cooperation. This structured dialogue resulted in The COM (2011) 637 “Increasing the impact of EU Development Policy: an Agenda for Change”, building on lessons learned from thematic instruments, NSA-LA. Whereas poverty eradication remains the primary objective of development policy, “changes on a number of fronts are called for”, leading to the inclusion of new priorities, such as “human rights, democracy and other key elements of good governance” and “inclusive and sustainable growth for human development¹³¹”. The integration of democratic objectives into the EU's development policy is the first step in the broader evolution of the EU's cooperation policy in which the promotion of democracy through the participation of civil society will occupy a central place.

This occurs at regional level with the ENP revision in 2011 to provide a rapid response to political developments in the region. Two objectives – 1) provide greater support to partners engaged in building deep democracy, 2) support inclusive economic development” - align with those of the EU's development policy mentioned above.

In 2012, the EC communication “The roots of democracy and sustainable development: Europe's engagement with Civil Society in external relations” (COM 2012 - 492 final) sets out new objectives in support to civil society worldwide, which structures all EU policies from 2012 ahead : 1) enhancing efforts to promote a conducive environment for CSOs in partner countries, 2) promoting a meaningful and structured participation of CSOs in domestic policies of partner countries, in the EU programming cycle and in international processes as well as 3) increasing local CSOs' capacity to perform their roles as independent development actors more effectively. We can therefore see a convergence of objectives between ENP and NSA-LA with the “COM 492 2012 - The roots of democracy and sustainable development” - which places support for civil society at the heart of its external cooperation policy.

The EU's objectives of engagement with civil society - both globally and geographically - are perfectly coherent as policy documents refer to one another. The process of integrating the different instruments around common objectives has reached an additional stage with the revision of thematic instruments in 2014. The objectives of the CSO-LA in the DCI are, for example, almost fully aligned with those of the 2012 COM.

On the other side, the context of EU institutional change, with the Treaty of Lisbon entering into force in 2009, entails new mechanisms of policy making. The creation of the High Representative/Vice President of the European Commission (HR/VP) and of a new diplomatic service, the European External Action Service (EEAS), as well as the ending of the role of the rotating Presidency of the EU in EU foreign policy matters transformed the terms and modalities by which this foreign policy is implemented¹³². At policy level and as far as civil society engagement is concerned, this new apparatus has generated a human rights policy¹³³.

At the level of programming, the system of Action Plan of the ENP remains the same and prevails after 2012. The Annual Action Plans are the primary programming documents covering all areas of cooperation, including engagement with the CS.

Added to it are the Civil Society Roadmaps, that bring the EU and the Member States (MS) together to fix common framework of analysis and common priorities. It also serve as a barometer for the EU engagement with civil society in the countries, in line with the objectives of the COM of 2012¹³⁴. The roadmaps produce a detailed analysis of the civil society, addressing their institutional and political environment, their capacities, their relationship with the EU, the MS and the authorities of the country. They also set the EU's strategy for engaging with civil society. At global level, the CS Roadmaps are overseen by DEVCO. A taking stock study was conducted in 2015¹³⁵ and emphasised the weakness of the programmatic dimension, with priorities vaguely defined. The analysis of the first CS Roadmaps in ENP South countries leads to the same conclusion, which is also endorsed by the EUDs when interviewed.

¹³¹ COM (2011) 637 “Increasing the impact of EU Development Policy: an Agenda for Change”, building on lessons learned from thematic instruments, NSA-LA, p. 5 and p.7

¹³² Balfour, “The role of EU delegations in the EU Human rights policy”, DG-External Policies – Directorate B, Policy Department, 2013

¹³³ Ibid

¹³⁴ EU Country Roadmap for engagement with Civil Society, 2014-2017: Morocco, Tunisia, Egypt, Lebanon, Palestine, Israel

¹³⁵ EPRD, The EU Roadmap process: taking stock - Capitalisation report, Main Report and Annexes, 2015

- From 2015 to 2018

In 2015, the ENP was revised and other key policy and strategy documents¹³⁶ were produced in 2016. The report on the Implementation of the European Neighbourhood Policy Review, JOIN 2017 (18) indicates that “The Global Strategy will guide the EU's external action in the years to come, and the reviewed ENP is an important instrument to attain its objectives, particularly answering the need to enhance the resilience of states and societies to the South of the EU.”

Some sources¹³⁷ raised concerns that the proposed new priorities - "stability" for the ENP, "resilience", "shared interest" around the control of migration flows and the fight against terrorism - may correspond to a return to the situation that prevailed before 2011, when the promotion of democracy faded against common, economic and security interests in the region. This literature stresses on the continuity of the objectives of the EU's Neighbourhood policy over the period, around the concept of the “security complex” or the “security–stability nexus”, which would integrate the objective of promoting democracy (value) with the objective of external security (interest), as shows the presentation of one of the defined EU development priority (COM 2016) – “Peace” – which is directly associated with democratic issues (“peaceful and inclusive societies, democracy, effective and accountable institutions, rule of law and human rights for all”). In terms of democracy promotion, some authors¹³⁸ analysed the EU documents pre- and post-Arab Spring and concluded that the difference between the two eras is insignificant.

The study of the programming documents shows a continuity of the EU's engagement with civil society in line with the COM 2012, but in the context of differentiated relations from one country to another.

Indicator 1.1c

Consultations with civil society actors and organisations were used to inform the evolution of EU objectives.

The EU's objectives are not new and are rooted in the objectives in the policy documents regulating thematic instruments, and more specifically NSA / CSO-LA, which has a more organisational focus. Since 2007, the EU's policy making process has been based on consultation with civil society actors. These consultations increased in intensity throughout the period.

1. At the country level

It is important to recall that the EU's cooperation objectives are established primarily with the states in the framework of the Association Agreement and the single framework partnership. The Association Agreements constitute the legal basis for the EU's bilateral relations with all the countries included in the Southern Neighbourhood, with the exception of Syria and Libya.¹³⁹

¹³⁶ The EU Action Plan on Human Rights and Democracy (EEAS) in 2015, the Global Strategy for the EU's Foreign and Security Policy in 2016 (EEAS), and the COM 740 in 2016, “a new European Consensus on Development Our World, our Dignity, our Future”.

¹³⁷ Assem Dandashly (2018) EU democracy promotion and the dominance of the security–stability nexus, *Mediterranean Politics*, 23:1, 62-82

Balfour, 2012. “EU Conditionality after the Arab Spring”, *IEDMed/Euromesco*, 16 papers

Balfour, Fabbri and Youngs, 2012. Report on democracy assistance from the European union to the Middle East and North African, *Euspring*

Perchoc, 2015. “The European Neighbourhood Policy : an in-depth analysis”, *European Parliamentary research service*

Assem Dandashly (2015) The EU Response to Regime Change in the Wake of the Arab Revolt: Differential Implementation, *Journal of European Integration*, 37:1, 37-56

Teti, A., D. Thompson, & C. Noble (2013) “EU democracy assistance discourse in its new response to a changing neighbourhood”, *Democracy and Security*, 9(1–2), pp. 61–79

¹³⁸ Teti, A., D. Thompson, & C. Noble (2013) “EU democracy assistance discourse in its new response to a changing neighbourhood”, *Democracy and Security*, 9(1–2), pp. 61–79.

¹³⁹ The initialled association agreement with Syria before the violent crackdown on public demonstrations was never signed, while negotiations for an EU-Libya Framework Agreement have been suspended since 2011.

In the framework of the European Neighbourhood Policy, the EU and its southern partners (except Libya and Syria) have adopted bilateral action plans, partnership priorities or association agendas, reflecting the needs, interests and capacities of the EU and each partner. In this respect, the ENP assessments show a good alignment between the EU's objectives and the country's needs in the negotiations for the Association Agreement and the country strategies.

Consultation with civil society is mandatory, and is included in both policy documents and internal review mechanisms (see interview). The ENI Regulation does not specify how policy dialogue is to be implemented, but suggests that consultation involves civil society beyond national authorities and that the process is meaningful and led by the EU. Finally, CoTE CS produced a note on how to engage the EU with CS.

According to most of the country roadmaps, and confirmed by field visit and survey from the EUD/CSO, there is since 2012 a systematic consultation of CSOs before or during the drafting of key policy, programming or even technical documents: the annual ENP Action Plan and Progress Report, the Country Strategy on Human Rights, the local EU guidelines (Human rights defenders, violence against women). During the identification and formulation phase, CSOs are consulted to identify priorities that will be indicated in the guidelines of the Calls for Proposals (EIDHR, NSA-LA).

The CS roadmap development process in 2014 was also a consultation exercise with the CS. In varying proportions from one country to another, the consultation mechanisms were considered unsatisfactory by the EUDs themselves, the priority having often been given to coordination with the MS, constituting an equally important issue but a higher priority. While the CS roadmap was to be renewed in 2018 only Algeria and Palestine managed to design the second CS Roadmap in 2019. In Palestine, the EUD redoubled its efforts to structure the dialogue with the CS, which has been appreciated by CSOs who expressed satisfaction in the CS survey about the way the consultation for the CS roadmap was conducted. This new roadmap presents a more detailed set of priorities than the 2014 roadmap, with a greater focus on priorities and a greater attention to targets and indicators. Nevertheless, the absence of a monitoring and reporting mechanism for the roadmap, as discussed in the Annual Forum of EU Focal Points for Human Rights, Democracy and Civil Society in Brussels (March 2019), due in particular to the collective nature of the document implicating the MS, considerably reduces the significance of the document.

At a sectoral level, we have seen during the field visits to Morocco and Palestine that the consultations between the EU and the CSs were an effective exercise, systematically applied in the phase of public policy development and sectoral support (budget support).

When asked in 2019, CSOs of most of the countries are critical of how dialogue and consultations with CSOs are conducted. While it is recognised in the CS survey that efforts have been made to mainstream the participatory approach in identifying needs and consulting for programming, especially since 2011, the lack of diversity of actors, the formalism of the meetings (tick the box) and the absence of exchanges and follow-up after the consultations are also pointed out by respondents. For most civil society organisations interviewed and surveyed, the bureaucratic dimension of the consultations comes from the fact that they are not structured in a bottom-up approach, through methods that do not highlight the needs, strategies and experience of CSOs. They are rather structured according to the EUDs' need, using a language that is not always mastered by the CSOs.

For some interviewed EUDs' staff, what may appear as a formal Tick-the-box exercise comes from the fact that the CSOs do not seize the opportunity of these meetings to raise topics of interest. Others recognise that consultations are carried out with limited means, gathering small number of capital-based organisations. In this context, CoTE-Civil Society issued in 2016 a specific document to help EUDs better engage with CSOs¹⁴⁰.

At the political level, there are regular consultations with CSOs through several mechanisms. First, CSOs are consulted on the EU's priorities for the EU-Country dialogue with the Government and are invited for briefings/debriefings when a meeting of the Subcommittee on Human Rights, Governance and Democracy holds. The Human Rights Working Group is another platform, consisting of bi-monthly meetings with Member States, chaired by the EU Delegation, where CSOs are invited on an ad-hoc basis to raise thematic issues. Less frequently, during High level visits/incoming missions, meetings are organised to facilitate dialogue with

¹⁴⁰ "Seven Tips for Meaningful Engagement of Civil Society Organisations in the Roll-Out of the European Neighbourhood Policy"

CSOs. They are also regularly consulted on a bilateral basis when new national legislation is being introduced or developments warrant consultations with civil society. This picture applies to the region with specificities by countries and periods.

The field visit to Morocco offers a highlight on the situation: The subcommittee has not been held since 2015. The diplomatic relations between the EU and Morocco have deteriorated around the question of the agreement on fishery products and products and its application to Western Sahara.¹⁴¹

The EU's political dialogue is then limited to the one with civil society and aims at documenting the situation of human rights and their violations. The context in Morocco has been characterised since 2015 by the protest movement in the Rif, by arrests of journalists and other CSOs representatives. In the absence of a dialogue on human rights and democracy issues between the EU and Morocco, the EU decided to make a rapprochement with the CNDH, which is an independent and constitutionalised public institution, in order to "convey messages".

In conclusion, the systematic nature of the consultations, the weakness of the allocated resources for them and its unilateral nature in the exchange of information suggest that these consultations are a tick the box exercise. EU consultations are not a priority for CSOs interviewed. They present a cost (travel and time) and are often technical and bureaucratic. For the EU, these consultations constitute a source of information and an important point of contact for the definition of priorities and objectives, and diplomatic positions.

2. Since 2012, the EU has been striving to build a structured dialogue at regional level

To assess the way civil society actors and organisations are consulted at regional level to inform the EU objectives, it is necessary to reconstruct the historical process of policy dialogue between the EU and the Southern and "Euromed" CSOs, through the different mechanisms that sequenced the evaluation period into three phases.

1.1 The first phase, 2007-2010, corresponds to the dynamics around the Euromed Civil Forum and the Euromed CS Platform. The Forum was implemented independently through civil society conferences that accompanied all Euro-Mediterranean conferences at ministerial level since 1995 and until 2010, within the framework of the Euromed Partnership (EMP) (Barcelona Process 1995). It was coordinated and organised by the Euromed CS Platform, a CSO-led network supported by the EU and France (HQ in Paris). Its objectives focused on the Intercultural dialogue between the South and the North, the reconciliation between societies in conflict, the critical observation of the EMP and the political challenge of authoritarian regimes, making this Platform take on a watchdog role¹⁴². The goal of the CSOs establishing the Platform - as presented during interviews with the founders involved during this period¹⁴³ - was also to thwart the influence of the GONGOs, considered as supported by the EU through the Anna Lindh Foundation, set up in 2005 by the governments of the Euro-Mediterranean Partnership and operating as a network of civil society national networks dedicated to promoting intercultural dialogue in the Mediterranean region.

Each forum gave rise to a critical and independent declaration on the sensitive themes of the EU's Euromed policy: the control of migratory flows, the liberal model of economic development through free trade agreements, the violation of human rights in countries that are part of the EU's Neighbourhood policy¹⁴⁴. This first phase ended in 2010 due to a lack of funding and political back up, in a context when the Union for the Mediterranean (initiative of the French Presidency) was gradually replacing the EMP¹⁴⁵.

¹⁴¹ According to the EU, the agreement should not concern the regions of Western Sahara, considered by Morocco as its southern provinces, while they are non-self-governing territories according to the UN, whose legal status is not always defined since Spanish decolonization in 1976.

¹⁴² Annette Jünemann, The Forum Civil Euromed: Critical Watchdog and Intercultural Mediator in: Panebianco, Stefania (Hrsg.): A new Euro-Mediterranean Partnership Cultural Identity. Franc Cass, London 2003, S. 84-107

¹⁴³ interviews during the CSForum-South in Brussels, November 2018

¹⁴⁴ Final declaration of the Marseille Euromed Civil Forum 2008: Circulating and living together in the Euromed space ; Final declaration of the Alicante Euromed Civil Forum 2010: International law must prevail over the balance of power

¹⁴⁵ Interview with Michel Tubiana, former President of the Euromed Rights Network and former coordinator of the Euromed CS Platform at the CS Forum South in Brussels, November 2018

1.2 The 2011 - 2014 period is characterised by multiple structured dialogue initiatives at the global level. Each policy / instrument establishes its own dialogue mechanism with a comparable *modus operandi*, and based on the European civil society networks structured around EU policy (Concord, HRDN, EPLO). This period also corresponds to the entry into force of the Treaty of Lisbon in 2009 and the progressive institutionalisation of the neighbourhood policy¹⁴⁶. The question is, given the situation of the Southern Neighbourhood countries and their civil societies, whether these thematic and global civil society dialogue mechanisms can inform the objective of the EU according to the needs of civil society in the ENP South Region. For this, it is necessary to consider the way in which the dialogue is structured, the level of representation of the CSOs of the ENP-South countries and the way in which they are mobilised.

- Civil society dialogue mechanism advancing Development policy: The Policy Forum on Development

In 2010, the Structured Dialogue for an effective Development Partnership was launched in the form of an inclusive and consultative process of great magnitude. It institutionalises a dialogue space through the Policy Forum on Development. It is structured¹⁴⁷ around a task team of rotating members (according to interest and capacity) and a full member general entity, composed by a multi-stakeholder group of CS and public sector actors. As the European civil society network on development, Concord is an active member. The secretariat is ensured by a TA team. Although the Forum has a global coverage and does not break down into regional forums, the Arab NGOs Network for Development (ANND) is seated in the task team. Established in 1997 in the context of the Barcelona Process, ANND works in 12 Arab countries with nine national networks and with an extended membership of 250 local CSOs and 23 international NGO members. It is the main actor of the dynamics of EU/CS dialogue at regional level since its creation.

This form of dialogue corresponds to a model in which the dialogue is structured by the UE and the intermediary of a TA. The stability of the stakeholder CSs represented is a guarantee of continuity, capable of producing effects over time. The disadvantage is that it takes the form of a vertical information exchange relationship with the EU, and may appear as a tick the box exercise, rather than a space for policy co-making¹⁴⁸.

- Civil society dialogue mechanism advancing Human Rights and Democracy policy: The EU-NGO Forum on Human Rights

In 2012, the approval of the first Strategic Framework on Human Rights and Democracy reinforced the role of the EU-NGO Forum on Human Rights established in 1998. It is an annual conference that provides a venue for direct interaction and discussion between representatives of global civil society and the EU institutions, EU Member States and international organisations on various topics related to the promotion and protection of human rights. The Forum is jointly organised by the European External Action Service and the European Commission in conjunction with the Human Rights and Democracy Network (HRDN). The Annual global forum is structured around an overarching theme¹⁴⁹. The objectives are (i) to explore and exchange experience in each region in relation to one core human rights challenge; (ii) identify actions that can be taken forward and properly followed up, by the EU, member states, civil society and other actors; (iii) review related thematic areas and identify methods to counter the current human rights crisis, at both a political and practical level; (iv) identify ways to better communicate EU work; (v) set a long term strategy in cooperation with EU, Member States and Civil Society¹⁵⁰.

¹⁴⁶ Steven Blockmans, Hrant Kostanyan, Artem Remizov, Linda Slapakova, Guillaume Van der Loo, 2017. "Assessing European Neighbourhood Policy Perspectives from the literature". Study commissioned by the Policy and Operations Evaluation Department of the Ministry of Foreign Affairs of the Netherlands, CEPS, Brussels/Rowman and Littlefield International, London

¹⁴⁷ Juan E. Nicolas, Concept paper on issues to be addressed and choices to be made for the definition of a governance and management model to enhance regional civil society-related dialogue in the ENP South, CS Facility South, 2015

¹⁴⁸ Interviews with Jacques Perrot (DEVCO) and ANND Chairman

¹⁴⁹ civil society shrinking space in 2015 (17th session), "United against all forms of Torture - applying a cross-cutting perspective to prevent, prohibit, and redress torture globally" in 2016, "Human Rights under threat" in 2017, "Defending universality – Making Human Rights a Reality" in 2018 (20th session)

¹⁵⁰ EU-NGO forum on HR and Democracy, websites of the 17th-20th sessions

At first and as for the other forum on development, the regional dimension was feebly regarded. The EMHRN - the main civil society human rights platform in the MENA region¹⁵¹ - participated in the first editions, inviting some of its members from North Africa according to thematic. The format changed in 2017, considering geographic working groups as a starting point for the discussions over a particular theme of concern in the region. For the Middle East and North Africa, the theme was “tackling the causes and effects of social and armed conflicts”. This format was applied in 2018 but the forum had a low participation of the ENP South CSOs due to an exceptional scheduling conflict with the CSF South.

- Civil society dialogue mechanism advancing Peace and Stability policy: the Civil Society Dialogue Network

Finally, the establishment of IcSP in 2014 led to the creation of a dialogue mechanism, the Civil Society Dialogue Network (CSDN), between civil society and the EU policy makers on issues related to peace and conflict. It is co-financed by the European Union (IfS / IcSP) and EPLO, and managed by the European Peacebuilding Liaison Office (EPLO) in co-operation with the European Commission (EC) and the European External Action Service (EEAS). EPLO is, like HRDN or Concord, a European network of civil society specialising in conflict transformation issues. Unlike the other two thematic dialogue mechanisms with the SC, which mainly take the form of an annual conference, the CSDN is developing a much broader set of activities, all aimed at informing EU objectives through activities: publications, conferences and seminars, and training.

Regarding the countries of the region several geographical meetings were organised: between 2011 and 2014, it was more about the theme of the transition following the Arab Spring, while after 2014, the meetings focused exclusively on the Syrian conflict. It is noteworthy that no activity has been conducted on the Israeli-Palestinian conflict, due to the existence of successive regional Peace Programmes dedicated to it and targeting civil society.

Consultation with CS was also conducted for the establishment of the IcSP instrument and is even institutionalised by the Civil Society Dialogue Network through the different types of activities led by EPLO, including Policy Meetings, Geographic Meetings, Early Response Meetings and In-country Dialogue Meetings, Funding Instruments Meetings, Member State Meetings, the EU in International Peacebuilding Meetings and training Seminars.

The EU relies on European networks of NGOs and by extension on their members to be able to mobilise and select relevant CSOs from the countries concerned. The dialogue is structured by the EU according to its agenda. The European networks implementing the activities are in a situation of having to respond to the needs of the EU, as was expressed by all the people of these networks interviewed.

1.3 The 2014 – 2017 phase corresponds to the resumption of the South Regional Dialogue through the CS Forum South established by the Civil Society Facility Instrument under ENPI/ENI. This forum has a ‘classic TA approach’¹⁵², whose model and objectives are inspired by the experience and lessons learned from the CS Forum East, endorsed in 2009.

The 2015 study addressing the governance and management models to enhance regional civil society-related dialogue in the ENP South shows that “the main difference with the ENP South context is that, in the East, there are clear political mandate and goals, and the Forum has been structured mirroring the political instances in place. Moreover, dialogue at a national CS level was already on-going before the Forum was launched, the situation in this regard being more advanced than in the ENP south.”¹⁵³

¹⁵¹ Created in 1997 in the context of the Barcelona Process, Euromed Rights Networks is the broader Euro-Mediterranean networks of civil society on human rights issues and the main CS stakeholders in the dynamics of EU/CS regional dialogue since its creation (along with ANND)

¹⁵² Juan E. Nicolas, Concept paper on issues to be addressed and choices to be made for the definition of a governance and management model to enhance regional civil society-related dialogue in the ENP South, CS Facility South, 2015

¹⁵³ Juan E. Nicolas, Concept paper on issues to be addressed and choices to be made for the definition of a governance and management model to enhance regional civil society-related dialogue in the ENP South, CS Facility South, 2015

In 2015, the EU undertook extensive consultation for the ENP review, using several channels, including online consultation, the CS Forum South and receiving more specific contributions from the main regional and European civil society networks (EMHRN¹⁵⁴, Solidar¹⁵⁵).

In 2017, DG NEAR launched a call for proposal for a grant contract aimed to developing a regional hub, meaning to take over and lead the regional structured dialogue that had been previously steered by the TA of the CS Facility. This indicates a shift in the model adopted as the grant-based model gives more flexibility to the grantees to better shape the dialogue.

Judgement Criterion 1.2: The EU's approaches to supporting and engaging with civil society have evolved effectively in line with the needs of civil society actors over this period in each of the regions under evaluation

1. Before 2011, in the context of authoritarian regimes as a dominant model in the south shore of the Mediterranean, thematic and global instruments - NSA-LA and EIDHR – were key for the EU to engage with civil society through targeted support. The introduction in 2007 of the Non-State Actors and Local Authorities instrument in the region was seen “as a significant shift in the EU’s democracy promotion strategy in the European neighbourhood”¹⁵⁶. They have proved over the period to be instrumental to support CSOs as they do not depend on bilateral relationships. Each instrument has its own specificity: the focus is more on inclusive development and consultation process between state and non-state actors at the local level for NSA / CSO-LA, whereas it is rather placed on the protection of rights and the support of human rights defenders for the EIDHR. EIDHR is theme-oriented while NSA/CSO-LA is more actor-oriented.

Over the period of the evaluation, action grant through calls for proposals is the main modality of financial support to CSOs, aimed to ensure transparency and equal treatment, in due respect to the financial regulation. On the other side, there is also a clear consensus, to recognise that the conditions of access to these grants can only favour organisations with a high initial level of management capacity (result-oriented project and administrative and financial management, communication). The procedure is so complex, and the level of requirements are so high that only a minority of CSOs can meet them. Among them are the INGOs, which are often criticised by national CSOs for being in a position of unfair competition with them. In some countries, intermediate national CSOs were formed already before 2007, especially in Palestine, in Lebanon, and to a lesser extent in Morocco, channelling EU funding to local organisations. The procedures for obtaining EU grants are appropriate for these national and international intermediary organisations, qualified by the EU as the “usual suspects”. They are nevertheless indispensable for channelling funds towards the targets, given the complexity of EU rules and procedures. These organisations are those able to implement sub-granting mechanisms, incorporated in action grants contract. This is the only way for the EU to extend financial supports to more organisations.

The other modalities of implementation available to EUDs are modalities that support more organisations than projects, involving the construction of a more strategic partnership with the EU. The financial support is co-defined between the two partners as part of a direct award, without call for proposals. Although little used, this type of modality, mainly operating grants, have been tested more recently, in Morocco and Palestine, with associative platforms engaged in political dialogue. These modalities have been highly relevant and appropriate for addressing EU objectives set after 2012, especially regarding policy dialogue and participation. The Partnership Framework Agreement is a more recent modality and have never been experimented in the region.

The EU's engagement with the CS during this period 2007-2012 is understood in the framework of capacity development including a combination of action grants and non-financial activities as the envelope allocated per thematic instrument (especially NSA/CSO-LA) includes the possibility of carrying out capacity development activities such as training courses, information sessions, workshops or seminars. These are one-off activities, described as support measures in the

¹⁵⁴ EMHRN ‘White Book’ in view of 2015 ENP revision, 2015

¹⁵⁵ SOLIDAR, the Euromed NGO Platform and The Arab NGO Network for Development (ANND), 2015. Key Principles for a Revised European Neighbourhood Policy, Briefing #73

¹⁵⁶ Blockmans, Kostanyan, Remizov, Slapakova, Van der Loo, 2017. “Assessing European Neighbourhood Policy Perspectives from the literature”. Study commissioned by the Policy and Operations Evaluation Department of the Ministry of Foreign Affairs of the Netherlands, CEPS, Brussels/Rowman and Littlefield International, London

CSO-LA and EIDHR Instruments, complementing the action grants. The use of these activities varies from one country to another. The capacity development objective is geared towards the institutional capacities of CSOs, understood as the ability of CSOs to apply for EU grants and absorb them.

As for regional programmes, they have also shown their relevance and have proved appropriate to address sensitive issues that could not have been addressed bilaterally, to integrate CS into sectorial cooperation and to facilitate dialogue between CSOs and national authorities. Severe limitations in reaching out to CSOs have been identified, mainly due to regimes' controls on the institutional set up of the programme.

2. Since 2011, and facing the turmoil of the Arab world, The EU has diversified and implemented a wide range of engagement and support channels, developing new engagement activities fully dedicated to civil society through an integrated approach, aligning with the 3 objectives of the 2012 COM.

For this, the EU has been able to rely on the Incentive-based funding mechanism, strengthened by the ENP revision in 2011 and 2012, and operating the "more for more" principle, which consists of rewarding progress made by a Partner Country in the area of democratic reform, by increasing the EU financial engagement. The EUDs contribute to the targeting and the diversification through the use of several vectors at their disposal, notably by using more systematically mapping at the beginning of their programming exercise.

As for the diversification, the analysis of the samples formed for this evaluation shows that the EU succeed to translate principles into actions as it delivers support to a wide range of organisations, in line with its broad understanding of the concept of civil society.

New CS comprehensive support programmes have in common to offer a wide range of activities and services to civil society from a capacity development perspective, in order to achieve the EU's objectives, and with a focus on non-financial activities, such as training, networking, and facilitation of consultation between CSOs and public authorities. Some programs have incorporated a sub-granting financial mechanism and others have established local offices to decentralise the action and be closer to the interactions between civil society and state actors.

Given Israel's annexation of East Jerusalem since 1967, the EU has launched a self-standing programme for East Jerusalem, specifically targeting CS. The main modality is the grant action but by direct award and not by CfP

In the context of the EU / CSOs policy dialogue, the representation / representativeness of CSOs is a permanent issue. The dialogue has been structured around several successive mechanisms. TA model of the CSFS, from 2014 to 2017, mobilised CSOs from the databases of EUDs, thus mechanically targeting funding recipients. With the Majalat programme since 2018, the historical CS regional networks have taken centre stage and mobilise their affiliates, including, in some countries, a new generation of activist and advocacy organisations

Indicator 1.2a	The appropriateness of the targeting of engagement activities, including outreach and diversification questions
<p>Since several indicators deal specifically with consultation as engagement activity, we will approach this indicator mainly through the targeted supports by instrument - thematic, bilateral and regional - and the evolution of targeting during the period covered.</p> <p>1) Before 2011</p> <p>Half of the regimes were authoritarian (with Libya and Syria being qualified as dictatorships) and had been politically highly stable before 2011. In these contexts, civil societies were generally divided between a contesting space of opposition to the regimes by referring to human rights and democracy, and a controlled or even</p>	

regime-fostered space for inclusive development¹⁵⁷. It should be noted that, in the Middle East countries, where many religious minorities coexist, civil society organisations are predominantly faith-based.

In the majority of countries in the region (Morocco, Tunisia, Egypt, Palestine, Israel, Lebanon and Jordan), CSOs are in 2007 important service providers, facilitating access to basic social services, rights or opportunities for marginalised populations. Among these organisations, some advocate for the promotion and defence of democracy and human rights vis-à-vis their government, within the limits of the political and institutional framework defined by each regime: "red lines" policies, mechanisms of prior authorisation, gap between repressive legislation and applied tolerance. Considering the political history of the countries of the region, one of the common features of the associative movement is that the field of human rights and promotion of democracy was first invested in the 1980s and 1990s by political activists, with liberal democrats and leftist militants on the other, both fiercely anti-Islamist. This investment of political activists in the CS was all the stronger as the political spaces were closed. For its part, the Islamist movement, generally constituted in opposition to the regimes in place, have experienced periods of rise, of intense repression, or of lull due to their progressive institutionalisation or to the tolerance of the authorities.

In most countries of the region, there is a great tradition of framing associative action as an operative modality of the welfare state or in the context of development policies as a source of legitimisation in the international arena. Public funding of CSOs in the countries is established in minimal proportions and according to political modalities (clientelism). In the multi-religious countries of the Near East, there is an old tradition of social action, autonomous from the state, and based on solidarity mechanisms specific to religious communities.

In this context, the EU's support and engagement activities with CSOs from 2007 to 2011 are aimed above all at encouraging the access of independent organisations to funding, in order to give them the means to be a real lever of change for development, democracy and human rights. These activities structure the relationship between the EU and civil society around a donor-beneficiary relationship.

Thematic and global instruments - NSA-LA and EIDHR – are specifically designed and utilised to engage with civil society through targeted support. The introduction in 2007 of the Non-State Actors and Local Authorities instrument in the region was seen "as a significant shift in the EU's democracy promotion strategy in the European neighbourhood"¹⁵⁸. They proved to be instrumental to support CSOs in a context where political authoritarianism prevailed in most countries in the south shore, since EIDHR and NSA-LA do not depend on bilateral relationships.

- As thematic and global instruments, EIDHR as well as the Instrument for Stability (IfS) in a lower extent, are seen as a useful and successful tool for supporting human rights¹⁵⁹. The key features of EIDHR are that it finances directly the organisations implementing the projects, without the prior agreement of host governments; since 2013 it can also support non-legal entities in specific circumstances, which represents an asset in countries where registration of NGOs or human rights organisations can lead to government persecution, such as in many countries in the ENP South. It finances many of its activities through small grants, most through the Country Based Support Scheme (CBSS call). The EIDHR is seen as "being flexible, reactive, adaptable to changing circumstances, acting in a confidential manner, and providing tailor-made solutions"¹⁶⁰. These features make the instrument highly relevant to focus on sensitive issues, especially in hostile environments.

¹⁵⁷ Ben Nefissa, S. Abd Al-Fattah, N. Hanafi, S. Milani, C (ed.) 'NGOs and Governance in the Arab World', The American University in Cairo Press, 2005 ; ABU SADA, C. CHALLAND, B (éd.). Le développement, une affaire d'ONG ? Associations, États et bailleurs dans le monde arabe. Paris – Beyrouth – Aix en Provence : Khartala – IFPO – IREMAM, 2011, Bozzo, A. Luizard, P-J. (ed.). Les sociétés civiles dans le monde musulman. Paris : La Découverte, 2011

¹⁵⁸ Blockmans, Kostanyan, Remizov, Slapakova, Van der Loo, 2017. "Assessing European Neighbourhood Policy Perspectives from the literature". Study commissioned by the Policy and Operations Evaluation Department of the Ministry of Foreign Affairs of the Netherlands, CEPS, Brussels/Rowman and Littlefield International, London

¹⁵⁹ Thematic evaluation of the European Commission support to respect of Human Rights and Fundamental Freedoms (global), 2011, and External Evaluation of the European Instrument for Democracy and Human Rights, 2017

Balfour, Fabbr and Richard Youngs, 2012. 'Report on democracy assistance from the European union to the Middle East and North African', Eusprings, Balfour, "The role of EU delegations in the EU Human rights policy", DG-External Policies – Directorate B, Policy Department, 2013

¹⁶⁰ European Parliamentary Research Service (EPRS), 2018. The EU external financing instruments and the post-2020 architecture European Implementation Assessment Study

- NSA-LA, and then CSO-LA (DCI), is a unique actor-based instrument, focusing on the work of development and governance actors, deemed to be closest to the citizens and therefore better placed to produce concrete results on the ground, including at grassroots level, and in marginalised areas, including in fragile, crisis and conflict affected contexts¹⁶¹.

Each instrument has its own specificity: the focus is more on inclusive development and consultation process between state and non-state actors at the local level for NSA / CSO-LA, whereas it is rather placed on the protection of rights and the support of human rights defenders for the EIDHR. EIDHR is theme-oriented while NSA/CSO-LA is more actor-oriented.

Though we will study in more detail the funding and implementation modalities in the following indicator, action grant through calls for proposals is the main modality as confirmed by all EUDs interviewed, in due respect to the financial regulation. calls for proposals is the main modality utilised over the past period aimed to ensure transparency and equal treatment. Supporting projects rather than organisations allows to dismiss possible criticism of acting through favouritism or a political agenda, since the results-based management imposed in the CfP guidelines leads to the selection of the best projects according to objective criteria and indicators.

On the other side, there is also a clear consensus among the documentation reviewed and the different stakeholders interviewed, be they from the EU, the EU and non-EU donors, and CSOs themselves, to recognise that the conditions of access to these grants can only favour organisations with a high initial level of management capacity (result-oriented project and administrative and financial management, communication). The procedure is so complex, and the level of requirements are so high that only a minority of CSOs can meet them.

Among them are the INGOs, which are criticised for being in a position of unfair competition with national NGOs. This may be the case in countries where civil society has strong capacities, such as in Palestine. But support for civil society through INGOs is also part of a capacity building approach: any grant to an INGO must include at least one local CSO as a partner. Many INGOs have developed a partnership approach involving a long-term relationship between organisations beyond a contractual engagement around a given action. We will see in the other judgement criteria that this has contributed to producing long-term effects on the development of CSO capacities, in terms of service delivery, organisation and management, and political dialogue. This is particularly the case for INGOs specialised in a field of technical skills such as medico-social for Médecins du Monde (Palestine), child protection for War Child (Palestine), inclusion of people with disabilities for Handicap International (Multi), or street children for Samusocial International. For international development NGOs such as Oxfam, the transfer of skills is more focused on strategic, organisational and institutional capacities.

In some countries, intermediate national CSOs were formed before 2007, channelling EU funding to local organisations. They are able to manage the funds according to the required procedures and to develop projects in partnership with local organisations to submit proposals to the EU. This trend is old and very important in Palestine. In Morocco, this trend is present but to a lesser extent. The common point of this organisations is that they are structured in a network more or less formalised, ensuring a fund-raising functionality by linking local and international levels. Some adopt a coalitionist approach, as it particularly the case in Palestine. Few organisations based on this model of CSOs network - where organisations can develop projects and advocate together – can also be found in Morocco.

The procedures for obtaining EU grants are appropriate for these national and international intermediary organisations. When interviewed, these are less critical of procedures. They are qualified in the documentation¹⁶² and interviews at the level of the EUDs or Brussels as the "usual suspects". They are nevertheless indispensable for channelling funds towards the targets, given the complexity of EU rules and procedures. These organisations are those able to implement sub-granting mechanisms, as will be seen in the following indicator.

¹⁶¹ C(2018) 4569 final, Multiannual Indicative Programme for the Thematic Programme "Civil Society Organizations and Local Authorities" for the period 2018-2020`

¹⁶² "Seven Tips for Meaningful Engagement of Civil Society Organisations in the Roll-Out of the European Neighbourhood Policy"

On the other hand, there is a shared consensus between EU staff interviewed or responding to the questionnaire and CSOs interviewed, that CfPs are sufficiently open with broad spectrum of objectives and themes to encourage initiatives and proposals from organisations based on their strategies, their experience and their know-how.

It is also important to underline that the envelope allocated per instrument includes the possibility of carrying out capacity development activities such as training courses, information sessions, workshops or seminars. These are one-off activities, described as support measures in the CSO-LA and EIDHR Instruments, complementing the action grants. The use of these activities varies from one country to another. In some countries, it occurs on an ad hoc basis to meet a specific need or to cope with an exceptional situation (case of Tunisia in 2011). Otherwise, only the EUDs in 3 countries - Syria, Jordan and Palestine - have used this type of activity on a yearly basis, from 2007 to 2012.

The EU's engagement with the CS during this period 2007-2012 is understood in the framework of capacity development including a combination of action grants and non-financial activities (training). The capacity development objective is geared towards the institutional capacities of CSOs, understood as the ability of CSOs to absorb EU grant contracts. The EU's engagement offer is designed to meet the needs of the EU, namely to have sufficient CSOs informed and able to respond to CfPs and implement activities/deliver products. For example, training focuses on result-based project management, communication, administrative and financial management, and so on. information sessions clarify rules and procedures for responding to calls.

Regional programmes

As for regional programmes, they have also shown their relevance and have proved appropriate to address sensitive issues that could not have been addressed bilaterally, to integrate CS into sectorial cooperation and to facilitate dialogue between CSOs and national authorities (ALF)¹⁶³. The evaluation of the European Union's Support to two European Neighbourhood Policy Regions (East and South – 2013) pointed to severe limitations in reaching out to CSOs. It emphasises the institutional set up based on partnership with governments. It shows that the target group and main beneficiaries of the activities were “primarily decision makers”. Some programmes “did not concretely involve the stakeholders at grassroots level” or “were beneficial primarily to an élite”. “The target group of some programmes was not appropriate”. The report strongly recommends having a stronger outreach in the field.

The report highlights the fact that the development of government-sponsored organisations (GoNGOs) had been a growing trend during the 2007-2010 period since local governments were increasingly concerned by their relations with international organisations and image within the international community. The 2012 study produced by the DG External Services – Policy Department¹⁶⁴ emphasises that, “when supporting CSOs in the neighbourhood, the EU is increasingly confronted with the problem of GoNGOs – usually entities registered as NGOs with transparent albeit unofficial links with governmental institutions”. The creation of GoNGOs was an effective tool for controlling civil society and allowed governments to access international funding channels for development assistance¹⁶⁵. The evaluation of the European Union's Support to two European Neighbourhood Policy Regions (East and South – 2013) highlights “an ambiguous attitude of the Commission in relation to the selected management structure of some programmes vis-à-vis their goal to strengthen independent non-state actors in Mediterranean countries.” The ALF and Euro-Med Youth III are main examples. “The ALF is a “Network of (43 National) networks”, where national networks are often coordinated by a government-nominated institution with the power to filter out potentially undesirable CSOs. The Euro-Med Youth III programme management structure is

¹⁶³ Evaluation of the European Union's Support to two European Neighbourhood Policy Regions (East and South), 2013

¹⁶⁴ Bousac, J, Delcour, L; Řiháčková, V; Solonenko, I and Ter-Gabrielyan G, 'Improving the EU's support to CS in its neighbourhood, rethinking procedure, ensuring that practices evolve', DG-External Policies – Directorate B, Policy Department, 2012

¹⁶⁵ Indicative literature:

- Ben Nefissa, S. Abd Al-Fattah, N. Hanafi, S. Milani, C (ed.). NGOs and Governance in the Arab World, The American University in Cairo Press, 2005.
- Bozzo, A. Luizard, P-J. (ed.). Les sociétés civiles dans le monde musulman. Paris : La Découverte, 2011
- Tainturier, P. Associations and revolution in Tunisia. A local perspective, Doctoral Thesis in Sociology, Paris, CNAM-LISE, 2017.
- Bono, I. Le "phénomène participatif" au Maroc à travers ses styles d'action et ses normes, Les Études du CERI, 2010 (a), n° 166

decentralised to the responsible MEDA national authorities. This means that the national authorities are responsible for the selection, contracting, financial management and monitoring of the projects carried out by their national project promoters”.

2) Since 2011

The EU has diversified and implemented a wide range of engagement and support channels. The institutional innovations linked to the Lisbon Treaty have strengthened the role of the EU Delegations, particularly in the field of human rights and civil society support. This is in line with the objective to build a strategic partnership with civil society that requires enhanced skills of the EUD teams for that purpose. This need was identified in the study “The Role of EU Delegation in the EU Human Rights Policies” (DG External Policies, 2013), to which the EU responded by establishing the CoTEs in Brussels (DG NEAR) and Civil Society Focal Points in the EUDs, based on several mainstreaming experiences (human rights, gender).

In this context, the EUDs contribute to the targeting and the diversification through the use of several vectors at their disposal. Delegations are more systematically using mapping during to their programming exercise, which also increases their targeting capabilities¹⁶⁶. The evaluation report on EU CSO capacity development initiatives emphasises that “the process of reaching out to a more diversified set of actors was facilitated by the growing knowledge and internal capacity at EUD level regarding civil society”¹⁶⁷. To support this, the field visits highlight another element that may seem secondary but is of importance, is the fact that many local staffs of the EUD, (focal points but not only), had a career relating to civil society prior to joining the EU. They are also less subject to mobility than the international staff, contributing to stabilise the institutional memory and knowledge of the country's civil society and relations with the EU.

As for the diversification, the analysis of the samples formed for this evaluation shows that the EU succeed to translate principles into actions as it delivers support to a wide range of organisations, in line with its broad understanding of the concept of civil society. For this, it refines its targeting by population category (women¹⁶⁸, youth¹⁶⁹) or by type of organisation (media¹⁷⁰, trade-union¹⁷¹, chamber of commerce¹⁷², farmers’ organisation¹⁷³, Universities), whether at the bilateral or regional level, as illustrated by the interventions sampled for this evaluation (targeted and mainstreamed support). An interesting finding during the field visit to Israel is the EU support and the partnership with the Hebrew University of Jerusalem, hosting the Minerva Centre for Human Rights, which contribute to diffusing human rights

¹⁶⁶ EUD in Tunisia : ‘Rapport de Diagnostic sur la Société Civile Tunisienne, Mission de formulation, Programme d’Appui à la Société Civile en Tunisie’ Tunis, Mars 2012 ; Synthèse de la cartographie des interventions et des approches des partenaires techniques et financiers envers la société civile en Tunisie, Mission d’appui pour améliorer l’accès à l’information et l’efficacité des appuis à la société civile en Tunisie, contrat cadre Europeaid/127054/C/SER/multi, Avril 2013

EUD Jordan, 2010 : mapping study of the NSA in Jordan

CSFS 2015 : Mapping Study of Civil Society in Palestine, in Israel, Egypt, Jordan, Libya and Morocco

EUD Algeria, 2017 : Analyses ciblées et recommandations d’intégration sectorielle de la société civile dans les priorités du partenariat UE-Algérie

EUD Morocco, 2018 : Élaboration d’une cartographie fonctionnelle et dynamique de la société civile dans quatre régions du Maroc

EUD Israel – cf CS Roadmap referring to CS mapping study as a knowledge product supporting the programming process.

¹⁶⁷ Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South (2012 – 2016), 2016

¹⁶⁸ Regional, 2015, ENI: CSO WINS – Capacity-building in the Southern Mediterranean to Open Policy Dialogue and Monitoring for Women in Society Egypt, 2012, ENPI: Securing Rights and Improving Livelihoods of Women (SRILW)

¹⁶⁹ Regional, 2014, ENI : NetMed Youth

¹⁷⁰ Tunisia, 2017, ENI : Assistance technique principale pour le programme d’Appui aux Médias

¹⁷¹ Palestine, 2008, EIDHR: Protecting trade union rights and uniting efforts to influence socio economic policies

¹⁷² Lebanon, 2015, ENPI: Technical assistance to support promotion of social dialogue in Lebanon Regional, 2011, ENPI: TRESMED IV (since 2002) Regional, 2016, ENI: SOLID – South MED Social Dialogue

¹⁷³ Lebanon, 2015, CSO-LA: Raise the voice of Lebanese CSOs towards an inclusive and sustainable development in agriculture and environment field in North Lebanon Egypt, 2011, ENPI: Technical Assistance to the Support to Rural Development Programme

Palestine, 2017, ENI: Reform dialogue and Development of Markets, Value Chains and Producers’ Organizations

culture in Israel and provide a safe space in order to bridge together different type of Israeli stakeholders (Officials from the Ministry of Defence, Ministry of Justice, NGOs).

Facing the turmoil of the Arab world and engaged in a policy review process that leads to the COM 2012 which defines a set of objectives and modalities to engage with CS at the global level, the EUD has developed new engagement activities fully dedicated to civil society through an integrated approach, aligning with the 3 objectives of the 2012 COM. For this, the EU has been able to rely on the Incentive-based funding mechanism, strengthened by the ENP revision in 2011 and 2012, and operating the "more for more" principle. Thus, the SPRING programme and then, the Umbrella Fund were quickly triggered to launch first national programmes dedicated to civil society support: PASC in Tunisia, AFKAR in Lebanon, and SPRING in Egypt

These programs have in common to offer a wide range of activities and services to civil society from a capacity development perspective, in order to achieve the EU's objectives, and with a focus on non-financial activities, such as training, networking, and facilitation of consultation between CSOs and public authorities. Some programs have incorporated a sub-granting financial mechanism (AFKAR + TAICR in Lebanon, SPRING in Egypt, and recently Moucharaka in Morocco) and others have established local offices to decentralise the action and be closer to the interactions between civil society and state actors. (Moucharaka in Morocco and PASC in Tunisia). These mechanisms clearly allow EUDs to leapfrog in outreach and diversification.

It is important to note the iterative and experimental approach undertaken by the EUDs, the search for complementarity between the instruments and their commitment over time. Indeed, most countries have experimented and consolidated new approaches by seeking to build on lessons learned. For example, in Lebanon, the programme "Towards an active participation of civil society in the reform process" (ACTED, 2015), was programmed on the basis of a capitalisation of different programs / projects: the programs AFKAR launched in 2009 and completed in 2011 and 2012 as part of SPRING which focuses on creating synergies among CSOs working in the same field and between CSOs and the Government; and the projects supported under EIDHR on the protection of the rights of migrant domestic workers, as well as the capacity development activities of Beyond.

In Algeria, there is a strategic continuity in the EU's commitment, between the Michwar project, support for the Jousour programme and the launch in 2017 of the CapDel Programme on local development and participatory democracy, including a sub-granting component. This strategy must be revised following the peaceful protest movement that broke out in Algeria in 2019.

In Morocco, the launch of Civil Society Facility (technical assistance) has not only offered a number of capacity development services to CSOs but has also produced several studies to inform EU programming, leading to design and development of the Moucharaka programme. It should also be noted that the assistance provided by CoTE during the design phase was very much appreciated by EUD's staff. It seems indeed that the design of this programme is based on the good practices resulting from the lessons on the experiments carried out in the region. This programme is based on a decentralisation of the structure, with local offices (good practice of PASC) and on a financing mechanism based on priority themes (good practices in Lebanon).

3) Specific programme in Palestine : East Jerusalem and Peace Programmes

Given Israel's occupation of the Palestinian territories, the EU has launched a self-standing programme for East Jerusalem, specifically targeting CS. The EU's East Jerusalem programme (EJP) was created in 2007 with the aim of maintaining the viability of the two-state solution with "Jerusalem serving as the future capital of both States".¹⁷⁴ This was to be carried out by providing support to the Palestinian population of East Jerusalem with a focus on developing and supporting social services, and has since evolved to strengthening the resilience of the Palestinian residents of East Jerusalem and preserving the Palestinian character of the city. In this programme, the main modality is the grant action but by direct award and not by CfP. Plus, two thirds of the supported initiatives are carried by local or national CSOs, over a period of between 2 and 3 years and for amounts of funding between 1 and 6 million. The programme targets a total of 6 sectors: Protection

174 European Commission (2017), Financing Agreement ENI/2017/040-199

and Rule of Law, Education, Economic Development, Culture, Social Welfare and Community Development. The annual budget of the programme almost doubled between 2011 and 2017, from 8 to 14.9 million.

4) Regional Forum

In the context of the EU / CSOs policy dialogue mechanisms, the representation / representativeness of CSOs is a permanent issue. As for the Development Forum (Global), it is one of the main challenges reported¹⁷⁵, along with the accountability mechanisms of the Forum; “being a mainly political initiative without real mechanisms of M&E in place”.

The South Regional Forum has had several forms of representation and targeting in connection with the three phases of the regional dialogue that were outlined. During the first phase (until 2010), that of the Civil Forum Euromed, the participation of civil society came from activist organisations and networks, specialised in advocacy (EMHRN, ANND). Subsequently, the TA model of the CSFS, from 2014 to 2017, mobilised CSOs from the databases of EUDs, thus mechanically targeting funding recipients. With the Majalat programme since 2018, the historical CS regional networks have taken centre stage and mobilise their affiliates, including, in some countries, a new generation of activist and advocacy organisations (Tunisia, Lebanon, Morocco and even Algeria).

While the relevance of the regional level defined by the neighbourhood policy is often questioned, some civil society actors of the Maghreb countries, among the main bearers of the democratic thematic and human rights, consider the Maghreb as a relevant political space, in particular to increase the capacities of negotiations vis-a-vis the EU and its partners in general, and intend to promote its unification. These same actors helped to boost the Maghreb Social Forum (MSF), which has been held on a regularly basis since 2005, to work towards the gathering of Maghreb civil societies in the perspective of a united Maghreb (political objective) and fight against the development model based solely on the liberalisation of capital and goods exchanges (economic objective). While it was held regularly in Morocco, the MSF has been held in Tunisia since 2011 - where the issues of democratic transition, social movement in the Maghreb as in the rest of the world, as well as economic and social rights and migrants' rights are struggling. The EU has not, to our knowledge, taken part in the MSF, either as an intervenor or as an observer, and there is no mention at all of the MSF in the EU documentation, whereas it has been a major CSO fora, dealing with topics of interest for the EU. The organisers of the MSF, mainly the FMAS in Morocco and the FTDES in Tunisia, are part of the Majalat consortium. They are regularly supported by the EU.

Indicator 1.2b	The appropriateness of choice of implementation modalities
	<p>EUDs have a wide range of funding and implementing modalities to provide financial support to CSOs in a direct and indirect way:</p> <ul style="list-style-type: none"> ➤ Among the direct targeted support, we can find Action grant through call for proposal, direct awards in the crisis contexts like what we could notice in Palestine during our field trip, but also the operating grants and the Framework Partnership Agreements. ➤ Among the indirect support modalities, delegation agreements can be cited in the context of indirect management for organisations that integrate a direct support to civil society component. This is the case of United Nations agencies (UNICEF, UN Women Morocco, UN Habitat Sone C in Palestine), but also national institutions (Pro format in Morocco, + NHRIs). The other indirect support modality is the financial support to third parties, considered as the main cascading mechanism. <p>Action grants through call for proposal (CfP) is the main modality. As we have seen, this modality applies the principle of transparent competition based on objective criteria related to results-based project management. The EU does not support organisations but projects and seeks to select the best of them. This modality contributes to the emergence and development of intermediary organisations, termed "usual suspects" by the EU itself, capable of translating the languages of</p>

¹⁷⁵ Juan E. Nicolas, Concept paper on issues to be addressed and choices to be made for the definition of a governance and management model to enhance regional civil society-related dialogue in the ENP South, CS Facility South, 2015

grassroots organisations, administrations and donors. Smaller or emerging organisations routinely criticise these intermediary organisations for specialising in capturing EU funds at their expense. This type of criticism also takes place in a context of strong competition between CSOs, which is also sought by the call for proposals itself.

These usual suspects are the product of the rules imposed by the EU (and the community of donors at large) whose complexity and requirements prevent a direct relationship of financial assistance to smaller voluntary based organisations, in remote regions of the country. This observation has long been well documented and has been the subject of a special note prepared by the CoTE and distributed to the EUDs, to promote the use of different modalities to increase the EU's outreach capacity.

The main way to overcome this limitation is the possibility of operating Financial Support to Third Parties (FSTP). This modality is highly sought after by the EUDs in that it makes it possible to outsource the requirements of outreach and diversification to an intermediary, particularly in rural and remote areas, given the limited human resources of the EU. It has been successfully applied in Palestine, Lebanon, and Egypt, and to a lesser extent to Morocco and Algeria.

Sub-granting is also conceived as an integral part of organisational capacity development (learning by doing), particularly in the context of the new generation of comprehensive CS support programme. The requirements and conditions for operating this type of mechanism are complex and require high institutional capacity. Only the intermediary organisations that we mentioned above can meet the requirements, especially those that are networked with territorial anchors. The cascading funding then reaches out to organisations working at a territorial and local level. Some responses to the survey, however, highlight the idea that the final beneficiary organisations are rarely involved in project design, nor have their costs of structures funded, which prevent them from developing locally, whereas these costs are eligible according to EU rules. On the other hand, EUDs have a greater risk of loss of visibility on the sub-granted projects. However, we note the efforts made by the EU focal points, as recognised by the CSOs interviewed, to monitoring and field visits.

With regard to the other modalities, the observation is also made that their use is limited and this in spite of the orientations given by the CoTE. These are the operating grants and Framework Agreements. These two modalities imply a partnership relationship with the EU, which is no longer only contractual and based on the project approach, but on a more political partnership relationship with an organisation or group of organisations. They are in fact not designed to broaden outreach to CSOs and grass-root organisations, but rather to build in-depth and cooperative partnership with a single or a group of organisations (mainly coalitions/network/platforms). The EUDs resort to operating grants is limited because the conditions governing its use in the financial regulation are strict and conceive the operating grant as exceptional cases compared to the action grants through CfP as general rule. For the Framework Agreement, the restrictions are the same but other more tacit political conditions are added. Insofar as this modality envisages a long-term relationship structured around one or more EU objectives, the identity and the very nature of the organisation counts in the partnership. These two modalities are not project/action but organisation/policy-oriented.

The findings we have identified during the field visits to Morocco and Palestine show that recent operating grants have been tested to the benefit of CSO networks. Not only are the partners relevant according to EU objectives and EUDs strategy but EUDs and their partners appreciated the possibility of co-constructing the intervention and the possibility of funding organisational costs for the organisation. Nevertheless, the limit of the operating grants is the short duration (one year) and the lack of continuity. For some actors, they were an opportunity to recruit staff that a project approach would not allow it to do. But this recruitment is not sustainable. In Palestine, the proximity between the EUD and PNGO is very important: It is considered as one of the main associative platforms in Palestine by specialising on the inter-associative sectorial dialogue, with the authorities and with the EU. There is an important alignment between the positions of PNGO and those of the EU, especially with regard to the necessary shift between service and advocacy in CS support. A lot of analysis developed in the roadmap and the mapping reflect those developed by PNGO. A Framework partnership could be appropriate here. The examples of this type of modality are with the European networks of civil society structured by sector of intervention around shared interest in direct connection with the objectives of the EU (Concord, HRDN ...). But in the case of PNGO in Palestine, the political context of the Israeli occupation generates political risks: the fact that PNGO is a stakeholder in the BDS movement - the main Palestinian and international movement promoting civic disobedience towards Israel - and is targeted by the Israeli government as an anti-Semitic organisation in the framework of its diplomacy with notably the EU and the Member States. The talks with the latter show a strong pressure from their Chancery on the funding granted to Palestinian organisations.

The question of implementing modalities also arises for integrated and dedicated programs for civil society. Several modalities have been tested in the different countries: action grants in Tunisia (PASC) and Lebanon (ACTED), Technical assistance (CSF Facility, Regional and Morocco) and delegation agreement ("Moucharaka" in Morocco with UNOPS). These programmes are structured around several components / themes, with broad or multiple territorial coverage, and seeking to support the dynamics of citizen participation from local to national. They require strong institutional anchor and capacities, given the flagship nature of these programs. In this respect, the delegation agreement with UNOPS can be adapted. On the other hand, the focus on change dynamics will require strong territorial anchoring, deep knowledge on CS and know-how on coaching and capacity development. Action grant to relevant and experienced organisations could also be appropriate.

Finally, it is necessary to underline here the specificity of Palestine: the EUD did not develop comprehensive programs for the civil society but develops targeted programs in connection with a thematic or, in this case, a specific territory: The East Jerusalem Programme aimed to support the development of Palestinian communities and the promotion of civil society activism in East Jerusalem, covering areas from education to health to private sector development . Support to CS is done through Direct Awards, due to the crisis situation, as for the agency ECHO in the context of humanitarian disaster. As for the operating grants, the agents of the EUD and the partners appreciate this modality in that it allows a co-definition of the logics of intervention, allowing to forge more relations partnership.

Indicator 1.2c

The appropriateness of forms of engagement with civil society (targeted support, mainstreamed support, policy dialogue)

Beyond the concrete activities of EU engagement with the SC, interviews with EUDs' representatives show that the distinction between these three forms of engagement is unclear.

1. In CS road maps as well as in CoTE documents and other NOTE on mainstreaming, CS mainstreaming mainly consists of (i) systematic consultation with the CS in the EU programming cycle, and (ii) programming financial support for civil society, in the different thematic areas of the association agreement between the EU and the partner country (ENI). As financial support is mainly provided through action grants and CFP, the mainstreamed support does not differ here from targeted support.
2. These two modalities of CS mainstreaming (consultation and financial support at sectorial level) are intended to facilitate the rapprochement between state actors and CSOs and to promote the participation of these actors in the public policy process. This is called the policy dialogue support to CSOs, which, since then, is closely intertwined with the mainstreamed support, so much that it is difficult to distinguish the two.
3. Finally, many targeted supports are clearly geared towards policy dialogue.
4. Regardless the issues of classification (important for the intelligibility of action), the diversity of actions undertaken, whether financial or non-financial, whether they relate to specific priorities or to civil society as sector in its own right, makes it possible to act in convergence to achieve the objectives defined at the COM 2012 level.

All sources indicate that the conditions for the objectives achievement depend on the political and institutional environment and the space given to civil society, for its participation in the reforms and its collective structuring in an advocacy perspective. In this respect, the situation prevailing before the Arab uprisings does not seem to have progressed significantly. On the contrary, in many cases (Syria, Egypt, Israel), the situation has worsened. In terms of institutional change conducive to civil society, Tunisia is an exception since 2011, despite the many sequences of crises and political instability. The Algerian Hirak reminds every one of the unpredictability of events.

Therefore, the level of appropriateness of forms of engagement with CS needs to be assessed by considering contextual specificities and the level of openness and pluralism of regimes - criteria for assessing their authoritarian nature¹⁷⁶. While the forms of engagement are defined at a global level through the 2012 COM, their implementation is part of the country action plans, established through a dialogue with the partner country in application of the principle of differentiation and ownership. In countries with restricted civic space, mainstreamed support and policy dialogue are not taken into account, and targeted support focuses on the service provider CSOs¹⁷⁷. In transitioning countries or initiating a process of political reform, we can say that the forms of engagement are appropriate.

This gap between the ambitious goals of the EU and the unfavourable conditions of implementation of many countries in the region reflects to the regional dialogue with the civil society¹⁷⁸. On the one hand, the relevance of the regional dimension is regularly questioned by the participants of the Civil Society Forum South, given the national contextual specificities and the different possibilities of action among the CSOs, particularly in terms of advocacy and policy dialogue. On the other hand, the restriction of civic spaces - a common feature for the majority of countries - complicates the conditions for dialogue between the EU and the CS, in that it generates different expectations: the EU regards the CS as a driver of change and is in demand for inputs from civil society to guide its direct support action within the framework of ENP. On the other hand, civil society challenges the EU, less on its direct support than on its political and diplomatic action with authoritarian regimes that restrict public freedoms.

Indicator 1.2d

Consultations with civil society actors and organisations were used to inform the evolution of EU approaches.

We have not found evidence in the literature that consultations with the CS has informed the evolution of EU approaches. The latter (e.g. the strategic partnership with the CS) seems more the result of external factors, such as popular insurrections in most countries in the region.

The EU structured dialogue on development in 2010/2011 shows a fruitful attempt to draw on lessons learned from its own experiences and instruments, specially NSA/LA, to improve its approaches of engagement with civil societies, which have changed little in the period under review. The territorial approach developed under NSA/LA is now recycled in programmes promoting participatory democracy (Morocco, Algeria, Tunisia). The rights-based approach is adopted in numerous initiatives that combine rights protection through rehabilitation of victims of human rights violations), and right promotion through awareness raising and advocacy.

On the other hand, at the global and regional level, it can be assumed that the structured dialogues involving a high participation of CSO has contributed to changes in EU approaches, notably as regards the strategic partnership. The contribution of civil society also depends on the way in which this dialogue is structured. So far, it is clear from the CS Forum South and the other fora that the dialogue has been structured by the EU, consulting civil society on issues on its agenda¹⁷⁹.

While the EU has drawn on its own resources to tailor its responses to the events that were imposed on it¹⁸⁰, it seems that the EU has not stopped since 2011 to consolidate this response by refining its approach. This is done at country level and entails a large consultation with stakeholders.

¹⁷⁶ Linz, J. 'An Authoritarian Regime: The Case of Spain'. In: Allardt, E. Littunen, Y (eds.). 'Cleavages, Ideologies, and Party Systems. Contributions to Comparative Political Sociology'. Helsinki : The Academic Bookstore, 1964, pp. 291-342; Linz, J. Stepan, A. 'Problems of democratic transitions and consolidation. Southern Europe, South America and post-communist Europe'. Baltimore, Londres : Johns Hopkins University Press, 1996; Linz, J. 'Totalitarian and authoritarian regimes'. Boulder, Londres : Lynne Rienner Publishers, 2000

¹⁷⁷ EPRD, 'The EU Roadmap process: taking stock - Capitalization report, Main Report and Annexes', 2015

¹⁷⁸ Interview with participants of the CS Forum South in Brussel, Nov. 2018 and observation

¹⁷⁹ Juan E. Nicolas, Concept paper on issues to be addressed and choices to be made for the definition of a governance and management model to enhance regional civil society-related dialogue in the ENP South, CS Facility South, 2015

¹⁸⁰ Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South (2012 – 2016), 2016

EQ2 (Efficiency): To what extent has the scale of resources deployed been justified considering the changes/results produced? To what extent have efficiency gains, or losses, occurred?

Judgement Criterion 2.1: The scale of resources deployed for targeted support has been appropriate in each of the regions under evaluation.

1. Increased outreach to grassroots organisations

While the budget envelopes dedicated to targeted supports are generally increasing, the number of initiatives supported decreases. This shows a process of concentration: budgets allocated by contract increases, and grants are allocated to a limited number of intermediary organisations able to comply with EU requirements. Concerns have been constantly raised that the majority of funding for CSOs goes to larger organisations rather than to 'grassroots' organisations. The idea that "INGOs remain privileged" and that access to support remains limited for small NGOs, particularly because of the complexity of the procedures, is very significant and recurrent in the responses obtained. This is confirmed by grants allocation analysis that shows on a trend over the period to higher contracting with INGO as main applicants.

According to the EUDs, the most effective way to consider cost-efficiency, by reaching a larger number of actors, while limiting the increase in the workload at the level of the EUDs (as an alternative of Action Grant under direct management). Experience of sub-granting has been growing in the region and over the period, especially in countries where the capacity level of CS is high (Palestine, Lebanon, Morocco, Israel). The sub-granting mechanism is sought after by the EUDs for the positive cost/benefit ratio that it brings about but it also reinforces the role of intermediation of the interlocutors of the EUDs, able to carry sub-granting mechanism and more widely to channel EU funds.

In terms of outreach to grassroots organisations, the innovation of launching comprehensive support programmes to civil society has not only increased the resources allocated to the CS but improved the grassroots organisations' access to non-financial support, and sometimes to financial support. Regional programmes, due to improved design and outreach opportunities offered by the Arab Spring, have, for example, helped to better reach youth movements in some countries.

2. Pooled resources

The experience with pooled resources is mixed. The Trust Fund complements country actions that can be fragmented, but the support to the CS is nevertheless marginal. In terms of resource pooling, joint programming between the EU and the MSs is a formidable resource pooling mechanism in the service of collective strategy. It is particularly in place in Palestine and help mainstream and coordinate support initiatives to CS. Regional programmes can be seen as attempts of resources pooling and of amplification of the scope of intervention and support. Activities in countries through regional projects or programs are superimposed on other initiatives, providing additional support for thematic and bilateral instruments and complementing each other when they are well coordinated. In some cases, regional programs can be a real pooled resource, such as for Palestine and Israel, with Peace Program, which primarily target Israeli and Palestinian CSOs and their cooperation in a multi-sectoral approach.

3. Considerations of cost-efficiency

When questioned, the EUD staff indicate that the choices in the use of the instruments depend more on the relevance of the instruments compared to the needs of the interventions than considerations in terms of cost-efficiency. This is a criteria looked at all stages of programming and through the quality review process but it does not predominate when choosing one instrument or another. Relevance of the instrument, meaning its specificity, and sometimes the availability of funds are the key parameter for the EUDs. Nevertheless, the consideration of cost-efficiency is becoming more important: combining calls for proposals under the EIDHR and CSO-LA into one call and using the two-year planning process is one of the measures taken in that regard. Resorting to indirect management, delegation agreements, contract services and, to a lesser extent, TA, in order to increase allocated budgets and delegate management tasks to third parties is another trend

for better considering cost-efficiency. Finally, the design of CS support programme lead also to a better consideration for cost-efficiency as this has been the case in Morocco: The focal points in the delegations, with the support of the members of the CoTE, were able to experiment different approaches in the region by asking about the best use or the best mix of grant, technical assistance, and direct agreement / contract service , in line with the cost-efficiency criterion and the management and monitoring capacities of the EU.

While the CfP procedure is considered particularly burdensome for the EUDs staff, most of the CSOs encountered in the context of this evaluation (especially in Morocco, Israel, Palestine and at the CS Forum South) consider that the conditions and procedure for obtaining and managing the funds lead to inefficiencies for their organisation. Obtaining EU grants induces significant transaction costs, placing organisations in a situation of insecurity.

4. Institutional capacity of partner organisations

In line with the objectives of COM 2012, the desk review shows that the EUDs have developed a knowledge production system by more systematically using mapping exercise and identification missions, which contribute to better assess the institutional capacity of CSOs. The process of elaboration of the Civil Society Roadmap¹⁸¹ is also a valuable exercise generating a retrospective and prospective analysis and mapping EU and Member States interventions.

Indicator 2.1a	Extent to which the choice of modality, and their mix, led to increased outreach to grass-root organisations
<p>1. Outreach to grass-root organisations through Action Grants</p> <p>The question of the distribution of grants between beneficiaries, between national and international NGOs, as well as the issue of procedures are among the two negative aspects that continue to be raised by the CSOs surveyed in the Questionnaire or interviewed in country or at the CS Forum. The idea that "INGOs remain privileged" and that access to support remains limited for small NGOs, particularly because of the complexity of the procedures, is very significant and recurrent in the responses obtained. This is largely echoing the finding of most thematic evaluations conducted in the past: « Most local CSOs pointed out that EU financial procedures are too rigid, long and complicated, which may have contributed to some level of inefficiency in the overall implementation of activities. An important reason explaining that problem may also be the lack of adequate staff within local CSOs with the necessary English language proficiency. EU information sessions, conducted before implementation, only gave them a general idea of the procedures¹⁸²».</p> <p>On the other side, CBSS aims to increased outreach to grass-root organisation. Before 2011, concerns were raised that the majority of funding for CSOs goes to larger organisations rather than to 'grassroots' organisations¹⁸³[...]. Although the requirement that international NGOs work with local partners and the possibility of sub-granting were recognised as ways of ensuring that funds do reach national CSOs, concerns were raised by membership-based organisations that "this leads to competition amongst international NGOs to find reliable partners and competition amongst members to be included in proposals and during implementation." The development of CBSS could have suggested a better targeting of grass-root organisation after 2011. Nevertheless, financial support to international and European-based CSOs and international organisations, under thematic instrument, still outstrips that provided to local CSOs¹⁸⁴.</p>	

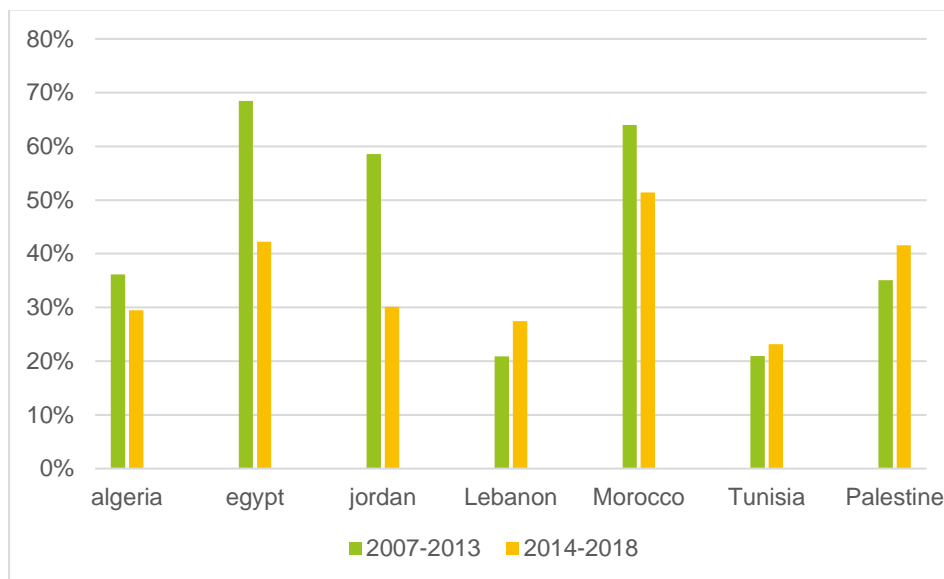
¹⁸¹ European Parliamentary Research Department (EPRD), The EU Roadmap process: taking stock - Capitalisation report, Main Report and Annexes, 2015

¹⁸² Review of the effectiveness of the EIDHR in Palestinian Occupied Territories (2011-2015), p.34

¹⁸³ Review of the effectiveness of the EIDHR in Palestinian Occupied Territories (2011-2015)

¹⁸⁴ EIDHR evaluation, interview with Jacques Perrot (DEVCO) concerning CSO-LA

Figure 6 Share of EU grants awarded to national or local CSOs as recipients/main applicants of EU grants



Source: Landell Mills' analysis of CRIS data

during the field visit have already used this mechanism, which confirms the analysis around a four-layered civil society, developed in the mapping and then in the roadmap, starting from local and grassroots, to the national and networks. The important use of sub-granting demonstrates a good articulation between the levels.

- This is less the case in Morocco where the national and the local levels of civil society are generally less interconnected, with the exception of a few historical organisations based on a federal model with local sections, or built on a logic of movement to welcome and support a variety of initiatives, bringing local and national level together.
- In Egypt, SPRING programme that foresaw a large sub-granting mechanism (70% of the grant) which has allowed building advocacy, project design/management and networking capacities of hundreds of grassroots organisations in six among the most vulnerable governorates in Egypt.
- In Algeria, The Michwar Project, and then Jousour - a programme developed by AFD according to a territorial and multi-stakeholder approach - have helped to increase the access of CSOs anchored in the territories to EU grants, as confirmed by interviews with CS Focal Point (Brussels 2019). It should also be noted that new organisations that have emerged in the last years through the support of the EU have initially gone through the structuring of civil society at a national level and then develop projects anchored in territories in connection with and in support of the local associative fabric. In Algeria, Sub granting is integrated into the new integrated programme of "participatory democracy" in Algeria

In Figure 6, three countries are not shown: Israel, Libya and Syria. These countries make up two different poles, with Israel on the one hand, where almost 100% of grants are granted to CSOs stably over the period, and on the other side, Libya and Syria, where almost 100% of grants are allocated to INGOs. This can be explained by the fact that Israel is a member country of the OECD, respecting the standards of the Rule of Law with regard to public freedom in Israel, with a highly capable civil society. The civil war situation in Syria and Libya is leading the EU to further support the interventions of INGOs. According to this graph obtained from the CRIS data processing, we can see that between 2007 and 2013, three countries - Egypt, Jordan and Morocco - had a civil society that captured around 60% of the grants allocated by the EU and three countries were in the range of 20% to 40%. Between 2014 and 2018, civil societies in 6 countries capture between 20% and 40% of EU grants. There is, therefore, a general trend in which INGOs capture most of the funding for support to civil society.

2. Sub-granting

According to the interviewees of the EUDs, there is an increasing use of sub-granting mechanism, which is, according to them, the most effective way of reaching a larger number of actors, while limiting the increase in the workload at the level of the EUDs.

Sub-granting is more particularly used in Palestine, which testifies to the level of capacity of civil society in this country in general. Many organisations met

- The 2016 evaluation report on CS capacity development initiatives also stresses on the role of EED to address grassroots organisations' needs, and on the positive effects of Regional programmes in that they "provided regional grants on sensitive areas (women empowerment, social dialogue, human rights, etc.) that cascaded down to a wide range of beneficiaries".

The sub-granting mechanism is sought after by the EUDs for the positive cost/benefit ratio that it brings about but it also reinforces the role of intermediation of the interlocutors of the EUDs, able to carry sub-granting mechanism and more widely to channel EU funds around.

3. Civil society support programme

The new generation of civil society support programme after 2011 has significantly increased the EU's outreach capabilities to grassroots organisations. Following the recommendations made in the various studies commissioned by the EUDs - mapping, evaluation - emphasising the importance of relocating the presence and action of the EU in the territories of the different countries and respond to criticism that the CSO beneficiaries were concentrated in capital. All of these programs were designed through territorial and thematic targeting. Some have set up local offices - like PASC and more recently in Morocco with Moucharaka. The PASC experience was judged positively on this point by the protagonists questioned in that the selection of local animators/facilitators in each of the offices, from the territories and the local associative fabric, allowed to accompany the citizens' dynamics in the territories, bringing them closer to the actions of the EU. Sub-granting mechanisms was the subject of considerable debate: the provision of non-financial services is considered appropriate in the context of the rapid development of the aid industry, which encourages opportunistic fundraising behaviour. On the other hand, access to finance is a component of capacity development. A financial support, which was initially planned within the programme, was finally withdrawn and a CfP was launched directly by the EUD without any link with the dynamics of the PASC.

4. Regional programmes

The evaluation report on the European Union's Support to two European Neighbourhood Policy Regions (East and South – 2013) drew attention to the trade-off/dilemma in the choice of the counterpart and of the management structure of projects, between efficiency and ownership objectives, and effectiveness: "While the arrangement whereby the national authorities are responsible for the selection, contracting, management and monitoring of the projects has proved to be positive from an efficiency and ownership point of view, such a choice contradicts the objectives of the programmes aimed at strengthening independent non-state actors. The situation since 2012 seems to have improved as the 2016 report on EU CSOs capacity development initiatives does not mention this dilemma. On the contrary, the report highlights significant progress in outreach to CSOs, since "regional grantees (such as We Gov!) and other support modalities such as the CSFS and the ALF have explicitly sought to encourage cooperation with CSOs, networks and resource people, based outside the capital, and in some cases outside major cities altogether¹⁸⁵". "This was a deliberate policy, often also reflected in the eligibility criteria of calls for proposals launched by regional grantees". These attempts to decentralise dialogue and cooperation initiatives is deemed instrumental to bring along gains in efficiency (e.g. lower cost of trainings) and to impact on local development processes.

This kind of efforts are confirmed by other regional programmes, especially those dedicated to youth after 2011, seeking to reach more informal and horizontal forms of organisation and mobilisation in order to be more in tune with the dynamics of the "social movement" in the countries of the region¹⁸⁶.

Youth has been a prime target for EU action since 2012, including regional programs. The Policy Dialogue Fellows Project supports the CS Facility South as an innovative initiative to build capacity and facilitate networking among young people (around 30 Fellows for the first phase) across the region to develop their policy skills and to interact with others. the decision makers in their countries and regional level.

¹⁸⁵ Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South (2012 – 2016), 2016

¹⁸⁶ Interim reports of the NetMed Youth programme (sample), and of the CS Facility, extracted from CRIS

This is also the case of the regional NETMED Youth program, which unlike the Fellows programme does not target individuals but youth organisations. In Morocco, the programme has been able to incorporate the main youth organisations, some of which had been strongly involved in the February 20 movement, or in the process of institutional reform launched by the King around the new Constitution and the institutionalisation of youth participation. The regional programme has provided a flexible country-level intervention framework to stimulate synergies between these organisations. Among the youth organisations met and participating in NETMED Youth, some have a strong reputation in Morocco because of their involvement with other donors (Friedrich Ebert Stiftung and USAID), and have always responded to the CfP of the EU without success, creating a strong frustration regards the relationship with the EU.

The 2016 report also emphasises that a number of opportunities to improve the efficiency of the regional interventions “were missed”, due to a lack of synergies between bilateral and regional programmes.

On the other hand, some innovations after 2011 have made it possible to better reach the grassroots organisation. The possibilities offered by EIDHR to support Human Rights Defenders (not only in the ENP South Countries but worldwide) have made it possible to reach grassroots and individuals in highly sensitive environments. Also, the partnership with the EED has allowed it to support emerging initiatives of civic movements in the region with flexibility and proximity that was not possible with other EU instruments. The degree of flexibility of EED is seen by most the partners as “key factor which lead to increase an effective accountability inside their young organisations”¹⁸⁷.

Indicator 2.1b	Extent to which pooling of resources has been utilised to achieve cost-effectiveness
<p>Traditional European resource pooling mechanisms are used as instruments of cooperation with partner countries but not with civil society, which, nevertheless, can benefit from it in the mainstreamed support framework or through indirect management of EU support to CS.</p> <ul style="list-style-type: none"> • Trust Fund <p>Trust Funds are a specific type of EU instrument, created to respond to emergency, post-emergency or thematic actions for a limited duration¹⁸⁸For that reason, it operates outside the traditional procedures. They have specific governance arrangements and are placed outside the EU budget. One of the illustrations we have identified is the ‘EU Emergency Trust Fund for stability and addressing root causes of irregular migration and displaced persons in Africa’, set up in 2015 by the EU and its member states to promote stability and economic opportunities and to strengthen resilience, within the framework of the Valletta Action Plan and in connection with the European Agenda on Migration.</p> <p>“The EUTF for Africa is a pooled fund of different EU funding instruments, mainly the European Development Fund, the EU budget, and contributions from member states and other donors”. DCI contributes to 10% and DG NEAR to 7%. The EUTF for Africa is structured around a Strategic Board whose member are contributors, and three Regional Operational Committees including one for North Africa. The EUTF for Africa projects are generally proposed by the EU Delegations and then selected by the Regional Operational Committees. The EUTF for Africa is a delivery tool that complements traditional EU development instruments and existing political dialogues. The nature of the projects is generally related to assistance to public and governmental institutions.</p> <p>The Trust Fund, which is a continent-wide resource pooling mechanism, complements country actions that can be fragmented (See indicator 3.2a: focus on migration sector in Morocco). The support to the CS is nevertheless marginal as it is not and is part of the process of CS mainstreaming, like sectoral support. The website dedicated to the Trust Fund shows that 4% of the funds in Morocco are granted to the CS. In all countries in North Africa, the Trust Fund supports the operationalisation of national migration policies through technical cooperation agencies (GIS, AFD, Expertise France ...) or provides humanitarian assistance as in</p>	

¹⁸⁷ Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South (2012 – 2016), 2016

¹⁸⁸ European Commission (2017). Communication from the Commission to the European Parliament, the Council and the Court of Auditors: Annual accounts of the European Development Fund 2016

Libya through IOM. The reference to civil society is limited and concerns its role as a service operator (e.g. reintegration of migrants in their country of origin, professional integration)

- Joint programming

In terms of resource pooling, the level of coordination between the EU and MS is key, possibly leading to joint programming.

The latter is a formidable resource pooling mechanism in the service of collective strategy. In Palestine, there is a perfect alignment between the strategies of the Member States, of the EU and of the PA, which served as a basis for joint programming. In Morocco, several sectoral convergences between the EU and the MS can be found, as shown by the practice of joint budget support¹⁸⁹, and recent attempt on joint programming (Programme de l'Egalité). Experience of joint programming is limited in this country as highlighted by the strategic evaluation of the EU on that subject (2011-2015)¹⁹⁰, which identified explanatory factors and stressed the importance of bilateral interests between Morocco and certain Member States.

- Regional programmes can be seen as attempts of resources pooling and of amplification of the scope of intervention and support.

Nevertheless, the effects occur primarily in terms of dynamics and political momentum at the national level. Activities in countries through regional projects or programs are superimposed on other initiatives, providing additional support for thematic and bilateral instruments and complementing each other when they are well coordinated.

In some cases, regional programs can be a real pooled resource, such as for Palestine and Israel, with Peace Program, which primarily target Israeli and Palestinian CSOs and their cooperation in a multi-sectoral approach.

Indicator 2.1c

Extent to which considerations of cost-efficiency played a role in the use of available instruments (geographical and thematic) and aid modalities.

When questioned, the EUD staff indicate that the choices in the use of the instruments depend more on the relevance of the instruments compared to the needs of the interventions than considerations in terms of cost-efficiency. This criteria looked at all stages of programming and through the quality review process, but it does not predominate when choosing one instrument or another. Relevance of the instrument, meaning its specificity, and sometimes the availability of funds are the key parameter for the EUDs.

As far as the use of aid modalities is concerned, the consideration of cost-efficiency is becoming more important as EUDs teams are faced with the problem of having very important financial co-operation envelopes to commit, with limited human resources. As in the case of grant allocation, the project-based support approach and the CfP procedure is the main aid modality but is questionable in terms of efficiency: on the one hand, the distribution of aid is fragmented into a multitude of supported projects, without any link between them. On the other hand, the procedure of instruction, validation of calls for proposal and monitoring of the grant contract are extremely long and complex, and time consuming for EUDs' employees. Two methods are generally used to increase cost-efficiency.

- Combine calls for proposals under the EIDHR and CSO-LA into one call.

¹⁸⁹ Joint strategic evaluation of budget support operations in Morocco (2005-2012), 2014

¹⁹⁰ ADE, 2017

the ENI evaluation report¹⁹¹ emphasises that “pooling with other European Financial Instruments Is was only reported for projects where it had been explicitly foreseen in the Regulation (for example support to civil society with EIDHR and DCI/CSO-LA)”. It also points out to efforts made by Delegations to combine calls for proposals under the EIDHR and CSO-LA into one call, making use of the two-year planning process.

- Resort to indirect management, delegation agreements, contract services and, to a lesser extent, TA, in order to increase allocated budgets and delegate management tasks to third parties.

Since 2012, the creation and use of new integrated civil society support programs also takes into account cost-efficiency criteria. First, by focusing resources on targeted support for civil society, these programs are more efficient than action grants on call for proposals. The focal points in the delegations, with the support of the members of the CoTE, were able to experiment different approaches in the region by asking about the best use or the best mix of grant, technical assistance, and direct agreement / contract service , in line with the cost-efficiency criterion and the management and monitoring capacities of the EU.

Indicator 2.1d	Extent to which efficiency gains, or losses, have occurred.
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1) At instrument level

Efficiency in aid delivery by the financial instruments covered by the evaluation (ENPI/ENI, EIDHR, NSA/CSO-LA, IcSP) is assessed positively in terms of procedures, processes and the ratio of administrative costs in all the evaluation reports reviewed at instrument/country level¹⁹²

- Financial control systems are in place and are effective at all levels. The key features introduced in 2014 by the Common Implementing Regulation (CIR) are improving flexibility and offering new opportunities to achieve the policy objectives. However, “most of the procedures and processes are bound by the Financial Regulations and administrative practices set internally at DG or service level. They are geared to financial controls ensuring the safe use of resources, i.e. limiting errors (residual error rate) and fraud, sometimes without a cost-effectiveness analysis in terms of acceleration of aid delivery” (ENI evaluation report).
- Adequate organisational set-up and high-quality in-house expertise (CoTE, EUDs’ CS/Gender/HR Focal Points), mentioned for the indicator 1.2a as key factors for improved outreach and diversification, are also considered so as regards efficiency in general and of cost-efficiency in particular. The ENI evaluation report specifically points out successful improvement to “enhance coherence in formulating sector and thematic ENI interventions”.

With regard to the thematic instruments, the evaluation reports reveal that one of the factors hampering the instruments’ performance is limited staff capacity both in EUDs and at HQ. Efficiency and cost-effectiveness around the Call for Proposals (CfP) process followed by both the CBSS and the Global Calls have been

¹⁹¹ Evaluation of the European Neighbourhood Instrument, Mid-term review report of the External Financing Instruments, 2017
Thematic evaluation of the European Commission support to respect of Human Rights and Fundamental Freedoms (global), 2011
External Evaluation of the European Instrument for Democracy and Human Rights (global), 2017
External Evaluation of the Programme “NSA-LA”, 2007-2013 (global)
Ex-post Evaluation of 2007-2013 ENPI CBC Programmes, 2018
Evaluation of the European Neighbourhood Instrument, Mid-term review report of the External Financing Instruments, 2017
Evaluation of the European Instrument for Democracy and Human Rights, Mid-term review report of the External Financing Instruments, 2017
Evaluation of the Development Cooperation Instrument, Mid-term review report of the External Financing Instruments, 2017
Midterm evaluation of the Instrument contributing to Stability and Peace, Mid-term review report of the External Financing Instruments, 2017
The European Union’s DCI-NSA Programme for West Bank and Gaza/Palestine, 2013.
Review of the effectiveness of the EIDHR in Palestinian Occupied Territories (2011-2015)
Review of the effectiveness of the NSA programme in the Occupied Palestinian Territory 2007-2011

¹⁹² Evaluation of the European Neighbourhood Instrument, Mid-term review report of the External Financing Instruments, 2017

questioned “given the large number of applications received, the two-stage process that leads to considerable time between advertisement and first release of funds, the complexity of the process that often leads to the exclusion of smaller CSOs, the very few contracts that are eventually awarded compared to the large number of applications received, and the burden created on Delegations given the ever diminishing levels of staff”¹⁹³. Beside the efforts to combine in one call EIDHR and CSO-LA, the fact remains that “the CfP process is slow, time-consuming and labour intensive” (EIDHR evaluation), as stated by all stakeholders interviewed, from EUDs to CSOs

2) At sample level

The ROM reports analysed highlights gains obtained through efficient implementation. Before 2011, targeted supports in Palestine¹⁹⁴ and Lebanon¹⁹⁵ under EIDHR managed inputs adequately, in a timely manner and in transparency due to M&E and reporting system in place. In Palestine, budget savings allowed introducing some additional activities.

In Algeria, the ROM report of the targeted support funded under CSO-LA¹⁹⁶ emphasises that cascading funding mechanism proved to be instrumental not only to improve the targeting and the outreach to local CSOs (between 15 to 30 grants allocated), but also to obtain efficiency gain due simplified management rules. The report recommends that support provided by cascading grants should be easier to anticipate for small structures in order to strengthen their capacity to implement value-added activities.

Several projects faced implementation difficulties that translated into efficiency losses. These difficulties emerged as early as the inception phase aimed at establishing implementation frameworks (Israel¹⁹⁷, Libya¹⁹⁸). In Jordan¹⁹⁹, the allocation of management and technical resources of the grantee turned out to be insufficient to adequately meet the broad scope of objectives and targets.

3) At CSOs level

While the CfP procedure is considered particularly burdensome for the EUDs staff, most of the CSOs encountered in the context of this evaluation (especially in Morocco, Israel, Palestine and at the CS Forum South) consider that the conditions and procedure for obtaining and managing the funds lead to inefficiencies for their organisation. Obtaining EU grants induces significant transaction costs : two-step selection process, gap in disbursements that weighs on cash flow, requirements on management, communication and visibility, M & E, entailing the allocation of dedicated human resources to deal with them. These EU requirements are recognised legitimate by the interviewed organisations. However, the bureaucratic nature of them generates operating costs that do not have a direct effect on the purpose of the actions and hardly covered. Cost-efficiency consideration by EUDS staff, especially when negotiating budgets with partners, is mainly about reducing operating costs in the budget to optimise the share of the budget dedicated to the action. On the other side, the amount of overheads allocated by budget has been stable and low over the years (7%).

¹⁹³ Evaluation of the European Instrument for Democracy and Human Rights, Mid-term review report of the External Financing Instruments, 2017

¹⁹⁴ Protecting trade union rights and uniting efforts to influence socio economic policies, EIDHR, 2008

¹⁹⁵ Action de Prévention et de Réhabilitation des Victimes de la Torture et autres Mauvais Traitements, durant leur Garde à Vue, leur Détention Provisoire et leur Incarcération, EIDHR, 2008

¹⁹⁶ “Michwar pour le dialogue» : Création d’un laboratoire d’expériences pour le Vivre ensemble soutenant l’émergence d’un dialogue entre société civile et autorités, CSO-LA, Handicap International Federation, 2016

¹⁹⁷ Enhancing Palestinian Civil Society: A Joint Israeli-Palestinian Programme to Promote Palestinian Rights in East Jerusalem, EIDHR, 2010

¹⁹⁸ Support to Civil Society in Libya, ENPI, 2011

¹⁹⁹ EIDHR, 2013: Support to Non State Actors to act as an effective drive for good governance and accountability

For many organisations interviewed, the project approach and the application of the cost-efficiency criterion of minimising operating costs contribute to placing organisations in a situation of insecurity. This runs counter to the EU's objectives of supporting civil society, which aims in particular to guarantee the financial stability of organisations.

In Israel, some organisations express their reluctance to be main applicant while responding to CfP.

In conclusion, the issue of gains and inefficiencies seems to be a zero-sum game between the EU and its partners since the efficiency gains for one (EU) are losses for the others.

Indicator 2.1e	Extent to which institutional capacity of partner organisations was assessed at programming, implementation and monitoring stages.
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1. In line with the objectives of COM 2012, the desk review shows that the delegations have developed a knowledge production system by more systematically using mapping exercise and identification missions, which contribute to better assess the institutional capacity of CSOs. The process of elaboration of the Civil Society Roadmap²⁰⁰ is also a valuable exercise generating a retrospective and prospective analysis and mapping EU and Member States interventions.
2. The CfP guidelines and selection criteria put in place include an assessment of the institutional capacities of CSOs. This is to study the records presented by the organisations in terms of project management and changes in the budget of the association. In the implementation phase, EUDs performs regular monitoring, including field visits, which can lead them to activate the ROM system or to call for a mid-term evaluation.

Concerning the assessment of institutional capacity of partner organisations at programming, implementation and monitoring stages, only the programmes dedicated to the CS on service contract have a continuous system of evaluation of capacities and needs (targeted support sample²⁰¹), as service contract are usually designed based on rigorous M&E system.

In Palestine, one of the lessons learned from the project - Promotion of the local democracy and economic activity through the reinforcement of Palestinian Non-State Actors (CSO-LA, 2013) – is “to conduct an in-depth partner assessment prior to finalisation of the selection of project partners, to develop an organisational Capacity Building Plan, and to work towards further strengthening and enhancing their capacities as part of the overall intervention”²⁰².

As for regional programme focused on capacity development, especially the TA component of the CS Facility South, the 2016 evaluation on CSO capacity development initiatives identified important challenges in terms of efficiency limitation. One of them is the lack of follow-up in the capacity development activities and the lack of linkages between them, “neglecting the basic reality of capacity development as ‘a process’ that materialises over time”.

Indicator 2.1f	Extent to which monitoring and other mechanisms are deployed in order to ensure cost-effectiveness of targeted support.
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At instruments level, the ENI evaluation report states that “monitoring and evaluation systems at project and country level provide the required feedback on programmes’ implementation”. The cost-effectiveness criteria is mainstreamed into the whole set of documents, from programming to the calls for proposal.

However, EIDHR's evaluation reports point to weak indicators to measure results. “There is considerable evidence that they are not used systematically to monitor achievements of results”. This statement may apply to the EU CSO capacity development initiative since the evaluation report highlights that “The various actors

²⁰⁰ European Parliamentary Research Department (EPRD), The EU Roadmap process: taking stock - Capitalisation report, Main Report and Annexes, 2015

²⁰¹ Lebanon, 2015: Technical assistance to support promotion of social dialogue in Lebanon ; Jordan, 2014: Support to Non State Actors to act as an effective drive for good governance and accountability

²⁰² Final report, 2015

involved in the EU support programme did not systematically monitor and/or document the wider effects of the capacity development support provided. The M&E systems in place are largely input and activity driven, with a focus on quantitative data”.

With regards to CSO-LA, the introduction of the EU Results Framework (RF) under DCI 2014-2020 is considered in the evaluation report²⁰³ “a step forward to monitor EU development co-operation”. However, it needs to be noted that the RF is “stronger on measuring the quantitative dimension of results than it is on measuring the qualitative side, such as the depth and quality of partnerships formed”.

At country level, the M&E system in place to ensure cost-effectiveness of targeted support (and beyond that effectiveness, impact and sustainability) seems to be a challenge, as reflected by the low number of M&E-related documents in the targeted support sample formed for this current evaluation. The evaluation team notes that the CRIS database does not collect much such documentation. Of the 36 initiatives sampled, 26 are closed, but only 7 have been “monitored” by the EU through the ROM system and only 1 has an evaluation report led by external and independent team, incorporated in the CRIS system²⁰⁴. The external and independent evaluation reports commissioned by the recipient of the funds are not listed in CRIS. We have been able to complement the data collection by referring to the internal final narrative reports of 5 other initiatives, considering at the opposite that interim half-yearly reports are not sufficiently evidence-based to be reflected in the evaluation.

Judgement Criterion 2.2: The scale of resources deployed for mainstreamed support has been appropriate in each of the regions under evaluation.

Indicator 2.2a	Extent to which monitoring and other mechanisms are deployed in order to ensure cost-effectiveness of mainstreaming activities.
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This could not be evidenced (See response to Indicator 1.2c)

Indicator 2.2b	Extent to which institutional capacity of partner organisations was assessed at programming, implementation and monitoring stages.
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This could not be evidenced in the documentation. (See response to Indicator 1.2c)

²⁰³ Evaluation of the Development Cooperation Instrument, Mid-term review report of the External Financing Instruments, 2017

²⁰⁴ Palestine, 2008. Protecting trade union rights and uniting efforts to influence socio economic policies, EIDHR

EQ3 (Effectiveness): What have been the effects of the EU's various forms of engagement with Civil Society in the Neighbourhood South?

Judgement Criterion 3.1: The effects achieved through the targeted support to civil society have corresponded to the EU's initial objectives in the Neighbourhood South

We identified 4 types of targeted support: (i) programmes integrating capacity building and policy dialogue, (ii) projects linking service and local governance, (iii) projects linking service and national advocacy, and (iv) strengthening projects capacity in countries in crisis. The documentation of the projects studied shows that they have been implemented in general, without encountering major problems, with the exception of a few projects in Egypt and Libya.

Consultations with CSOs for this evaluation, whether via the online survey or the interviews, show a high level of satisfaction with the EU's engagement to capacity building, highlighting in particular the positive evolution that has taken place since 2012.

Organisations implementing projects that combine service delivery and advocacy in the field of human rights or adopting a rights-based approach, are the ones that most develop their capacity to act as independent actors of development and governance in its own right. They are also the ones who are most involved in policy dialogue. These organisations have generally engaged in a long-term development process, often through partnership with an INGO or through successive EU support. The positive effects are all the more important in countries where there is a relatively stable and favourable environment for CSOs, as for Morocco, Palestine, Lebanon and Tunisia (since 2012).

As after 2012, civil society support programs provided a wide range of capacity development activities, some of which involved financial support through sub-granting. Nevertheless, these programs are more activity-oriented than change-oriented and do not view capacity development as a cumulative process. No new formalised collective dynamics emerged as a result of an EU program. In terms of capacity-building activities, the existing documentation mentions that the effects have been produced at the individual level, that is, at the level of the participants in the activities, without it being possible to show how the training and other types of activities help strengthen organisations. Several sources agree that training is the most common capacity-building activity but does not produce the desired effects. More recently, institutional coaching activities developed in the integrated CS support programs are recognised to have greater effect on organisations. These are qualitative, tailor-made actions that affect a smaller number of organisations.

More generally, the adoption of the programme approach (unlike the action grant) is a major innovation under test since 2012 in 5 countries in the region. The design of the most recent programs (such as that of Morocco) shows that lessons have been learned, which promises positive effects.

Finally, regional programmes have made great improvements, especially by being more innovative to target specific groups of people and individuals such as youth, though concrete results remain limited.

Indicator 3.1a

Aggregate achievement of short-/mid-term results within targeted support

The sample analysis reveals that the interventions can be categorised around 4 types of programme:

1. Comprehensive programmes for civil society support

One of the innovations of the EU's support to CS after 2011 is the launch of this type of programme dedicated to civil society, usually under ENP service contract, and articulating organisational capacity building activities and advocacy action. The objectives of these programmes are modelled on the EU objectives set in the COM 2012. They are designed by components, providing a wide range of activities in a coherent response to objectives, in terms of conducive environment, policy dialogue and the CS capacity development.

Three countries are in their second triannual programme phase (Morocco²⁰⁵, Tunisia²⁰⁶ and Lebanon²⁰⁷). Egypt has also benefited from funding for an integrated programme under SPRING fund. It was first suspended in 2013 and then reallocated in 2015 to focus on economic development and inclusive growth ²⁰⁸. The EUD in Israel launched its own programme in 2016, focused on Arab Civil Society in Israel²⁰⁹. It should be noted that the civil societies of Libya²¹⁰ and Algeria²¹¹ have benefited from a similar programme, but under the CSO-LA instrument because of the absence of a bilateral cooperation framework between the EU and these countries. Algeria and the EU have renewed their association agreement in 2016 with broader cooperation priorities including a "participatory democracy" component, leading to a specific programme (Le programme de renforcement des acteurs de développement local «CapDEL» - ENI), launched in 2017, funded by the EU and the Algerian Government (Ministry of Interior and local collectivities) and operated by the UNDP.

Among 6 initiatives in this type of programmes in the sample, only two in Egypt and in Libya have been monitored through ROM system and one is provided with internal interim reports. The others are too recent.

- In Egypt, the direct support to civil society component was removed from the programme - "Protection of Human Rights" and Civil Society' and "Support to Political Development and Good Governance". Signed in 2010 and designed for a period of 10 years, the programme has been revised many times, due to the institutional and political instability that followed the "revolution" of 2011 for several years (ROM report). Between 2011 and 2015, the sub-committee on political affairs and human rights assessing the implementation of the Action Plan was suspended. While relations have resumed since then, the initial goal of an independent civil society for inclusive development and participatory democracy has been narrowed down to cover only inclusive growth (vocational training, placement and creation), thereby dismissing elements emphasising CS independence, and democratic and participatory approaches.
- In Libya, the programme - Enabling Libyan NGOs to shape the future of the new Libyan Democracy - had to be suspended as well as the "Support to Civil Society" programme in Libya, due to "the lack of legal instruments (MoU or decree) to provide legitimacy to the programme, unstable government with high staff turnover, low capacity of the Libyan authorities to take strategic decisions, and local insecurity"²¹².

Alternatively, the 2016 Evaluation report on EU capacity support to CS²¹³ found that capacity development activities were delivered, mainly at individual and organisational levels, due to participation of Libyan activists and CSOs' representatives to training activities, seminars and other events outside the country. This evaluation also report that it contributed to developing strategic capacities of CSOs' leaders, deriving from interactions with other social actors, including local authorities, and from networking with regional counterparts

Tunisia PASC

The approach adopted by PASC was somewhat different in that it aimed to combining two modalities, with, on the one hand, a Technical Assistance dedicated to the promotion of a conducive environment (EU objective 2), and on the other hand, a grant for the development of civil society capacities for their enhanced participation to policy (sectorial) dialogue.

²⁰⁵ Civil Society Facility from 2014-2016 and the CS support Programme since 2017 (out of the sample)

²⁰⁶ PASC 1 from 2011-2015 and the launch of the PASC 2 is still pending (out of the sample)

²⁰⁷ Programme AFKAR from 2011 to 2014 (out of the sample) and the programme "Towards an active participation of civil society in the reform process" since 2016 (sampled)

²⁰⁸ Balfour, Fabbri and Youngs, 2013: Report on democracy assistance from the EU to the MENA, EUsprings

²⁰⁹ Local Action for National Impact: Strengthening Arab Civil Society in Israel

²¹⁰ Support to Civil Society in Libya in 2011 and Enabling Libyan NGOs to shape the future of the new Libyan Democracy in 2013 (sample)

²¹¹ In Algeria many capacity development initiatives jointly initiated with some EU member states have been reported such the Civil Society Resource Centre (co-financed by CSFS and French cooperation) and the 4th phase of the platform Joussour²¹¹ (co-financed by EU under CSO-LA and AfD).

²¹² Monitoring report, 2013

²¹³ Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South (2012 – 2016), 2016

Even the programme's governance was also specific since it was based on a multi-stakeholder approach with a monitoring committee made up of ministerial representatives, the EU and other CS actors considered as historic partners of the EU (LTDH). In addition, the scope of outreach and the program's set-up were more ambitious, based on the establishment of 6 local offices and focal points acting as a facilitator to ensure continuity of relationship with the actors of the territories.

According to the CS focal point of the EUD, the effectiveness has been satisfactory with regard to activity delivery for the benefit of the CSOs - despite the delays made during the first year due to the difficulties of governance and management of human resources, and despite criticisms strongly expressed by Tunisian civil society vis-à-vis a flagship EU programme on which there were many expectations. On the other hand, the achievement of tangible results on which to capitalise (especially in the perspective of programming for a second phase) has been much more difficult, whether in the field of associative networking ensuring a legitimate interlocutor function of the EU and public authorities, than consultation mechanisms.

The 2016 evaluation emphasises the short-term horizon of interventions at national and regional level. These initiatives act more as service operators, certainly demand-driven, but mainly focusing on delivering inputs without taking into account the processual and multi-faceted dimension of capacity building. This derives from a lack of follow-up opportunities to further develop skills and use them in concrete processes.

In its objective of reinforcing the policy dialogue (capacity building being a prerequisite), the PASC did not rely on dialogue dynamics and existing (endogenous) mechanisms of consultation between state actors and CS²¹⁴, which resulted in limited effects on capacity building. Similarly, the decision of the EUD to manage directly the "grants" component of the programme through open call of proposal did not allow to target the beneficiaries of the capacity development effort, thus limiting the possibilities of the cumulative effect sought after by what was originally intended to be a comprehensive approach²¹⁵.

The CS Facility Programme (bilateral) was designed to provide a flexible and tailored-made response to the needs of organisations. The approach adopted in terms of capacity development consisted of long-term accompaniment or coaching of the partners, breaking with a traditional approach of capacity building activities limited to ad hoc training, provided by an external expert not providing follow-up over time and whose approach and language are not always adapted to the audience. This point was especially mentioned in the Mapping. The TA has therefore consisted in supporting organisations in a development process based on the strategic capacities of organisations around the definition of an associative project that is collectively supported through strengthened organisational structures.

The approach and methods adopted by the Facility were considered positive by the CSOs benefiting from this program.

- On a more general level, the responses to the CSO survey underline the importance of the EU's contribution to the development of organisations' capacities.
- The CSOs interviewed during the field mission - who do not necessarily have the same level of development and capacity - confirmed the positive effects of this support on their organisation (case of the ADFM which had just renewed its structures organisational, with relative empowerment of sections around specific but convergent strategic directions.)

On the other hand, the scope of the effects on political dialogue has been limited, consisting of creating the minimum conditions for dialogue, namely a relationship of trust. The approach adopted was to organise joint training sessions - representatives of CSOs and state actors - and organise visits within the institutions to improve the level of information. These activities appear as relevant as necessary because of the initial low level of capacity of CSOs for political dialogue. Nevertheless, these are preliminary activities, ought to pave the way for a more structured support, developed in the Moucharaka programme launched in 2018 and in the inception phase during the time of the current evaluation.

2. Specific granted CSOs projects, combining capacity-building and advocacy activities toward enhanced policy dialogue

²¹⁴ Interview with the Programme Coordinator

²¹⁵ Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South (2012 – 2016), 2016

This type of project that we find in the sample or among the CSOs encountered in the field have in common to develop the territorial and multi-actors approach, conceived and promoted for a long time by DEVCO and the CSO-LA instrument. Policy dialogue takes place at the local level to promote and achieve inclusive development through spaces for dialogue and mechanisms for participation. Main outcomes are elaborated territorial diagnosis, needs assessment and local development plan following a participatory approach.

At the national level, advocacy campaigns and network/coalition building reflect the objective of CSOs to participate in the policy reform process. Unlike dedicated programmes, these initiatives have a much more precise focus, targeting either a specific population category as a factor of change (women²¹⁶, youth²¹⁷, and trade unions²¹⁸) or a specific sector (agriculture²¹⁹, media²²⁰, social dialogue²²¹).

In the sample, there are 12 initiatives (6 ENI / ENPI, 3 CSO-LA, 3 EIDHR), corresponding to this type of intervention. Only 4 were monitored through ROM missions.

- In Jordan, the internal reports of the programme - Support to Non State Actors to act as an effective drive for good governance and accountability – highlights major achievements, such the unprecedented networking momenta among CSOs supporting women through improved gender awareness skills and advocacy capacities, as well as improved gender analytical and training skills among partner organisations and institutions. The final report indicates a major contribution in terms of facilitating Government/CSO dialogue on a number of high-profile platforms, turning into national debate, such as the decentralisation. However, the report concludes that “the ultimate objective of setting in motion a collaborative effort between willing and capable Government institutions and a structured civil society to establish sustainable mechanisms of dialogue and standards for participatory policy making remains challenging”.
- In Palestine (« Promotion of the local democracy and economic activity through the reinforcement of Palestinian Non State Actors », 2013, CSO-LA) and in Algeria (« Michwar pour le dialogue », 2016, CSO-LA), ROM reports indicate strong potential for impact as a result of capacity building actions to enhance civil society participation in local governance. Pourtant, le projet en Palestine a duré sur une période de temps trop courte pour produire des effets. In Algeria, the 2016 evaluation report highlights several capacity development initiatives jointly initiated with France - such the Civil Society Resource Centre through the Programme Concerté Pluri-acteurs (PCPA Algérie) launched since 2007. The Civil Society Resource Centre is presented as a lasting infrastructure for the development of capacity over time
- At regional level, TRESMED programme was launched in 2002 within the framework of the Euromed Partnership and renewed 4 times (last time was in 2011). TRESMED is a joint initiative Euro-Mediterranean Economic and Social Chambers (ESC) and opens an opportunity to “bring together civil societies, establishing the lines of collaboration between the economic and social partners on issues and problems of common interest relating to the construction process of the Euro-Mediterranean Association”²²². In 2011, TRESMED 4 (sampled by the current evaluation) has the objectives to strengthen the consultative function of economic and social partners in the Euro-Mediterranean region, aiming at “consolidating methods for collaboration and dialogue amongst the organisations involved”²²³, primarily by carrying out workshops on socio-economic matter. The ROM report (2012) shows that the programme ensures a large participation of different delegations and facilitates of wide diffusion of best practices in different aspects of social dialogue, with a possible

²¹⁶ Regional, 2015, ENI: CSO WINS – Capacity-building in the Southern Mediterranean to Open Policy Dialogue and Monitoring for Women in Society

²¹⁷ Regional, 2014, ENI : NetMed Youth

²¹⁸ Palestine, 2008, EIDHR: Protecting trade union rights and uniting efforts to influence socio economic policies

²¹⁹ Lebanon, 2015, CSO-LA: Raise the voice of Lebanese CSOs towards an inclusive and sustainable development in agriculture and environment field in North Lebanon

²²⁰ Tunisia, 2017, ENI : Assistance technique principale pour le programme d'Appui aux Médias

²²¹ Lebanon, 2015, ENPI: Technical assistance to support promotion of social dialogue in Lebanon

Regional, 2011, ENPI: TRESMED IV (since 2002)

Regional, 2016, ENI: SOLID – South MED Social Dialogue

²²² Monitoring report, 2012 (ROM)

²²³ Idem

multiplication of the results. However, the lack of continuity in the participation of actors has been identified as an impeding factor toward long-term effect. To note that this kind of programme that spans over the evaluation period should deserve a targeted impact evaluation.

- At regional level, the 2016 evaluation²²⁴ highlights the positive effects caused by the capacity development component of the CSFS led by a TA. The regional Fellows Programme is evaluated as an innovative initiative to deliver capacity support on political skills and facilitate networking of selected young people across the region. The ‘trainers of trainers’ also represents “an important capital of human capabilities that can be tapped by CSOs of the region”, whose objectives are inclusive development and better governance.

For the 2007-2011 period, the evaluation report on EU support to ENP regions argues that “regional programmes also have a broad geographical scope, since they generally include representatives from partner countries and from Europe that have, to a great extent, diverse culture and approaches to improving the knowledge and practices exchanges. Nevertheless, in spite of the numerous training and networking activities, the concrete effects and impact of those programmes on CSOs is limited”. [...] “Their design often had a broad perspective, outlining more a political goal or a set of intentions than a coherent strategy capable of influencing the real situation of the people. [...] More generally, the resources available for each regional project are too small and the actions too diverse to have a great immediate impact at either regional or national level. Only at the local level have more concrete achievements been observed”.

This last observation was also made for the 2011-2015 period concerning CSO capacity development initiatives. The 2016 evaluation report argues that “traction and changes are primarily to be found at national level, much less at regional level”. The report also emphasises that a number of opportunities to improve the effectiveness and the efficiency of the regional interventions “were missed”, due to a lack of synergies between bilateral and regional programmes.

In countries with limited civic space, the short- / mid-term achievements of the dedicated CS support programmes are difficult to perceive or remain fragile. On the other hand, in countries with more open space (Tunisia, Morocco²²⁵, Lebanon²²⁶, West Bank, Israel²²⁷), their design, and if the implementation is not disturbed, suggests significant effects on civil society in relation to the EU objectives of capacity building and policy dialogue. Indeed, these programmes target both CSOs and institutional bodies and adopt a comprehensive approach, providing technical training tailored to the needs of organisations, coaching and networking facilitation. All of these elements combine to increase the capacity of organisations to participate in reform processes through advocacy.

3. Projects in Morocco²²⁸, Lebanon²²⁹, Tunisia²³⁰ and Egypt²³¹, that combine service delivery and advocacy

This type of targeted support illustrates the shift in the role played by CSOs, from services provider to advocacy actor, or the combination of both, following a rights-based approach, as these organisations base their legitimacy on their proximity with final beneficiaries and their practical expertise to address their need.

The organisations implementing this type of projects have been successful in drawing attention of the authorities as rights protector on types of need covered by the CS, or to change their practices and policies through awareness and training. Medio-psycho-social service provider organisations have developed assistance mechanisms in coordination with the public authorities at the multi-stakeholder level and at a technical level. This approach is usually applied by INGO while

²²⁴ Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South (2012 – 2016), 2016

²²⁵ ENI, 2017 : Programme d'appui à la société civile au Maroc (following the Civil Society Facility Programme in 2014)

²²⁶ ENI, 2016 : Towards an active participation of civil society in the reform process

²²⁷ ENI, 2016 : Local Action for National Impact: Strengthening Arab Civil Society in Israel

²²⁸ NSA-LA, 2009 : Mobilisation et renforcement des acteurs locaux et services pour une meilleure insertion des personnes en situation de handicap dans la région Souss-Massa-Daraâ au Maroc

²²⁹ EIDHR, 2008 : Action de Prévention et de Réhabilitation des Victimes de la Torture et autres Mauvais Traitements, durant leur Garde à Vue, leur Détention Provisoire et leur Incarcération

²³⁰ ENI, 2015 : Lutte contre les discriminations et les violences fondées sur le genre

²³¹ ENPI, 2016: Children and Youth Socio-Economic Development Fund. Supporting grassroot CSOs for area-based interventions in the poorest villages of Qena and Sohag

partnering with local CSOs, such as Médecins du Monde (Palestine, Morocco), Handicap International -Humanity and Inclusion (Morocco, Tunisia, Palestine), or Samusocial International (Egypt).

4. Programmes, in Syria²³² that focus solely on capacity building for civil society and individuals, given the conflict situation in this country. The internal interim report available indicates that the outputs were delivered and that needs assessment were carried out each time prior to implementation. This report does not explicit the capacity building outcome.

Judgement Criterion 3.2: The effects achieved through the mainstreamed support to civil society have corresponded to the EU's initial objectives in each of the regions under evaluation

Before 2012, the issue of mainstreamed support to CSOs had not yet reached the level of institutionalisation provided by the 2012 COM. Nevertheless, there were a number of sectors in which programmes were implemented with a civil society component, mainly through regional programmes who proved to be highly relevant and effective, in stimulating dialogue and cooperation between regional partners. In the most sensitive areas (e.g. governance, migration, civil society), the regional approach was very necessary, as there was little space for bilateral cooperation.

After 2012, there is a systematic reference to CS in the EU country Action Plans and the priority sectors. All the cases of mainstreamed support to CSOs that we have identified, either being in the framework of regional programmes before 2009 or in national sector programmes after 2012, are divided into two modalities:

- Inclusion of a funding mechanism (mainly Action Grants through CfP) in specific sectors, in relation to its service provider role. No evidence could be found in the documentation on how this mechanism interrelates to the EU budget support to the government, which makes mainstreamed support initially relevant
- Participation of the CS in the elaboration phase of the policy-making, though consultations and National Meetings, without there being any evidence on the influence exercised by the CS through this participation
- On the contrary, budget support and CS support seem disconnected from each other. Likewise, the consultation with the CS is more top-down and punctual without there being a CS representation mechanism allowing it to have access to information on elements of negotiation with the EU, and follow up on the implementation.

The organisation of the cooperation section of the EUDs according to the sectoral priorities allows to mainstream the CS, insofar as each person in charge of a sector leads the set of supports, to the State and to the CS, in link with HR and CS focal points. This is the case, for example, in Morocco and Tunisia. In Palestine, the organisation is different in that the EU adopts a multi-sectoral approach in relation to territories with specific status (East Jerusalem, Area C, Gaza), in addition to the more traditional sectoral approach. Mainstreaming CS into sector support is carried out, like in the Water and Agriculture sectors or in the Area C program, because of the high level of capacity of some organisations to ensure technical provider role.

Indicator 3.2a	Sectoral achievement of short/mid-term results within mainstreamed support
1) Before 2012, the issue of mainstreamed support to CSOs had not yet reached the level of institutionalisation provided by the 2012 COM.	

²³² EIDHR, 2009 ; Formation de cadres de direction des organisations non-gouvernementales, de journalistes et de juristes en Syrie

Nevertheless, the analysis of the 2009 ENP Progress Reports allows to identify a number of sectors in which programmes are implemented with a civil society component. The mainstreaming of CS seems then to be introduced through regional programmes, based on common interest. These sectors and programmes include:

Youth policy with the Euromed Youth II programme in which Morocco actively participated²³³. This programme promotes cooperation and the development of partnerships between Moroccan and European youth organisations in the fields of intercultural dialogue, informal education and youth exchanges by supporting exchange and In Tunisia, as part of the regional Med-Pact programme to strengthen the partnership between local authorities and civil society on both sides of the Mediterranean, several municipalities respectively participated in water sanitation projects in the Mediterranean coastal zones, in integrated urban development and planning through the participation of civil society, at the level of consultation but also the implementation of certain activities (awareness raising)

Palestine is part of the European Union's Partnership for Peace (PfP) programme, whose civil society component contributed to conflict resolution and mutual understanding in the areas of education and human rights protection, common cultural heritage and education for peace.

In agriculture and rural development²³⁴, the European Neighbourhood Programme for Agriculture and Rural Development (ENPARD) started with Tunisia, Morocco, Egypt and Jordan, and following the partners' interest it was extended to Algeria and Lebanon. In each country, representatives of government, civil society and research institutes identified the key challenges and priorities for the country to address in this field. The dialogues under ENPARD promoted long-term agricultural and rural development strategies, through pilot activities prepared with a territorial and participatory community based rural development approach.

As regards environment and climate change, H2020 Capacity-Building/Mediterranean Environment Programme implemented in the framework of the Horizon 2020 roadmap (endorsed in 2006). Training events have been foreseen in a number of areas, including effective Involvement of Civil Society in the de-pollution of the Mediterranean Sea and Green Events Training. Training activities that are expected to strengthen capacities of national governmental and non-governmental institutions. Some Southern ENP countries have initiated actions to decentralise environment management (Jordan, Morocco) and increase civil bodies awareness and participation (Egypt, Israel, Jordan, Morocco, Tunisia and to a lesser extent Lebanon). The evaluation of the European Union's Support to two European Neighbourhood Policy Regions (East and South) in 2013 could not point out to significant results

The project CLIMA SOUTH was launched by the end of 2012 to support regional capacity building in climate change mitigation and adaptation, and to enhance cooperation with the EU. An agreement with the UNDP led to capacity-building grants for environmental NGOs in European Neighbourhood countries so they can develop their potential in terms of environmental governance, awareness and public participation.

The ENP Progress Reports are an interesting source of information for identifying mainstreamed support initiatives related to regional programmes before 2012 and show how the inputs provided are relevant to the regional objectives related to the cooperation between the Euromed Partners. On the other hand, they do not present the sectoral achievements in the short / medium term of these initiatives, nor do they provide any evidence of CS's contribution to policy development.

CS mainstreaming through regional programmes seems to be highly relevant and effective, according to Evaluation of the European Union's Support to two European Neighbourhood Policy Regions (East and South) in 2013. Regional projects stimulate dialogue and cooperation between regional partners. A "peer to peer" mechanism was quite successful in many cases. In the most sensitive areas (e.g. governance, migration, civil society), the regional approach was very necessary, as there was little space for bilateral cooperation.

2) In accordance with the 2012 COM, the development of the CS roadmaps in 2013-2014 institutionalised the CS mainstreaming.

²³³ ENP Progress Report 2009 - Morocco

²³⁴ ENI Implementation of policy review 2012

According to the study “Roadmap Taking Stock”²³⁵, in countries with a non-enabling environment - which is the case for in half of the countries in the region²³⁶ (Civicus index²³⁷, USAID Sustainability index²³⁸) – “mainstreaming does not appear as a priority in most of the Roadmaps assessed. Rather it is a mechanism through which dialogue and CS participation can be further promoted”. Among the 7 available and analysed roadmaps in the ENP South region²³⁹, two DUEs present clear initiatives or objectives in terms of CS mainstreaming, in countries with an open civic space:

In Israel, dialogue between CSOs and the relevant Israeli official bodies is an inherent component of the implementation of the Euromed Youth IV programme (Ministry of Education) and the Erasmus Plus programme (Council for Higher Education) in Israel.

In Morocco, the roadmap envisages « a gradual involvement of the CS in monitoring and implementing programmes to support sectoral reforms, in partnership with the Moroccan government (DUE).

In terms of short and medium terms achievement, two countries, Morocco and Tunisia, seem to stand out. Out of the 15 initiatives of the mainstreamed support sample that we have selected for this evaluation, 5 have no link with civil society²⁴⁰, 3 have a limited link (integrating mechanisms for consultation between stakeholders or accepting CSOs as beneficiaries²⁴¹), 4 integrate a civil society component to capacity building actions²⁴². Finally, 2 have a high level of mainstreaming: The first is similar to a targeted support to a Trade Union (UGTT in Tunisia), in the form of a budget support²⁴³. The second, in Morocco, is a model of success of CSO mainstreaming in the context of the budget support in Morocco²⁴⁴

In Morocco, this case must be emphasised since it corresponds perfectly to the objectives of the EU in terms of engagement with the SC. As part of the continuity of the EU's various budget support in the health, education and human development sectors in Morocco, this programme aimed at consolidating the achievements of previous initiatives²⁴⁵. The programme developed an integrated approach to social protection policy promoting institutional and financial rationalisation of the sector, facilitation of consultation with civil society and social partners, improvement of fiscal transparency and governance, as well as promoting good practice in insurance and social assistance. Civil society was integrated into this sectoral programme, both as a service provider but also through consultation mechanisms and inclusive governance, in compliance with the EU objectives.

Nevertheless, success varies according to sectors. For instance, the evaluation report as regards Budget Support in Morocco argues that the policy dialogue within the education sector remains largely an "exclusive interaction between the Government and TFPs". In general, it considers that the current landscape of civil society does not seem to offer opportunities for expanded sectoral dialogue (sensitivity of the trade union issue in some sectors, civil society weakly structured and

²³⁵ European Parliamentary Research Department, 'The EU Roadmap process: taking stock - Capitalisation report, Main Report and Annexes', 2015

²³⁶ Algeria, Egypt, Jordan, Libya, Syria

²³⁷ State of Civil Society Report, (2011-2018), civicus.org

²³⁸ USAID, The Civil Society Organization Sustainability Index for the Middle East and North Africa (2013-2017)

²³⁹ Egypt, Jordan, Palestine, Israel, Tunisia, Morocco, Algeria

²⁴⁰ Lebanon, ENI, 2015 : Enhanced capability for Integrated Border Management (IBM Lebanon 2) ; Morocco, ENI, 2016 : Contrat d'appui budgétaire pour l'appui à la croissance verte et à la compétitivité du Maroc ; Tunisia, ENI-CBC, 2017 : Appui au ministère de la Culture et de la sauvegarde du patrimoine dans la mise en œuvre de sa politique" ; Palestine, ENPI, 2016 : Establishment and operation of the Water Sector Regulatory Council (Wastewater and desalination monitoring program) ; Jordan, ENI, 2017 : Jordanian Action for the Development of the Enterprise (JADE)

²⁴¹ Algeria, ENI, 2016 : programme d'appui à la mise en œuvre de l'accord d'association (P3A III) ; Egypt, ENPI, 2012 : Securing Rights and Improving Livelihoods of Women (SRILW) ; Jordan, ENPI, 2015 : Promoting financial inclusion through improved governance and outreach of Microfinance in Jordan ; Palestine, ENI, 2017: Reform and Development of Markets, Value Chains and Producers' Organizations

²⁴² Egypt, ENPI, 2011 : Technical Assistance to the Support to Rural Development Programme ; Lebanon, ENPI, 2013: EU Support to the Lebanese Electoral Assistance Programme (LEAP) for the 2013 Parliamentary Elections

²⁴³ ENPI, 2014 : Renforcement des capacités de l'UGTT pour l'institutionnalisation et l'opérationnalisation du Dialogue Social au service de la croissance et de l'emploi aux niveaux national et régional

²⁴⁴ ENI, 2017 : 'appui budgétaire du programme d'appui à la Protection Sociale

²⁴⁵ Evaluation conjointe des opérations d'appui budgétaire au Maroc, 2014

rarely advocacy oriented). The report concludes that "while extending participation in governance mechanisms for sectoral programmes may take time, this issue has certainly not been one of TFPs' strategic priorities".

3) Focus on CS mainstreaming in the migration sector in Morocco

In June 2013, the Partnership for Mobility, Migration and Security was signed between the European Union, nine Member States of the European Union and Morocco. The new migration policy of Morocco was announced in 2013, culminating in 2014 on the National Strategy on Migration and Asylum and in 2015 on the National Strategy benefitting Moroccans living abroad. Strengthening the partnership between the State and the CS is an important objective of the strategies, particularly in terms of improving access to basic services (e.g. education, health, employment). This is part of the mainstreamed support to CS. EU support to the Ministry has enabled it to launch three calls for projects in 2014, 2015 and 2016, respectively. The direct support provided by the European Union is important but is presented in a fragmented way, mobilising the European Instrument Neighbourhood, the Migration and Asylum Thematic Instrument, the Global Public Goods and Challenges Fund, the Asylum, Migration and Integration Fund (apart from ENI, the other instruments are not covered by the evaluation). Among the projects identified in ENI, we can mention the Tamkine migrants program, Improving the access to Medico-Psycho-Social support for migrant Women in Vulnerable Situations in Morocco, Especially Pregnant Women, with a Baby, or victims of violence. In 2016, the EU launches the Migration Policy Support Programme of the Kingdom of Morocco (CRIS Reference: ENI / 2016 / 39-372). Of the € 35 million, € 27 million is allocated for direct management budget support and € 8 million for additional indirect management support provided to the Technical Agencies of Cooperation of France (Expertise France) and Spain (AECID), as well as United Nations agencies. These organisations are in turn responsible for integrating support for civil society as mainstreamed support. A new action for Morocco was adopted in 2018, worth EUR 6.5 million, targeting NGOs as implementing partners selected through CfP, to facilitate access to basic services for vulnerable migrants and improve local associations and organisations' capacity to effectively deliver services.

Tunisia also seems very advanced in terms of mainstreamed supports to CSOs. The analysis of the Annual Report of the EUD in 2017 makes it possible to identify specific cases. Outside the traditional fields of intervention on which the CS is explicitly and strongly supported (human rights and democracy), we have been able to identify 5 sectors in which programmes integrate a civil society component.

- In the area of culture, launching in 2016 of the bilateral programme "strengthening the cultural sector" through these two components: support to the Tunisian Ministry of Cultural Affairs in its decentralisation policy and support for civil society through calls for proposals within the Tfanem project, implemented by the EUNIC network, which brings together all the European cultural institutes, under the auspices of the British Council.
- In terms of employment policy, the second "Programme d'Appui à la Relance" (PAR-II) includes a component dedicated to supporting projects and initiatives led by civil society (call for proposals) in partnership with the private sector and local authorities .
- With regard to the environment, the implementation of a "local environmental governance" programme, involving all territorial actors (citizens, civil society, industrialists, municipalities, public authorities) and favouring consultation and decision-making to respond to environmental challenges from the Gabès region heavily affected by industrial pollution. A capacity building component and targeted support to local CSOs are also included in order to complement the facilities granted to the Tunisian Chemical Group to improve its environmental performance.
- In the area of justice, the Justice Reform Support Programme (PARJ) is structured around three axes: an independent and effective justice system, better access of the citizen to justice, the upgrading of infrastructure standards judicial and penitentiary. A civil society component has been integrated into the programme through a call for proposal mechanism for targeted support to CSOs through which they play a service provider role (improving access to legal aid, assisting prisoners in prison and in juvenile centres)
- In the area of migration, the signing of the "Joint Declaration establishing a Mobility Partnership between Tunisia and the EU and Member States" in 2014 has given rise to a flagship project to support the implementation of the partnership and to strengthen Tunisian capacities in the field of labour migration, to improve

the knowledge of Tunisian communities in Europe and to mobilise them for the development of Tunisia, as well as to strengthen the capacity of the authorities and the Tunisian civil society to support the reintegration of returnees to Tunisia. The integration of civil society takes place under the prism of service provider.

All the cases of mainstreamed support to CSOs that we have identified, either being in the framework of regional programmes before 2009 or in national sector programmes after 2012, are divided into two modalities:

- Inclusion of a funding mechanism for targeted support to CSOs in specific sectors, in relation to its service provider role. No evidence could be found in the documentation on how this mechanism interrelates to the EU budget support to the government, which makes mainstreamed support initially relevant.
- Participation of the CS in the mechanisms of consultation and programme management, without there being any evidence on the influence exercised by the CS through this participation.

The organisation of the cooperation section of the EUDs according to the sectoral priorities allow to easily mainstream the CS, insofar as each person in charge of a sector leads the set of supports, to the State and to the CS, in link with HR and CS focal points. This is the case, for example, in Morocco and Tunisia.

In Palestine, the organisation is different in that the EU in Palestine adopts a multi-sectoral approach in relation to territories with specific status (East Jerusalem, Area C, Gaza), in addition to the more traditional sectoral approach. Mainstreaming CS into sector support is carried out, like in the Water and Agriculture sectors or in the Area C program, because of the high level of capacity of some organisations to ensure technical provider role.

Indicator 3.2b	Extent to which the EU strategic approach and related guidelines and tools to deal with CS mainstreaming were appropriate.
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If we refer to the level of mainstreaming of CS, we can say that the note sent to the Heads of Delegations in 2017 about mainstreaming was appropriate. On the other hand, when asked about the CoTE notes, the EUDs interviewed during field visits and during the Focal Points seminar in Brussels showed limited knowledge on the guidelines and tools produced by CoTE to improve the EU engagement with the CS.

Judgement Criterion 3.3: The effects achieved through policy-level engagement with civil society have corresponded to the EU's initial objectives in each of the regions under evaluation

Despite a particularly unfavourable context for civil society in most countries in 2009 (almost complete closure in Syria and Libya, very limited space in Algeria and Jordan, very controlled in Tunisia and Egypt), the ENP progress reports highlight areas where governmental authorities consulted the CS in the process of public policy making. This is particularly the case in the field of social protection, with the MoSS as the main interlocutor, but also independent public organisations or charities, presided over by the first ladies or a member of the ruling family (Jordan, Egypt, Morocco). Consequently, the strategy for the protection of women in Palestine and Morocco or the child protection strategy in Egypt and Lebanon (child trafficking), has been traditionally subject to consultation with civil society. Policy dialogue between civil societies and governments seems possible even in restrictive contexts, on non-sectoral policies centred on a specific category of population (Women and Children), which is overseen by a government body that selects the organisations with which it wishes to interact. The dialogue is all the more feasible as the issues on the agenda are consensus and are not considered sensitive

After 2011, the level of participation of civil society in the policy dialogue has been skyrocketing in Morocco, Tunisia and Palestine, and now touches complex areas, leaving the traditional areas in which the CS was traditionally confined: Corruption, Justice, Migration, local governance, security.

In countries where policy dialogue between the CS and the authorities is limited due to a lack of civic space, the EU strives to promote an enabling environment for CSOs through political and diplomatic dialogue with the authorities, and adjust its support to Priorities, negotiated and agreed upon by the EU and the Country

Partner. This situation places the EU in the face of the following contradiction: on the one hand, to cooperate with States that restrict the action of civil society, practicing, for some of them, a more general crackdown on civil liberties and, on the other hand, to engage with civil society through democratisation goals.

At regional level, CSOs survey's responses appreciate the resumption of regional dialogue and underline its importance. The observation at the CS Forum South in Brussels in 2016²⁴⁶ and 2018, along with key stakeholders²⁴⁷ Interviews suggest that the EU's attempts to engage in a structured dialogue with the CS of the ENP South have had little effects.

There is, first, little continuity between each edition as different organisations participate in each. Although it makes it possible to reach a larger number of organisations that are given the opportunity to express, it makes it more difficult to follow up recommendations and deepen them.

A second set of reasons explaining why the effects of regional dialogue are limited comprises a low understanding of objectives of the Forum by the CSOs, an offset in expectations between EU and CSOs, and a difficult articulation between the national and regional levels. The other challenge lies in the lack of civil society capacities, resulting from a low knowledge of EU structures and initiatives and a low capacity to produce strategic inputs at the regional level, given the specificities of each countries.

A real qualitative leap was made between 2016 and 2017 with the constitution of thematic groups²⁴⁸. The nature of the claims is much more qualitative in 2017 and is receiving more attention from the Commission. This is illustrated by taking into account the recommendations on the promotion and protection of LGBT rights, through the launch by the EU of a regional (confidential) programme under the EIDHR, with a contract expected in 2019.

The last phase of the structured dialogue between the EU and the CSOs in the ENP South starts in 2018 with the "regional hub", a grant-funded programme led by a consortium of North and South NGOs and networks, and renamed as Majalat. This grant framework corresponds to the demand of the main regional CSO networks (Euromed Rights, ANND, Solidar) to lead the conduct of the dialogue process. This 3-year programme is seen as an opportunity to go beyond a stand-alone event, introducing more continuity and ownership.

Indicator 3.3a

Aggregate achievement of short-/mid-term results within policy-level engagement

1. The first EU's initial objectives relating to policy-level engagement with CS is to facilitate CSOs participation in domestic policies, which entails policy level engagement with governments to promote CSOs participation.

1.1 The feature of restricted or closing civic space in the region

The comparative analysis of the ENP Progress Report in 2009, 2013 and 2015, not only makes it possible to list the initiatives of participation of civil society in policy dialogue with the authorities of the countries, but also to identify the changes in the relationship between these two actors, taking into account the political and institutional upheavals that occurred in the region from 2011.

In 2009, among the ENP Progress Reports, only that of Morocco does not mention the problem of relations between the State and civil society, and a legislative and regulatory framework restricting freedom of association, particularly as regards registration and financing conditions. In general, the reports are more of a country context analysis, showing the progress made by the country partners in the jointly defined areas of cooperation. In terms of policy dialogue, the reports list the initiatives undertaken by the stakeholders (EU, State, SC) but without developing an analysis of the effects of these initiatives on the progress made.

²⁴⁶ Author was mandated by the University of Geneva to participate at the Forum and observe the EU/CS dialogue.

²⁴⁷ Representatives from Regional CS networks, DEVCO/DGNEAR

²⁴⁸ Concept notes and reports of the CS Forum South in 2015, 2016, 2017

In the 2013 and 2015 ENP progress reports, Tunisia has added to Morocco as an exception in a landscape dominated by the absence of policy dialogue (Jordan, Gaza, Egypt), despite the relatively favourable environment in some countries (Lebanon²⁴⁹, Israel²⁵⁰). Even Morocco, which had an enviable position in 2009 as regards the relationship between the State and civil society, saw the latter deteriorate with legislative proposals restricting freedom of association (particularly with regard to access to foreign funding) and denounced by a CS coalition gathered under the "Appeal of Rabat".

This authoritarian regression and the reference to the concept of "deep state" to explain the resistance to change are a constant in all countries of the region, which, to varying degrees, try to limit the conditions of operation or expression the CS, by acting on the judicial system, or on the financial and banking system, relying in particular on mechanisms to combat the financing of terrorism and money laundering.²⁵¹

1.2 CS/State Policy dialogue achievements in 2009, as a starting point

Despite a particularly unfavourable context for civil society in most countries in 2009 (almost complete closure in Syria and Libya, very limited space in Algeria and Jordan, very controlled in Tunisia and Egypt), the ENP progress reports highlight areas where governmental authorities consulted the CS in the process of public policy making. This is the strategy for the protection of women in Palestine and Morocco or the child protection strategy in Egypt and Lebanon (child trafficking), which were subject to consultation with civil society. Policy dialogue between civil societies and governments seems possible even in restrictive contexts, on non-sectoral policies centred on a specific category of population (Women and Children), which is overseen by a government body that selects the organisations with which it wishes to interact. The dialogue is all the more feasible as the issues on the agenda are consensus and are not considered sensitive, as this has been pointed out by the "Roadmap Taking Stock" study.

1.3 Policy dialogue achievements after 2011 in transitioning or more opened countries

The analysis of the documentation, the CSOs and EUDs surveys and the interviews show that the participation of the civil society in the policy dialogue with the State as well as its contribution to the policy making has progressed strongly in Morocco, Tunisia and in Palestine, touching complex areas and leaving the traditional areas in which the CS was traditionally confined.

- Morocco's ENP Progress Report indicates that "Morocco's civil society is very active in the public debate and seeks to establish itself more and more as an interlocutor with the authorities, in order to establish a participatory approach. It is, in all transparency, an important partner for the EU". All the organisations surveyed and respondents underline the turning point since 2011 in terms of legal and regulatory framework concerning citizen participation, women and youth. The limits to dialogue go beyond the regulatory framework. In most of the countries, such as Morocco, policy dialogue is also a matter of politics and oppose an Islamist government to the CS defending human rights and supported by the EU. In other countries, as in Lebanon, the difficulties of the dialogue come from the governmental and institutional instability and the complexity of the confessional system, whereas the conditions of operation and expression of the CS are met.
- In Morocco, the participation of CS in domestic policies covers many sectors and programmes since there are numerous experimented coalitions engaged in policy dialogue²⁵², whose representatives are consulted by EUD on a regular basis: Evaluation of the Government's Equality 1 programme; Identification of the Government programme for Equality 2; Evaluation of EU support to civil society in the Southern Neighbourhood; Monitoring Mission of the European Union Support Programme for the Reform of the Education System in Morocco (Education II); Identification of the Youth programme; Formulation of the Literacy Programme (ALPHA 2) Implementation of the Regulatory Convergence Programme (meeting with the General Confederation of Enterprises of Morocco -

²⁴⁹ In Lebanon, governmental instability, with long periods of power vacuum, does not provide the conditions for the establishment of a policy (and political) dialogue

²⁵⁰ In Israel, the problem of trust between state and civil society, featured by hostile statements and measures against the CS, is not conducive to establish a fruitful policy dialogue.

²⁵¹ Observation of the Governance thematic group of the CSF South and interviews with the participants

²⁵² Dynamics of the Rabat Appeal; Women Movement for Equality; Collective for the reform of justice

CGEM); Negotiation of the budget support programme for migration policies; Programme: Professional integration of migrants (information session), Follow-up of COP22 recommendations²⁵³.

- In Tunisia, the areas of cooperation where there is a strong mobilisation of civil society engaged in policy dialogue with the authorities and the EU, as illustrated in the ENP Country Report²⁵⁴, are the preparatory work for the launch of the CAFTA negotiations and the draft law on human beings trafficking in consultation with civil society. In Tunisia, ENI support to CSOs in general has been evaluated²⁵⁵ crucial to “consolidate their status as stakeholders in the consultation processes and in policy dialogue”.
- In Palestine, while the enabling environment for civil society is relatively positive, the EU “have remained vigilant²⁵⁶”, meaning that it raises concerns to the authorities on issues relating to civil society (e.g. NGO Affairs Commission) and provide counselling on specific policy (adoption by the Palestinian Authority of a gender mainstreamed participatory approach for the definition of the Palestinian National Development Plan (2014-2016). The government developed the 2017-2022 National Policy Programme (NAP), for which “the process has been more consultative than ever”²⁵⁷.

The EU in Palestine initiated targeted support that has enhanced coordination and integration among civil society organisations so they can play a greater governance role. (EU support to four NGOs platforms: PGUS, PNGO, GPU and PNIN, and then, additional support to unify three of them, leading to the Coordination Council of Palestinian NGOs, then to The Palestinian Umbrella NGO Network). Involving civil society in these inclusive and consultative processes, such as the one that took place for the National Policy Programme in 2016, is believed to strengthen its capacity to play a greater role in policy monitoring.

The ENPI evaluation²⁵⁸ considers that in the framework of ENI assistance, civil society participates in policy dialogue and this is systematically promoted by the EUD. However, the reports convey an issue raised in the South Neighbourhood, related to the limited legitimacy of umbrella organisations, their lack of capacity for a structured dialogue, and to political/religious rationale (rather than development). This is especially highlighted in the CS Roadmap of Morocco and Jordan.

1.4 Policy dialogue achievements after 2011 in countries with close civic space

In countries where policy dialogue between the CS and the authorities is limited due to a lack of civic space, the EU promotes an enabling environment for CSOs through political dialogue with the authorities. The analysis of the roadmap shows that the measures taken in this area are proportionate to the situation and according to the degree of infringement of associative freedoms by the States.

- In Algeria, the CS roadmap indicates that, during meetings with Government representatives, including during related to the EU-Algeria Action Plan, the Delegation of the European Union and the Member States Members “consistently reiterate the key role played by civil society in promoting democracy, the rule of law, human rights and socio-economic development”²⁵⁹.
- Whenever projects funded face difficulties in their implementation because of interference from public authorities, the EUD can intercede with the authorities (Jordan²⁶⁰) or use official mechanisms for requesting further information and communication. In 2014 for example, the EUD in Algeria sent the Ministry of Foreign Affairs a joint note highlighting “the European Union's concern with the problems encountered by civil society during their compliance process to the

²⁵³ Written feedback from EUD

²⁵⁴ this does not include the policy dialogue grant programme led by EMHR as a targeted support

²⁵⁵ Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South (2012 – 2016), 2016

²⁵⁶ CS Roadmap in Palestine

²⁵⁷ Palestine CS Roadmap

²⁵⁸ Evaluation of the European Neighbourhood Instrument, Mid-term review report of the External Financing Instruments, 2017

²⁵⁹ CS Roadmap in Algeria

²⁶⁰ CS Roadmap in Jordan

new law and the uncertainties related to the silence of the authorities regarding the approval of a number of partner organisations of the Delegation of the EU and its Member States”²⁶¹.

- Finally, political dialogue can be enhanced when legislative measures are taken to explicitly limit associative freedoms. This is particularly the case in Egypt where The EU Delegation put great effort in engaging with authorities in the process of drafting new legislation on CSOs (NGO law)²⁶². This process spanned over years with several different drafts, due to changing regimes, but this law, and especially the 2014 draft, contained provisions of important concerns which led the EU to convey “messages on freedom of expression, association and assembly²⁶³”. Finally, in 2017, President Sisi signed into law the controversial new “NGO law”, which was approved by the Parliament without public debate. “The law retains the Morsi bill’s main provisions. Hence, it is extremely restrictive for both national and international NGOs and makes human rights work virtually impossible”²⁶⁴. The CS Roadmap in Egypt already concluded in 2014 that “the current transitional environment is not conducive to fostering in quantity and quality CSOs’ participation”.

Whereas the governments of Algeria and of Egypt are still reluctant to integrate CSOs in policy dialogue, it is important to note a positive step in Jordan. The EU support to civil society organisations’ programme was launched in 2014, aiming to strengthen policy dialogue between the government and civil society organisations and to improve their technical and advocacy capacity²⁶⁵. This was in respond to the situation outlined by the Evaluation of the European Union’s Cooperation with Jordan²⁶⁶: “An important actor seems to be missing in the overall aid coordination system: civil society and nongovernmental organisations, both national and international. There are no procedures or platforms in place for collaboration and consultation with civil society actors in the aid context on a systematic and structured basis”.

2. The second EU’s initial objectives relating to policy-level engagement with CS is to build a strategic partnership based on a structured dialogue. The challenge is to shift from a donor-recipient relationship towards a more political and strategic engagement with CSOs.

The donor-recipient relationship in place in all the countries of the region is led by the operations section of EUDs which holds meetings and consultation sessions with grant holders and potential applicants, to discuss EU programmes and calls for proposals. It is possible to see a shift towards a more strategic relationship, consisting of including systematic consultations to all levels of the EU programming cycle (cf EQ Relevance), as well as of responding to the objective related to the promotion of a conducive environment for CSOs.

In terms of effectiveness, the level of achievement regarding the strategic partnership through policy level engagement with the CS depends on the nature of the dialogue, the level of structuration and formalisation.

In this regard, EMHRN raised criticism in 2016 by reporting²⁶⁷ that these consultations were still “unstructured”, “informal” and sometimes “lacking transparency”, as “many CSOs are not aware of the consultations led by the EU”. Nevertheless, the analysis of CS Roadmaps shows in 2014 short-/mid-term achievements through policy-level engagement with CSOs. Although consultation modalities remain informal in Algeria and Israel, progress is highlighted in Morocco and Tunisia:

- In Morocco, the dialogue has evolved from ad hoc consultations of civil society organisations to more regular dialogue, including consultations occurring in the programming cycle. However, the Roadmap affirms in 2014 that “there is currently no real structured dialogue between the EU and Moroccan civil society”.

²⁶¹ CS Roadmap in Algeria

²⁶² CS Roadmap in Egypt

²⁶³ CS Roadmap in Algeria

²⁶⁴ Moonrises, J and Zenzi, M. ‘In search of a more efficient EU approach to Human rights: civil society and EU strategies in Egypt’, Med Reset, Working Paper #16, 2018

²⁶⁵ ENP Progress Report in Jordan, 2015

²⁶⁶ Evaluation of the European Union’s Cooperation with the Hashemite Kingdom of Jordan- Country Level Evaluation, 2015

²⁶⁷ Euromed Rights Network, “What space for civil society in the implementation of the ENP-South?”, Seminar report, 2016

- In Tunisia, the EMHRN project funded under the EIDHR - to sustain the tripartite dialogue between civil society, the Tunisian authorities and the European Union (2016-2019) - is expected to bring about a major step forward.
- In Palestine, EUREP has undergone a continuous way toward a structured dialogue with the CS, improving the consultation process for the CS roadmap in 2014 and 2018. Consideration must be given to the fact that the EU has constantly supported CS structuring and networking in Palestine. We can assume that the establishment of a structured political dialogue stems from these upstream efforts and achievements on CSOs networking (cf EQ Impact), on which the EUD seems to have built.
- In these three countries, the responses to the CSO Survey show a satisfaction of the respondents from these countries with regard to the EU's efforts in terms of policy dialogue with the CSOs and the attempts to construct a strategic partnership.
- At regional level, CSOs survey's responses appreciate the resumption of regional dialogue and underline its importance. The observation at the CS Forum South in Brussels in 2016²⁶⁸ and 2018, along with key stakeholders²⁶⁹ Interviews suggest that the EU's attempts to engage in a structured dialogue with the CS of the ENP South have had little effects.
- There is, first, little continuity between each edition as different organisations participate in each. Although it makes it possible to reach a larger number of organisations that are given the opportunity to express, it makes it more difficult to follow up recommendations and deepen them.
- A second set of reasons explaining why the effects of regional dialogue are limited comprises a low understanding of objectives of the Forum by the CSOs, an offset in expectations between EU and CSOs, and a difficult articulation between the national and regional levels. The other challenge lies in the lack of civil society capacities, resulting from a low knowledge of EU structures and initiatives and a low capacity to produce strategic inputs at the regional level, given the specificities of each countries.
- A real qualitative leap was made between 2016 and 2017 with the constitution of thematic groups²⁷⁰. The nature of the claims is much more qualitative in 2017 and is receiving more attention from the Commission. This is illustrated by taking into account the recommendations on the promotion and protection of LGBT rights, through the launch by the EU of a regional (confidential) programme under the EIDHR, with a contract expected in 2019²⁷¹.

The last phase of the structured dialogue between the EU and the CSOs in the ENP South starts in 2018 with the “regional hub”, a grant-funded programme led by a consortium of North and South NGOs and networks, and renamed as Majalat.

This grant framework corresponds to the demand of the main regional CSO networks (Euromed Rights, ANND, Solidar) to own the conduct of the dialogue process, in reference to the Euromed Civil Forum experience until 2010, in which they took part²⁷². The management of a grant and not a service contract allows the CS to conduct the dialogue, judging that the previous format of the Facility was too vertical because, according to the CSOs interviewed, it was too inspired by the Eastern model. This 3-year programme is seen as an opportunity to go beyond a stand-alone event, introducing more continuity and ownership.

²⁶⁸ I was, at this time, personally mandated by the University of Geneva to participate at the Forum and observe the EU/CS dialogue.

²⁶⁹ Representatives from Regional CS networks, DEVCO/DGNEAR

²⁷⁰ Concept notes and reports of the CS Forum South in 2015, 2016, 2017

²⁷¹ Interview with Alexandre Baron, CoTE-DG NEAR

²⁷² Interview with EMHRN representatives in Brussel, Nov. 2018

EQ4 Impact: To what extent have the EU's various forms of engagement with civil society in the Neighbourhood South contributed to the enhancement of participatory and inclusive democratic governance?

Judgement Criterion 4.1: EU's engagement with civil society has contributed to the increased capacity of civil society organisations and actors to perform their roles as independent development actors in each of the regions under evaluation

EU's support to CSOs, mainly through action grants allocated by CfP over the period in the region have enhanced EU's partners in a more professional way:

- As service providers, in all sectors and in particular on human rights (protection and rehabilitation / inclusion of victims of rights violations or discrimination). From the services provided to the direct beneficiaries, CSOs can build advocacy strategies.
- Professionalisation is particularly appreciated in terms of project management capacities. Strong dissemination of results-based project management, including more and more sub-granting, is seen
- This process of professionalisation supported by the EU can all the more happen through a long-term partnership with INGO.

Nevertheless, several limitations for long-term effects:

- Usual suspects: as access to funding is limited to organisations with existing capacity capital and level of professionalisation, the effects of the EU's financial support for CSO capacity relate to number of organisations acting as intermediaries between the EU and other organisations.
- There is no continuity in the funding of initiatives, because of the project approach and the competition of the CfP.

From the point of view of the CSOs, the commitment with the EU poses risks: The EU grants implies an important recourse to the salaried personnel for the implementation of the activities and the management of the project, which implies in return to enjoy at least financial stability to develop the organisation and activities on a sound basis, including with trained staff. This leads to a strong dependence on the EU and the donor community, the capacities of organisations fluctuating with the funding and the employees available. The lack of continuity in project financing and systematic competition between CSOs weakens most CSOs.

Indicator 4.1a	Aggregate achievement of long-term results delivered through targeted support
	<p>Regarding EU CSOs capacity development initiatives after 2011, the evaluation report (2016) concluded on the impact by arguing that the EU “globally responded to demands for enabling CSOs as governance actors through the development of a mix of instruments and channels, providing a menu of funding opportunities for CSOs, especially for those willing to become governance actors”. This assertion refers to the EUD survey responses that highlight the access to EU funding as an automatic lever for capacity building. Though, the 2016 evaluation on CSO capacity development initiatives could only identified concrete achievements at the individual level, i.e. among the representatives of the organisations. This is “illustrated by new ways of thinking (e.g. about the role and power of citizens, cultural norms, pluralism), acting (e.g. in terms of debating, dialoguing or engaging in public policy-making), and increased influence in norms, policy processes and governance practices”²⁷³.</p> <p>As for the CS Facility South, the report also argues that the effects of the capacity development component have been considerably limited due to a lack of institutional linkages with capacity building initiatives at country level. This evidence applies more broadly to regional programmes, as sampled by the ENP evaluation in 2013²⁷⁴ and the evaluation in 2016²⁷⁵. In both cases, the weakness of institutional set-up and steering between the regional and the country level is underlined due to a silo effect.</p> <p>Considering the long-term effects of the EU's engagement with civil society, the literature review and the various consultation activities conducted with CSOs and EUDs in this evaluation show that the main long-term outcome achieved through targeted support over the period is the increased level of professionalisation of the CSOs.</p> <p>1. CSOs professionalisation</p> <p>The professionalisation process started at least from 2008 as suggested by some ROM reports of targeted support in the sample, especially in Palestine and Lebanon.</p> <p>The professionalisation of CSOs is a process that changes organisations through two trends: a trend towards rationalising action, through the establishment of a results-based management and communication system, and an increasing reliance on paid staff within the organisation to implement and monitor activities.</p> <p>This phenomenon is highlighted in the thematic country assessments carried out until 2014 which show that CSO capacity building support of the EU (through grants and partnership follow-up, training...) usually focuses on the operational capacities of organisations - i.e. their capacity to deliver activities or services - and on their organisational capacities - i.e. their ability to absorb funds and their ability to report on projects for which they are funded. Evaluation reports, surveys and interviews with EUDs and CSOs highlight the broad dissemination of results-based project management within the CS (and even the administration), allowing them to improve their fundraising capabilities and the sustainability of their organisation. These sources converge to emphasise the professionalisation of the CSOs as a quality service provider to the most vulnerable., The high level of professionalisation is already recognised in 2008 in ROM reports, especially in Palestine²⁷⁶ and Lebanon²⁷⁷, but also in programme evaluation reports as in Algeria on small segments of civil society (child welfare)²⁷⁸.</p> <p>This professionalisation process is the combined effect of financial support and additional trainings that has been provided, in particular through the thematic instruments, with ENI having subsequently taken over. Interviews with CSOs and EU teams in Morocco and Palestine confirm that the identified themes for capacity building are based on the EU's specific management requirements, so that professionalisation is a process of acculturation of partner CSOs to EU management</p>

²⁷³ Evaluation of the capacity development initiatives in support of Civil Society in the Neighbourhood South (2012 – 2016), 2016

²⁷⁴ Euromed Youth, TRESMED

²⁷⁵ Khotwa, CSO WIN, We Gov!, Decent Work

²⁷⁶ Palestine: Protecting trade union rights and uniting efforts to influence socio economic policies, EIDHR, 2008

²⁷⁷ Action de Prévention et de Réhabilitation des Victimes de la Torture et autres Mauvais Traitements, durant leur Garde à Vue, leur Détention Provisoire et leur Incarcération, EIDHR, 2008

²⁷⁸ Mission d'évaluation finale du projet d'appui aux associations algériennes de développement (ONG II), 2011 ;

standards. The CSOs surveyed in Morocco, Israel and Palestine confirm that the experience of the partnership with the EU has helped them to strengthen as an organisation, given the required level of administrative and financial management requirements.

It is important to remind that the level of professionalisation of the CSOs varies from one country to another depending on the historical trajectories of civil society in each country, their relationship with the public authorities, and CSO supervision mechanisms put in place within the framework of State's social and development policies.

All the countries in the region have experienced a boom in the non-profit sector since the 1990s as a provider of quality services and play a crucial role vis-à-vis marginalised populations. These associations operate either in partnership with the State services (as an operation arm of the latter and instrument of legitimisation), or autonomously via the support of international cooperation. This seniority of the associative movement engaged in social action in the broad sense makes it easier to understand the trajectories and the way in which the EU contributions have had effects, in this case on the capacities to act as actors of autonomous development. Field missions were the main source of information.

Morocco: In Morocco, this professionalisation process seems to be limited to intermediary organisations that we have described previously (Relevance), as is more recently the case in Jordan. Overall exchanges with the EUDs in these two countries show the significant difference between a small number of capital-based organisations and the majority of organisations located in the regions. In Morocco, this problem was identified in the CS roadmap as "lessons learned" and is considered persistent, despite the many training provided over the period of the evaluation by the EU, the Member States and other national institutions such as the INDH. That is why the Moucharaka programme was conceived. The field visit was carried out in May 2019, at the beginning of its implementation.

Nevertheless, it is also from Morocco that it is possible to highlight one of the success stories: the EU contribution to the structuring of CS in the disability field, through the repetitive supports to HI so to accompany and strengthen the capacities of its local partners in the long run. HI and its partners were among the organisations that received the most action grants over the evaluation period. The method used by HI must be highlighted. HI partnered with local CSOs, implementing a rights-based approach that articulates the provision of direct support services to people with disabilities and victims of discrimination, along with advocacy activities, by facilitating CS networking to address policy issues. The longevity of the intervention of FHI in the region has allowed the creation and strengthening of local civil society organisations and networks (Ex in Morocco²⁷⁹, Algeria, Tunisia²⁸⁰). Highly trained and technically qualified, they adopt the same right-based approach, regards to their membership and their advocacy-oriented operations²⁸¹. This also contributes to reconfiguring the field of associations specialised in disability in these countries, traditionally engaged in charity and religious-motivated approach. If we had to do an analysis of the capabilities of the local CSOs we met, we could say that:

- Operational capabilities are high due to specialised service and quality service to the population.
- The organisational capacities are high since the local partners are able to manage EU funds through a team of trained employees, but are also organised around a militant base in a self-help model where community leaders share with users the status of people living with a disability. They organise themselves into a network.
- Institutional capacities are high insofar as organisations adopt a multi-stakeholder approach in the territories where they operate, by being actors of local governance as regards the provision of services responding to the needs of the populations. They are also structured as a network at the national level to be an interlocutor of the public authorities at sectoral level (social protection).

²⁷⁹ The NGO - Colombes Blanches – in Tetouan (North Morocco) and the « Collectif pour la promotion des droits des personnes en situation de handicap (CHDM), both funded by the EU.

²⁸⁰ « Organisation Tunisienne de Défense des Droits des Personnes en situation de Handicap » and « Collectif Tunisien pour la promotion des droits des personnes en situation de handicap »

²⁸¹ Evaluation of the USAID-funded programme: "Strengthening CSOs capacity to promote democratic reforms in Morocco" (SANAD), 2013; Evaluation finale externe du Programme Concerté Pluri-Acteurs en Tunisie (AFD), 2018

- Strategic capacities are high in that organisations are agents of change, defining long-term goals and intermediate steps by positioning and adapting to the political and institutional environment.
- attention must be paid to the fact that the movement is divided into several networks and remains divided for political considerations (objective and strategy of negotiation, relying or not on connections with the Palace to support the demands of the CS in the policy dialogue with the government) and leadership.

The case of the organisations that make up the feminist movement in Morocco is also noteworthy, although the trajectories are different. The movement is older and plural, composed of various women's organisations from political currents specific to the Moroccan left and far left. After the victory of the feminist movement in 2004 with the reform of the code of personal status (moudawana), Moroccan feminist organisations played a pioneering role in the care of women victims of violence through the establishment of reception centres in all regions of Morocco. Some organisations are regional-based (Tetouan, Fes, Marrakech). Others based on a national federative model through local sections. All of these organisations have received EU support, to varying degrees. The strength of the feminist movement lies in the militant commitment of its leaders, which helps establish the organisation over time, and the professionalisation of its advocacy techniques based on data collected and produced in the centres and analysed to uphold evidence-based advocacy work and public policy monitoring (observatory of violence), which proved to be impactful on legislative reforms and policy implementation.

Palestine: There is a long history of civic engagement in the occupied territories prior to the arrival of the PA. The example of PNGO testifies to the strong structure and high level of capacity of civil society, since PNGO was formed in 1993, and until now, as the main platform for dialogue within civil society and with the PA, and the donors (mainly the EU and the Member States). The PNGO experience is unique in the region. All the documentation on civil society in Palestine and the EU's engagement, as well as the interviews with the stakeholders met during the field visit, converge to attribute a high level of capabilities of the Palestinian CS.

Most Palestinian CSOs we interviewed, in West Bank and remotely in Gaza, are specialised on specific subject matters, adopting systematically a right based approach. This can be on specific HR violation, such as torture and ill-treatment on prisoners (Treatment and Rehabilitation Centre for victims of torture, Palestinian Centre for Human Rights), land grabbing / housing demolition (ARIJ, International Peace and Cooperation Centre), or a specific population group, such as women (Women's Centre for Legal Aid and Counselling), children (Al Dameer), or people living with handicap (Humanity and Inclusion, Palestinian consultative staff for developing NGOs in Jenin governorate association).

These organisations demonstrate a strong capacity to mobilise and train qualified human resources to meet the specific needs of the population and an ability to document these violations for advocacy purposes. For organisations acting as a service provider to specific population groups, the services offered do not find equivalence at the level of government services. As regards the documentation and publication of human rights violations by Israel, NGOs are considered as a credible source of information for the European Union and the Member States, but also by the Ministry of Foreign Affairs. works closely with civil society organisations on human rights. Finally, other organisations have positioned themselves more on the issues of governance and accountability of the Palestinian Authority and have imposed themselves, notably thanks to the repeated support of the EU, as legitimate interlocutors because of their monitoring capacity on public policies.

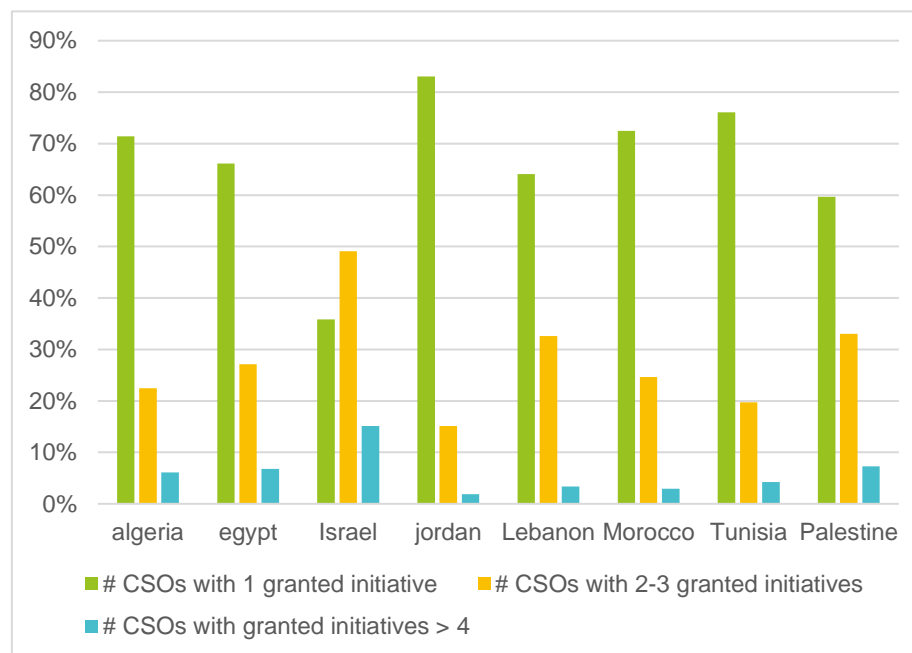
Israel: In Israel, the EU supports the community of CSOs working on human rights in connection with Israel's occupation policy in the territories but also in Israel. These organisations demonstrate an extremely high level of capacity, due to the technical expertise of the members, particularly in legal and judicial action, but also their political commitment, the involvement of a social base of volunteers. These organisations have the capacity to coordinate their actions with each other, and sometimes with Palestinian organisations based in the West Bank or Gaza. This point is particularly encouraged by the EU Peace Program even if it faces different types of constraints: Political threats to Israeli organisations, refusal of some Palestinian organisations to collaborate with Israeli CSOs as part of an "anti-normalisation" policy.

2. Limitations and challenges

2.1 Lack of continuity of EU financial support

One of the factors limiting the scope of the effects of the process of professionalisation of organisations is the lack of continuity of EU financial support:

Figure 7 Allocation of grants to local and national CSOs in the Neighbourhood South



Source: Evaluation team's analysis of CRIS data

In Figure 7, it can be seen that, with the exception of Israel, between 60% and 80% of CSOs in the CRIS database received only one grant action over the evaluation period, preventing to engage in a cumulative development process through EU financial support. However, it is necessary to nuance the scope of the figures in this chart since only the main applicants are referenced. However, interviews with CSOs during field missions reveal that most of them who received action grant as main applicant were also integrated as partners in at least one other project. On the other hand, the CSOs and the EUDs confirm that a phase 2 of a specific project never occurs and that calls for proposals do not facilitate the presentation of proposals that represent a continuation of an earlier action. The CSOs surveyed in Morocco and Palestine all indicate that the lack of continuity of funds for initiatives committed over a period of 2 or 3 years is a serious limiting factors and challenge they have to face to consider long-term effects.

The cumulative process of capacity development in project engineering and results-based management therefore concerns a minority of organisations, those with sufficient initial capacity to respond to CfPs, and who have acquired over time a broker position with the EU, so that the process of professionalisation merges with a process of concentration.

2.2 Competition's side effects

The process of professionalisation produces perverse and unexpected effects insofar as it accentuates the competition within the CS, and between the CS and the public

authorities, for obtaining financial resources. The strong institutional pressure on organisations can weaken many of them.

The EU financial support to CSOs generates the creation of a full-fledged economic industry in the partner countries, in varying proportions. The civil society sector (also called third sectors in economics) is economically structured around access to public funding, generating competition for access to its resources, reinforced by aid actors, such as EU, using competitive rules for grants allocation. The development of organisations is therefore based on their ability to formulate projects that meet the policies and requirements of funders. This requires the support of teams of trained employees who can meet the administrative requirements and ensure the implementation, management and monitoring of EU-funded projects. CSO need to maintain high levels of funding in order to remunerate and maintain trained wage earners. Staff turnovers are important in associations that operate according to a project approach, which prevent them from institutionalising knowledge and best practices. As each employee is dedicated to a specific project, the size of the salaried teams varies according to the number of funded projects running. In Palestine, the majority of the organisations interviewed describe a current context marked by the fall in funding, and claim to have reduced their paid staff at least by two.

The competition between CSOs for obtaining funding and the process of professionalisation weakens the associative sector in several ways:

- While CSOs have become independent actors of development vis-à-vis the public authorities, they depend on the international aid actors, especially in the context of shrinking space and of conflictual relations between the government / the state and the civil society supported by the EU.
- The competition contributes to make the salaried staff of the CSOs more precarious, thus leading to a high turnover which weakens the organisations. Indeed, the contracts of employment established over the duration of the projects do not correspond to the labour legislation in certain countries, as in Morocco. The competition and cost-efficiency considerations put in place by the EU weigh down on wages. Organisations must be perpetually in search of funds in order to best stabilise annual budgets to maintain salaries and cover operating costs induced by the management of funding contracts.
- These system logics favour donor driven behaviours which consists in adapting the initial associative project according to the donor priorities, relying on skills in project formulation.
- Competition does not favour synergies between organisations other than based on opportunistic behaviours. The Palestinian case is specific because of the occupation which favours both a strong politicisation of the civil society through coalitionist dynamics, but also a heightened competition for funds access. This is illustrated by the case of Oxfam, who recently received a grant from a CfP on the agriculture sector and was in competition with a consortium of Palestinian NGOs that included one of Oxfam's historic partners.

In any case, the organisations that strengthen themselves in the long term, able to overcome the negative effects of professionalisation, are those that have built up on a collective and militant basis (generally as an extension of political commitment), and have succeeded in maintaining its social capital while adapting to donor constraints.

Indicator 4.1b	Aggregate achievement of long-term results delivered through mainstreamed support
	<p>In terms of increased capacity, long-term effects through CfP-based mainstreamed support are similar to that for targeted support.</p> <ul style="list-style-type: none"> • Among these illustrations, the ENP evaluation report on the two regions (2013) refers to the capacity development undertaken through regional programmes on Youth. As for the Euro-Med Youth III Programme, the report points to “good results of the non-formal education projects in terms of intercultural learning, in the development of young people’s interpersonal skills and in fostering active citizenship. The impact of the programme in terms of capacity building of youth workers and organisations has resulted to be significant as well. Moreover, the Euro-Med Youth Programme has had an impact in the development of youth associative life and of both regional and sub-regional cooperation”. • Within the mainstreamed support sample of the current evaluation, six initiatives have a civil society component aimed at building capacities. The Technical Assistance to the Support to Rural Development Programme in Egypt (2011) - was monitored via ROM mission. The report states that the project is fully in line with the EU policy, development cooperation, partnership in the country and in the region. Some of the main priorities are good governance as pre-conditions for development and improved access to social services and protection of the environment. As a result, a CS capacity building component is included. Nevertheless, the ROM report focuses on the TA performance without regarding the CS capacity development aspects of the programme. • As for the EU Support to the Lebanese Electoral Assistance Programme (LEAP) for the 2013 Parliamentary Elections in Lebanon, a final report is available and states that, as expected, the project delivered training courses for civil society actors on areas relevant to future voter education preparations, “especially relating to the adoption of ballot papers and new electoral systems”. However, the report does not provide evidence of impact, on how these training generated new practices, procedures or intervention modalities among the beneficiaries.

Indicator 4.1c	Aggregate achievement of long-term results delivered through policy-level engagement
	<p>Achievements of long-term results delivered through policy-level engagement, in terms of CSOs increased capacity, could not be aggregated and identified with precision since the policy-level engagement takes place without result-oriented programming.</p> <p>The impact of policy-level engagement on capacity can be appreciated by considering throughout the period an accumulating process of a capital of participation and expertise, as well as the institutionalisation of consultation mechanisms.</p> <p>One of the main illustrations is the CSOs regional networks established in the 90s (e.g. EMHRN, ANND, Solidar), that have dozens of affiliates over the entire region, with a track record of advocacy campaigns, experience of EU funding and policy dialogue. They are the main regional CS stakeholders involved in all the EU Forums over the period and one of the main observers of EU policy in the ENP South.</p> <p>At the country level, the analysis of the ENP progress reports, and the interviews with EUDs' representatives shows that an increased and lasting participation of the CS in the policy dialogue with the State occurs when the CS structures itself in coalition and addresses more complex and policy-oriented subjects, especially in Palestine, Morocco, Tunisia and Lebanon.</p> <p>In Tunisia, the structured dialogue between the State and civil society has followed an extremely rapid evolution after 2011 and has been continuously encouraged by the EUD through the integration of a civil society component in sectoral programmes (cf Indicator 3.2a) and through the setting up of a tripartite dialogue on 4 priorities of the Action Plan (cf indicator 4.3a). The institutionalisation of dialogue and the strengthening of participatory practice offer great potential to capacity building long term achievements.</p>
	<p>Judgement Criterion 4.2: EU's engagement with civil society has contributed to the promotion of conducive environments for CSOs and broader civil society actors in each of the regions under evaluation</p>
	<p>The EU's contribution to creating an enabling environment for CSOs during this period can be described as weak:</p> <p>All countries in the region were hit by a wave of democratic protest, engaging some of them (such as Tunisia) in democratic transition processes. The EU was strongly criticised for its lack of engagement with civil society, democracy and human rights before 2011.</p> <p>The EU has distinguished itself in countries like Tunisia that have experienced a positive democratic transition process and its support has contributed to the creation of a favourable environment for CSOs.</p> <p>The EU's promotion of a CSO-friendly environment has had little impact in other countries in the region, where the general trend of reducing civil liberties has been observed, although to varying degrees.</p> <p>Not having the incentive of accession to promote a favourable environment - as is the case with the countries engaged in the enlargement process -, the EU has in the ENP region two levers: financial and political through a diplomacy of human rights. The differentiated approach is essential since there are two main categories of countries in the region, regarding CS environment: Countries in which the environment is historically and relatively favourable for CSOs and where the EU's objective 1 is not a priority (Israel, Lebanon, Palestine), (ii) the other countries with a strong authoritarian tradition and in which the action of the CS is highly regulated and controlled.</p> <p>Over the period, only Tunisia has evolved positively and joined the "club" of countries in which the environment is rather favourable. The other countries with an authoritarian tradition either sank in the civil war and the dictatorship (Syria, Libya, Egypt), or maintained a status quo, showing signs of opening while maintaining</p>

authoritarian practices (Morocco, Jordan , Algeria). Apart from the support given to the Provisional Government in Tunisia between 2011 and 2014, which has produced significant positive effects leading to a successful democratic transition, the financial support deployed by the EU as well as its human rights diplomacy has not influenced the institutional and political environment of CSOs in the ENP countries.

Due to the principle of enhanced differentiation and ownership, the EU's objectives are not applied in the same way, depending on the level of authoritarianism of the regimes or the degree of advancement in the democratic transition. In countries where civil and political spaces are open, the EU can deploy all instruments and forms of engagement at its disposal. On the other hand, with authoritarian countries, the EU is opting instead for a pragmatic line, pursuing cooperation with countries that are clearly falling back on the rule of law, arguing that dialogue can also be used to lobby for human rights concerns, and that continued cooperation is always more beneficial than lack of cooperation. This position has a cost, which is to subject the action of the EU to CSO criticism, expressed at national and regional level (CS Forum South), denouncing the EU contradiction between, on the one hand, the pursuit of ambitious democratisation objectives through support for civil society and, on the other hand, significant financial support for governments using authoritarian practices that often target CS, while acknowledging and deploring the fact that civic space has been shrinking in the region.

Indicator 4.2a

Aggregate achievement of long-term results delivered through targeted support

Targeted support is not the preferred form of engagement with CS to promote a conducive environment. Only CS support programmes, designed according to the objectives of the 2012 COM, have a component dedicated to this objective.

The NSA-LA/CSO-LA evaluation covering the 2007-2013 period worldwide, emphasises that the instrument has contributed to a deepening of relationships between different stakeholders. "In particular, the programme helped NSAs engage with state institutions at the national and sub-national scale, and with elected representatives. The programme has also helped LAs to engage more systematically with civil society"²⁸².

Country thematic evaluations all point out that the territorial approaches implemented through the NSA / CSO-LA instrument and then by ENI and favouring consultation at the local level have made CSOs credible interlocutors of local public authorities. The main limit that we have identified is the weak autonomy and weak capacities of local authorities, which offer little added value in terms of development policies and a player with little relevance for dialogue, while remaining indispensable for authorisations and avoid any blockage.

- Several studies and projects in Morocco have shown that devolution policies to local authorities and especially municipalities in terms of local development have not been accompanied by additional funding mechanisms. In this way, if municipalities are responsible for drawing up local development plans in consultation with civil society, their implementation depends on the budgeting process of the line ministries.
- In Egypt, there is not really a local authority with a certain autonomy, but deconcentrated governments at the governorate level.
- In Tunisia, the PASC included a grant for a component of developing CS capacities as actor of governance, but also a technical assistance to promote a conducive environment by working on the legal framework. According to the CS focal point, this technical assistance had little impact on the legislative process, which has been particularly chaotic, due to changes in governments and leading ministries. The latest orientations endorsed by the Ministry of Finance at the time of the field visit (registration of associations in the commercial register) are particularly remote from the recommendations produced by the EU and the CS, which widely mobilised. This example illustrates the overall situation in the region, which shows that EU financial support to CSOs does not have a positive impact on the institutional framework put in place by the state with regard to CS. The measures taken in all countries show, on the contrary, an opposite trend.

²⁸² External Evaluation of the Programme "NSA-LA", 2007-2013

- In Morocco, the Civil Society Facility program, which was a technical assistance to the EUD, paid little attention to this EU objective of promoting a conducive environment for CS, limiting itself to facilitating information meetings between institutions and CSOs and organising joint training sessions that bring together members of the CS and government officials. This approach of organising joint activities with the aim of facilitating dialogue between CSOs and state actors has also been adopted in Lebanon, but to a greater extent because several initiatives promoting democracy were designed in support to both types of actors, which facilitated cooperative relations development.

Indicator 4.2b

Aggregate achievement of long-term results delivered through mainstreamed support

In order to know whether mainstreamed support promoting a conducive environment for CSOs produces long-term effects, the first question is whether budget supports or sectoral supports are political levers, in this case influence the partner country in terms of civic space. The answer varies according to the political and relational configurations between the EU and each country.

- In Israel, EUD members surveyed indicate that financial cooperation with the Israeli government does not provide political leverage.
- In Morocco, the situation is different insofar as the importance of budget support to sectoral priorities constitutes a political lever that has made it possible to change the practices in terms of consultation between the State and CSOs. Each reform project or launch of new policy is based on a consultation of the EU and the state with civil society. Nevertheless, the policy dialogue is part of a broader power relationship between the EU and the Moroccan government. The latter has decided to no longer take part in the HR Committee of the Association Agreement, following the trade agreements on agricultural products and fisheries.

The EUD faces stronger pressure from the authorities in controlling funding to associations and choosing partners. As we will see more specifically in the following judgment criteria, the question of the choice of the partners and interlocutors of the CS for policy dialogue is first and foremost a political choice that strikes a balance between different political currents.

In Palestine, financial support to the Palestinian Authority is an essential lever which has also established the principle of prior and systematic consultation with civil society in the public policy development phase. This is apparent from the interviews with the PNGO Manager and the associations interviewed who are members.

Nevertheless, in these countries, several limitations have emerged from the interviews with the CSOs but also with the members of the EUDs.

- The first is the bureaucratic and top-down nature of the consultations, aimed to primarily meet the programming needs of the EU. In Morocco, consultations in the context of EU reform and sectoral support, though systematic, are carried out with limited resources, usually in capital, with few participants and no follow-up. When consulting with the state, they are often considered facade.
- In some cases, such as Morocco, EUD officials note that CSOs do not really engage in EU advocacy, and they do not consider the EU as a strategic ally in their attempt of policy dialogue with the Government. Only a few exceptions exist or emerge, notably in Morocco and Tunisia (Surveys, in-country Interviews), including Oxfam's partners (in country interviews in Morocco, Palestine).
- Access to information remains a challenge in all the countries of the region. While there are improvements in the consultation of civil society in the public policy development phase, access to information to monitor these policies by civil society is still problematic and limits the possibility for CSOs to play a watchdog role.
- Many associations in Morocco and Palestine engaged in policy dialogue highlight the political inconsistencies between EU financial support to civil society and to governments implementing reforms that are sometimes contrary to the interests and demands of CSOs partners of the EU, or even to international policy standards (case of the government plan for gender equality in Morocco).

Indicator 4.2c	Aggregate achievement of long-term results delivered through policy-level engagement
	<p>The challenge of EU cooperation policy with the ENP South is to bring about profound changes (in alignment with European standards) on the basis of peer partnership without a clear prospect of enlargement. This is what distinguishes the Southern Neighbourhood South from IPA countries. The EU's objective, since the beginning, was to recreate the success of enlargement processes in promoting democracy, stability and prosperity²⁸³. With the Southern Neighbourhood countries, the EU has two levers to engage at policy level with partner countries reluctant to address issues relating to democracy and civic space for CSOs: conditionality and diplomacy.</p> <p>Before exploring in more detail how the EU uses these two levers of policy level engagement and their effects on the whole region, it is important to highlight the Tunisian case that serves as a reference in the region in terms of successful democratic transition (though imperfect). In terms of policy-level engagement, the EU's contribution has been significant, especially since 2011.</p> <p>In 2011, after the revolution, the EU provided considerable support to the interim government led at the time by Bejji Caid Essebsi (who became president of the 2014 and died in 2019), in order to improve the legal framework and the rule of law before the holding of the first free and democratic elections of the Constituent Assembly. The EU also supported independent national institutions and civil society organisations to contribute to the democratic transition. This gave rise in practice to:</p> <ul style="list-style-type: none"> • The publication of a decree-law concerning the exercise of public freedoms and the relations between the citizens and the government, in a decidedly liberal orientation. • The mechanisms/instruments for holding, supervising and observing elections, including independent institutes and civil society observer networks. • The measures enhancing the rule of Law and initiated at the beginning of the transition process, served as the foundation for the rest of the process, providing favourable conditions for the development of civil society. • Nevertheless, while Decree-Law 88-2011, regulating CS offered an enabling legal framework since 2011, it was questioned in 2017 through several governmental attempts to reduce its scope, despite the EU technical assistance and political engagement to reforms, aimed at establishing a stable, comprehensive, legal and regulatory framework that is conducive to civil society. <p>1. Conditionality</p> <p>Before 2012, conditionality of the aid was present in the frameworks of the cooperation with the Southern Neighbourhood countries²⁸⁴. Within the framework of the Euro-Mediterranean Partnership (EMP), all the Association Agreements contained an “essential element” clause which would allow the EU to use a series of negative measures, from aid suspension to cutting off relations altogether, in cases of breaches of the fundamental principles underpinned in the Partnership. However, “throughout the years of the EMP, and despite the abundance of cases justifying applying some pressure, the EU never resorted to negative conditionality”²⁸⁵.</p> <p>Within the framework of ENP since 2004, The Commission introduced the concept of “joint ownership”, whereby “the EU does not seek to impose priorities or conditions on its partners. The Action Plans depended, for their success, on the clear recognition of mutual interests in addressing a set of priority issues”²⁸⁶. The ENP drew many of its tools (Action Plans, Country Strategy Papers etc) directly from the experience of the enlargement process in an attempt, among other things, to strengthen</p>

²⁸³ The European Parliamentary Research Service, “The ENP: an in-depth Analysis”, 2015

²⁸⁴ Abderrahim al Maslouhi, 2011. « Une conditionnalité sans effectivité. Clause diplomatique et gestion des risques dans les relations euromed », IEDMed/Euromesco, 1 papiers

²⁸⁵ Balfour, 2012. “EU Conditionality after the Arab Spring”, IEDMed/Euromesco, 16 papers

²⁸⁶ Perchoc, 2015. “The European Neighbourhood Policy : an in-depth analysis”, European Parliamentary research service

conditionality towards the countries on the southern shore of the Mediterranean²⁸⁷. Despite this new methodology introduced by the ENP, conditionality has not been applied further. Some countries have sometimes been criticised through diplomatic tools and the Common Foreign and Security Policy (CFSP), but negative measures have never been considered. The EU argues that the absence of dialogue and the breakdown of relations are always more damaging than a restricted dialogue leading to limited progress²⁸⁸. This will be further explored when interviewing EUDs.

With the revision of the ENP in 2011 and 2012, the EU reinforced the « more for more » principle through an incentive-based funding mechanism, designed as specific funds to reward good governance reform: such as the Support for Partnership, Reforms and Inclusive Growth (SPRING) in 2011-2013, Umbrella funds thereafter, that can represent up to 10% of the ENI budget. Once allocated, funds are added to the bilateral envelop for annual programmes. Another mechanism to support what is referred to as the incentive-based approach is the possibility to vary multiannual bilateral allocations within a range of not more than 20% of the indicative allocation. For the majority of academic observer²⁸⁹, the application of the 'more for more' principle and the consequent incentive-based mechanisms is quite "opaque": "Morocco and Tunisia both benefited from such funds, despite quite different patterns of transformation, while they were de facto postponed for Egypt, yet without making explicit the link to the deteriorating situation there. Eventually, the EUR 90 million was used to support a World Food Programme to feed children in schools – far from the SPRING governance objectives."²⁹⁰

Moreover, the question of the effectiveness of this incentive approach, as a lever of the EU's political dialogue with the partner countries, is not proven. The evaluation of ENI showed that the statements of the EUDs on this subject were much contrasted²⁹¹, with respondents, on the one hand, considering "the financial carrot" as inoperative (given the amounts of budget at stake) and with respondents, on the other hand, considering that this can have a symbolic effect of rewards for countries where there is a positive momentum.

2. Human rights and civil society diplomacy

EU diplomatic action is the other way in which the EU can promote a conducive environment for the CS. It is ensured by the DUEs and the EEAS since the Treaty of Lisbon in 2009.

The framework through which the policy dialogue takes place is the ENP which is based on the principle of differentiation, ownership and shared agreement. The Action Plan programming and monitoring system, based on technical sub-committees assessing the implementation of the Annual Action Plan (AAP), offers at each stage of the management cycle a space for dialogue between the EU and the national authorities²⁹², not only on the progress of the projects but also more widely on the progress made on political reforms, the situation of human rights and the participation of civil society²⁹³, which is then reflected in ENP Progress reports and annual reports on Human Rights and Democracy.

In some cases, where the political and institutional environment is unfavourable, negotiation around AAPs can be vigorous²⁹⁴. In Egypt, the sub-committees assessing the AAP resumed their functions in 2015 following their suspension after the uprisings of 2011. In 2016, Action Plans were replaced by Joint Partnership Priorities,

²⁸⁷ Blockmans, Kostanyan, Remizov, Slapakova, Van der Loo, 2017. "Assessing European Neighbourhood Policy Perspectives from the literature". Study commissioned by the Policy and Operations Evaluation Department of the Ministry of Foreign Affairs of the Netherlands, CEPS, Brussels/Rowman and Littlefield International, London

²⁸⁸ Balfour, 2012. "EU Conditionality after the Arab Spring", IEDMed/Euromesco, 16 papers

²⁸⁹ Blockmans, Hrant Kostanyan, Artem Remizov, Linda Slapakova, Guillaume Van der Loo, 2017. "Assessing European Neighbourhood Policy Perspectives from the literature". Study commissioned by the Policy and Operations Evaluation Department of the Ministry of Foreign Affairs of the Netherlands, CEPS, Brussels/Rowman and Littlefield International, London

²⁹⁰ Balfour, Fabbri and Youngs, 2012. Report on democracy assistance from the European union to the Middle East and North African, Eusprings

²⁹¹ Evaluation of the European Neighbourhood Instrument, Mid-term review report of the External Financing Instruments, 2017

²⁹² Perchoc, 2015. "The European Neighbourhood Policy : an in-depth analysis", European Parliamentary research service

²⁹³ Evaluation of the European Neighbourhood Instrument, Mid-term review report of the External Financing Instruments, 2017

²⁹⁴ Annual report on Human Rights and Democracy, 2015, 2016, 2017

negotiated between the EU and Egypt. The EU fought hard to retain the ability to fund CSOs²⁹⁵. The Egyptian government agreed to allow this after tough negotiations and after the EU agreed to marry CSO support to 'capacity development' for government institutions – aimed to make public administration more efficient.

The issue of the enabling environment is also addressed in a human rights diplomacy set up from 2012, in which delegations play a central role²⁹⁶. In 2012, the Strategic Framework for Human Rights and Democracy was approved, with the buy-in and support of Member States. In 2015, the EU Action Plan for Human Rights and Democracy (2015-2019) reflected the EU's strong commitment to address the threats to the enabling environment to civil society. In these frameworks, the EUDs are key actors at all stages of the policy cycle, from initial analysis of a given situation to general assessment of the situation in third countries, through policy development and programmes to implement the EU's objectives on political and human rights.

At the level of the Delegations, the main mechanisms and activities carried out to raise voice on human rights and civil society issues are listed in the CS Roadmaps and the Annual reports on Human Rights and Democracy. The main mechanism for the EU to raise voice is the subcommittee on Human Rights, Governance and Democracy. Otherwise, concerns on conducive environment for CS can be conveyed during high-level visits by the President of the European Council and the HR/VP. Locally, via the Office of the EU Representative, the EU "issues local statements, makes site visits and attends court hearings"²⁹⁷.

3. The dilemmas of the EU in its cooperation with authoritarian regimes and its objective to promote conducive environment for CSOs

According to the literature²⁹⁸, the EU faces several dilemmas, linked to the objectives of the complex democracy-security couple that apply to the Southern Neighbourhood, and the compromise between values and interests, regarding authoritarian regimes. The contradictions became obvious with the outbreak of the Arab Spring in 2011 and continued because of the strengthening (Egypt) or the maintenance (Jordan, Algeria, Gaza) of authoritarianism in some countries of the region where CSOs can hardly raise voice. The first dilemma regards the tension between developing "one size fits all" approaches and the differential treatment of countries. Some authors argue that this can lead to accusations of double standards, which in turn can undermine the credibility of the commitments and principles that the EU aims to promote.

Due to the principle of enhanced differentiation and ownership, the EU's objectives are not applied in the same way, depending on the level of authoritarianism of the regimes or the degree of advancement in the democratic transition. In countries where civil and political spaces are open, the EU can deploy all instruments and forms of engagement at its disposal without resorting to negative conditionality mechanisms ("less for less" principle). The articulation of the democracy-stability couple can operate positively and in accordance with the theory of change presented in the EU strategic policy documents, namely that support for democracy in the medium term ensures long-term stability.

On the other hand, in authoritarian countries, the question of resorting to negative conditionality arises. The EU opts rather for the pursuit of a pragmatic line, using the argument that dialogue can also be used to press for human rights concerns. The CS Roadmaps, the ENP Progress Reports and the Annual Human Rights and Democracy reports indicate that issues relating to EU "values" are raised at diplomatic meetings, at country level and worldwide. Interviews with political sections of EUDs in Morocco and Palestine confirms that consultations with CSOs are crucial source of information to feed the briefing notes that go into the diplomatic circuits of EEAS.

In the 2015 revised ENP communication, the 'less for less' principle was abandoned. The ENI mid-term review report found that although the focus on differentiation in the EU's relations with countries in the neighbourhood is realistic and pragmatic, the effectiveness of the incentive mechanism (conditionality) based on respect for the shared values of democracy and human rights is limited.

²⁹⁵ Cs Roadmap in Egypt

²⁹⁶ Balfour, "The role of EU delegations in the EU Human rights policy", DG-External Policies – Directorate B, Policy Department, 2013

²⁹⁷ Phrase-type présente dans toutes les CS Roadmaps.

²⁹⁸ Balfour, 2012. "EU Conditionality after the Arab Spring", IEDMed/Euromesco, 16 papers

This limitation has a cost, deriving from constant criticism from CSOs and Networks about the contradiction between seeking a strategic partnership with the civil societies and partnering with authoritarian leaders who restricts civil space and violate human rights, as reflected in debates observed during the CS Forum South in Brussels (2016 et 2018). Egypt is the country that concentrates most of the criticism of the double standard in the implementation of EU objectives, issued by observers and researchers in the region²⁹⁹.

With authoritarian regimes, the causal relationship between democracy and stability seems reversed and democracy appears a longer-term goal, implying constant but more limited objectives and means of engagement with civil society (whether in mainstreaming and policy level), while stability is deemed better guaranteed in the shorter term.

The push from CS - through studies and reports, and critical dialogue with EU representatives during CS Forum South - for negative conditionality highlights the weaknesses of the EU democracy assistance policy in the South region.

The lack of an accession perspective - present in the enlargement policy – seems to severely limit the EU's contribution to the promotion of conducive environments for CSOs in authoritarian countries of the ENP South.

Judgement Criterion 4.3: EU's engagement with civil society has contributed to the promotion of structured participation of CSOs and civil society actors in domestic policies, in EU programming cycles and internationally in each of the regions under evaluation

1. The shift made by the EU after 2012 was successful, with plenty and diversified financial and non-financial supports, available for CSOs willing to engage as governance actors and participate in policy process. This successful shift is based on NSA / LA's proven track record in local development, continued after 2012 in programmes dedicated to civil society support in the context of the promotion of participative democracy.

For the CS participation to domestic policies, there is progress in Tunisia, particularly under the action of Euromed Rights and its partners for tripartite dialogue, the first experience of its kind in the region. Many sectors in Tunisia in which CS engage in policy action are identified, as for Morocco. In Palestine, the level of capacity of the CS is relatively high in terms of participation in the policy dialogue.

In these three countries, the common point is the existence of strong CS networks and coalitions. Palestine and Morocco single out as countries with a deep tradition of network and associative movements. More recently in Morocco, is the success story of the associative movement on disability that has gradually structured throughout the evaluation period to become in 2019 a recognised interlocutor and listened to public authorities, and enjoying a strong institutionalisation (certain organisations have been designated to sit on the Economic and Social Council of Morocco or to be represented on the National Council of Human Rights).

The most effective networks are those built from a social action practice so to carry messages to public authorities or provide expertise during policy work. It is therefore important not to separate service and policy.

Finally, one of the essential variables that explain the difficulties of the policy dialogue between CS and State is politics. In Tunisia and Morocco and Egypt, where Islamist parties won elections from 2012, relations between the government and the EU's CSOs have deteriorated significantly, based more on confrontation than cooperation, and denouncing government action.

If the participation is not structured, the fact remains that some organisations have social capital of influence allowing to participate informally in the policy dialogue, because of all sorts of affiliations (political) and interpersonal interconnections.

²⁹⁹ Euromed Rights Network, EU-Egypt Bilateral Relations: What Scope for Human Rights Advocacy? June 2016

In countries with limited civic space, policy dialogue is possible, with strong control by the regime, and in areas or sectors defined by the regime (usually social sectors). In these contexts, the regional programmes have also shown their usefulness in giving more space for dialogue.

2. Structured CSO's participation in EU programming cycles

There is no country in the region where the EU is engaged in a structured dialogue with the CSOs. The consultations take place during the programming phase of the financial support. But there is no real policy dialogue between the EU and the CS on government action, as consultations with the CS in the context of EU support for government (budget support) are taking place only once at the time of programming, more like information sessions.

Palestine is the country closest to this achievement of a structured policy dialogue due to the historical presence of CSOs' platform for dialogue and the continued support provided by the EU to the various networks structuring the Palestinian associative field. Progress is recorded in Morocco and Tunisia, but depends on CSO capacities by sector. In Tunisia, one must consider both the inexperience of the majority of CSOs and the weight of certain national organisations such as the UGTT.

Finally, in countries with limited space, the objective of a structured political dialogue involving civil society is unrealistic, and priority is given more to political dialogue on the issue of human rights.

Indicator 4.3a

Aggregate achievement of long-term results delivered through targeted support

In 2012, the European Union re-evaluated the role of civil society and changed its policy regarding its engagement to it. Beyond the role of the CS as a service provider to the most vulnerable, EU support to CS focuses on the meaningful and structured participation of civil society in government policies and democratic processes.

3. This shift can be seen at the instrument level and in most of the countries in the region.

- As regards NSA/CSO-LA, a larger amount of funds is allocated towards democracy, involving support for CSOs as governance actors, than to service delivery. This is confirmed in Palestine³⁰⁰ where a progressive shift from CSO engagement in service delivery to CSO engagement in policy and governance occurred over the period. While Palestine is a forerunner in this area, because of the specific place occupied by the CS in relation to the state under construction, this shift has been systematically applied in the ENP South Region after 2011, when circumstances permit (absence of war).
- Throughout the period of the evaluation, EIDHR seems to know a reverse phenomenon with considerably more support to human rights related actions focusing on the protection and the rehabilitation of victims of violations, than those supporting democracy (outside the electoral assistance that takes the most important part), which is rather included under CSO-LA³⁰¹.
- This is confirmed by the analysis of the sample, which has no virtue of representativeness, but which presents the same tendencies. In the sample of 36 targeted supports, 17 are funded under EIDHR and NSA / CSO-LA. Within these initiatives we can distinguish those (1) that are more oriented to service delivery (to target groups), (2) those that are more oriented towards objectives of democracy and governance through the participation of civil society, and (3) those that offer a combination of two. Within this group of targeted supports funded by EIDHR and NSA / CSO-LA, 66% of service provider initiatives are funded by EIDHR while 64% of democracy-oriented or "mixed" initiatives are covered by NSA / CSO-LA. After 2011, the ratio is 83%. EIDHR distinguishes itself by covering 83% of local CSOs targeted (6 out of 17).

³⁰⁰ Evaluation of the European Union's Cooperation "with the occupied Palestinian territory and support to the Palestinian people" 2008 – 2013 as well as the "review of the effectiveness of NSA-LA in Palestine between 2007 and 2011"

³⁰¹ External Evaluation of the European Instrument for Democracy and Human Rights (2014 – mid 2017) Final Report Volume 1 – Main Report, June 2017

According to the NSA-LA evaluation report covering the 2007- 2013 period at the global level, the instrument has contributed to a deepening of relationships between different stakeholders. “In particular, the programme helped NSAs engage with state institutions at the national and sub-national scale, and with elected representatives. [...] The programme has also helped LAs to engage more systematically with civil society”. However, the evaluation also concludes that “there is not yet much evidence that the programme is contributing to the emergence of a civil society ‘watchdog’ role”.

This trend has been confirmed after 2011 and highlighted by the evaluation on EU CSO development of capacities (2016): “there are clear indications in several countries that government authorities at central and local levels increasingly acknowledge civil society’s role in governance. The evaluation observed significant changes at individual level, whereby civil society actors acquired a better understanding of their rights and responsibilities, were empowered to speak out and engage in public policy processes or advocacy work. The emergence of new CSOs is a sign of the spreading awareness of the possibility of change at organisational level. The wide range of capacity development activities fostered by the EU through its various instruments has doubtless contributed to ensuring a critical mass of CSOs able and willing to engage in policy debates, at all levels. There are also signs of the emergence of civil society networks at national and, more timidly, also at regional level”.

4. With regard to policy work at a national level, and at the level of the organisations we have met, mainly during field visits, we can say that the CSOs' capacity to participate in domestic policies corresponds to the possibility of mobilising three types of legitimisation resources: extended social base, service to people, technical and sectoral expertise

The main achievements in policy work that we have seen, led by EU partners, come from an organisational and associative model that articulates service and advocacy, militant and professional organisation. We can then speak of associative movement. This is the case of the associative movement on disability and the feminist movement in Morocco, some of whose representatives were interviewed during the field mission. Organisations provide both services to victims of violence or discrimination and collectively lead, in the form of a network, platform or coalition, advocacy campaigns related to the policy making and monitoring process. These organisations combine the three sources of legitimacy mentioned above. They develop a social base broadened by aggregation within the framework of a collective dynamic based on the rights-based approach and they provide individually or in a network (e.g. from the Anarus network in Morocco) a certain number of services to users or beneficiaries, from which they derive their legitimacy and expertise in order to engage in influential political actions.

This is also the case for most organisations encountered in Palestine and Israel. Except for those specialised in monitoring, most organisations, working in particular in human rights or in a straight-line approach, articulate services and advocacy. The provision of services to the population (women, children, migrants, people with disabilities ...) is one of the main sources of legitimacy of the CS to dialogue with state actors. Nevertheless, Palestine differs from other countries in the region in that CSOs create many thematic coalitions that act periodically according to legislative and regulatory work or as part of ad hoc communication or awareness activities.

The EU's political shift poses a risk insofar as it separates service and advocacy, removing a potential source of legitimacy for organisations. This is particularly the case in Palestine, where the EU and its partner PNGO consider that services to the population should progressively become part of the State domain in a public service approach, leading the CSOs to focus on the watchdog role.

Many organisations met during field missions, particularly in the field of human rights, have expressed their difficulty in financing their service activities and have expressed their concern that they will no longer be able to finance them the future, in the context of the EU shift and the withdrawal of USAID and the FORD Foundation, leaving the EU as the main donor. Among the organisations surveyed, some of them consider that they hold important know-how that cannot be fully conveyed to the administration and that has an added value in relation to the functioning of an administration. Others disagree fully with the approaches developed by the state (the case of violence against women in Morocco).

As for the regional programmes, two evaluation reports addressing civil society converge toward the same conclusion and notice a lack of evidence of long-term effects (even prospects). The Evaluation of the European Union’s Support to two European Neighbourhood Policy Regions (East and South) argues in 2013 that “the resources available for each regional project are too small and the actions too diverse to have a great immediate impact at either regional or national level”. In 2016,

the evaluation report advances the same conclusion pointing at unclear articulation between regional initiatives and the roadmaps as well as limited interaction between EU channels used for capacity development.

Concerning the contribution of the EU's engagement with civil society through targeted support to the promotion of a structured participation in EU programming and domestic policies, a specific initiative must be highlighted: the initiative led by the Euromed Rights Network to sustain the tripartite dialogue between civil society, the Tunisian authorities and the European Union, started in 2016 for 3 years, under EIDHR grant³⁰². This type of programme is unique in the region because of the particularly favourable conditions in Tunisia. Capacity building activities are followed by structured dialogue activities, organised by thematic working groups, involving regional conferences and consultations. It is still too early to draw conclusions on this new pilot initiative, but its existence testifies to the quality of the political dialogue between the EU, the Tunisian government (despite a certain instability) and the civil society.

- The case of Tunisia and of the Euromed Rights Network is particularly interesting in that it shows the crossroads or the synergies that take place between the different forms of EU engagement with civil societies at national level but also at regional level. For example, mainstreamed supports to CSOs in the areas of Justice and Migration in Tunisia (cf indicator 3.2a) are to be linked to the targeted support to Euromed Rights Network, establishing tripartite dialogues (EU, State, CS) on these two priority sectors (in addition to Gender Equality and Economic and Social Rights). While mainstreamed supports generally refer to the service provider function of the SC, this specific tripartite dialogue project involves more human rights activist organisations and their advocacy role.
- At the CS Forum South, - Majalat³⁰³ - observation in the migration group shed the light on different positions or even divisions within civil society, between those positioned on the implementation of public policies corresponding to the EU agenda (care and support provided in the south shore of the Mediterranean Sea, of migrants and of people returned to their countries) and those denouncing the migration policies of the EU and the Member States considering that they are partly responsible for human rights violations and non-respect for human life of migrants. This subject of migration is very sensitive insofar as it is part of the main rationale justifying the revision of ENP in 2015.
- The EU supports all the dynamics of civil society positioned on this thematic: those more engaged as service providers and mainstreamed in the migration sector, and those who are more advocacy-oriented and more critical of the EU in the framework of a structured tripartite dialogue.

Nevertheless, one of the limitations of promoting a structured dialogue is to model standardised methods by ignoring existing practices of stakeholder participation. If this case could be observed in Tunisia (PASC), others like in Libya are even more obvious: The case of Libya³⁰⁴ is interesting to the extent that the emerging lessons stress on the relationship between ownership and sustainability, when normative approaches to change, in terms of dialogue and consultation, are confronted with endogenous dynamics and practices. When stressing on the lack of sustainability prospect, the ROM report illustrates: "In many cases, the participation of CSO and government officials in project activities is based on individual or group interests rather than on structured national dialogues or policies. The original objective of this project was, in fact, to do so the other way round."

Indicator 4.3b	Aggregate achievement of long-term results delivered through mainstreamed support
<p>As already mentioned, the conditions for a policy dialogue between CS and the Government is not a matter of technical capacities but rather, as we will illustrate it through the cases of Morocco and Palestine, a matter of politics and of interpersonal relations.</p> <p>Morocco: Policy dialogue is linked to the balance of power among different political affiliations that are played out in society and in the relationship between the Government and the civil society. The EU support to Moroccan CS has historically benefitted CSOs voicing against the state (without being dissenting) by adopting a</p>	

³⁰² Not included in the sample

³⁰³ a consortium-led programme in which EMHRN, ANND and Solidar are key stakeholders

³⁰⁴ Support to Civil Society in Libya, ENPI, 2011

right-based approach, in an expected role of watchdog. This civil society, of which the Moroccan feminist movement is part, is carried by activists from the Moroccan left, bearing democratic demands for equality in opposition to the regime and political Islam. When an Islamist party is at the head of the government as a result of democratic elections, as the case in Tunisia, Morocco and Egypt after the democratic protests of 2011, then the policy dialogue between the CS, partners of the EU, and the Government is more challenging.

In Morocco, the Equality Plan was prepared by a first government and then revised and implemented by another Islamist government, with the support of the EU as the main financial and technical contributor to the Ministry of Social Affairs.

Within this Plan, priority is given to the fight against violence against women, a topic on which the feminist movement has been working since the end of the 2000s following the victory of the reform of the personal status code (moudawana) in 2004. The feminist movement set up a network of Call, Reception and Rehabilitation centres for women victims of violence in the main cities of the country, and who had received support from the EU and the Member States (Spain, France). The governmental Plan aims at supporting centres newly established by the Ministry and run by "politically affiliated" or "governmental" organisations that would promote mediation and conciliation among couples and families in cases of proven violence (a key point of disagreement with the feminist movement, calling for legal procedures). On the other side, The Ministry also intends (interviews) to create an observatory gathering a broad range of stakeholders, while the feminist movement has long established an independent observatory of violence against women, using it as its evidence-based advocacy instrument to the Government.

We can therefore say that the government's engagement to equality, for the fight against violence against women, is in itself a major achievement of the pioneering and operational role of the Moroccan feminist movement (combining service delivery and evidence-based advocacy). Nevertheless, the political oppositions between the government and the CS lead the first to reorient the policies while marginalising the protesting CSOs.

Palestine: The case of Palestine shows an anteriority of the associative movement, through a political structuring resulting from the different political currents, in particular within the Fattah and on the left more widely, in competition with the Islamists thereafter, during all the period of the occupation from 1967 to 1993.

Palestine has a long history of voluntary-based civic engagement, and community-based organisations due to the occupation and the liberation movement. Some of the organisations we have met are still structured according to a federative and democratic movement's model, i.e. based on membership and local sections electing their representatives to the national level of the movement.

1993 and the Oslo Accords saw the establishment of the PA in Palestine, composed of elements of the PLO in exile but also of strong local forces. Many of the founders of CSOs interviewed participated in the political process of the Oslo Accords, others took office at ministerial level. There is a lot of circulation but also competition between the administrative and political staff, and the CSOs representatives. There is thus a form of unstructured but rather interpersonal dialogue between people with cross-trajectories, as many representatives of the organisations declared having or receiving on a regular basis draft law or government projects from Ministers themselves for consultation and advice.

Indicator 4.3c	Aggregate achievement of long-term results delivered through policy-level engagement
	<p>The EU / CSO relationship is a relationship that remains structured on the donor / funds recipients' model. Civil society is systematically consulted in the programming phase to define the CfP guidelines for action grants. Consultations are carried out in relation to EU financial support. On the other hand, with regard to the programming cycle for EU budget support to the Government, the CS is also consulted, but only occasionally, at the minimum of what the procedure requires. Negotiations on the reforms carried out by the government are done with the government and the EU. Only in Tunisia is an attempt to establish a tripartite dialogue.</p> <p>Thus, the EU's engagement with civil society and with the government is parallel and distinct, and EU policy-engagement with the CS is very weak. The question is whether the EU's commitment to the 2012 COM changed the relationship to a strategic partnership, beyond financial support and through political support. The conclusion of the 2016 evaluation of EU support to civil society in this region states:</p>

“While there has been a qualitative leap forward in relations between the EU and CSOs/partners, the different actors consulted do not consider that the EU is open / in a position to develop truly ‘strategic partnerships’ At all levels, there is quite some potential for more structured interactions and coalition building on shared agendas that remains untapped.”

This conclusion needs to be nuanced with respect to Palestine, Morocco and Tunisia. The light of these two cases shows us that policy-engagement is possible when there are existing organisations with national or sectoral legitimacy, able to engage in sectoral policy.

EQ5 (Sustainability): To what extent have the changes to which EU support have contributed proved to be sustainable after the end of EU funding?

Judgement Criterion 5.1: The results achieved through the EU’s support and engagement with civil society allow the beneficiary organisations and actors to continue to operate as effective actors in the civic and governance realms.

In the EU documentation and interviews with EUDs, the sustainability of the effects in support of civil society is appreciated with regard to the continuity of financial support for the initiative undertaken, beyond the duration of the project. However, we have already shown that the use of action grants through CfS does not favour long-term support for organisations, whereas initiatives on qualitative long-term processes (capacity building, policy dialogue) require repeated support. The sustainability conditions of the actions undertaken are also presented from the capacities that are strengthened, and mainly the capacities of raising, managing and absorbing EU funds, as presented by the EUDs in Egypt and Lebanon, and most ROMs reports.

The duration of effects is observable for organisations that are engaged or have been engaged in a professionalisation process. But the sustainability of the effects also depends on the level of development of the beneficiary organisations and the share of the EU funds in their organisation. If the EU-funded project falls into one of the organisation's strategic objective, this means that the organisation has a strong capacity to raise funds and can bear the financial risk of not renewing EU funding. The EUDs seek to avoid in their selection of proposals targeted actions, limited in time and which does not correspond to the project of the organisation as a whole.

Here is often a problem of design in the comprehensive support programmes for civil society, generally being conceived around a diversified service offer in order to stick to the needs most, but without being oriented towards changes and without taking into account the process dimension inherent in the development of capacities, nor the organisational trajectories of CSOs.

The most important effects concern a limited number of organisations, able to position themselves on several CfPs at a time and to manage several EU grants at the same time, implementing sub-granting mechanisms. These are intermediary organisations at national or regional (subnational) level, serving as intermediation between the EU and the rest of the organisations.

As far as enhanced participation of the CS is concerned, the effects are all the more sustained as long as this participation is structured within network and coalition framework. Political dialogue involving civil society is a long-term process, involving sustained support at the organisational level.

Indicator 5.1a	Extent to which the capacities developed under EU support are sustained.
1) At project (sample) level	

Unsurprisingly, the interventions of the sample for which the ROM reports already praised the efficient management because of the strength of the grantees (in Palestine³⁰⁵ and Lebanon³⁰⁶), also highlight the fact that the strengthened capacities will be all the more durable as the initial level was high. They point out that fundraising capacity of the local partners and their ability to absorb and manage the external funds are adequate. They are on the right track to capitalise upon the project achievements and ensure follow-up of the project results in a professional manner.

The situation is different in Algeria³⁰⁷, given the small number of donors engaged with civil society, which often compromised the continuity of actions.

2) At programme level

The 2016 EU CS capacity development initiatives refers to sustainability as the “Achilles heel”. It points at weaknesses in the interventions’ design: “most capacity providers tend to focus the M&E on the realisation of activities and less on more qualitative analysis of possible (intermediary) results. This in turns hampers capitalisation of lessons on “what works” as well as adaptive management. Most of the EU interventions tend to have a short duration (linked to projects). This hampered the ability of stakeholders to pursue and consolidate the promising pilot initiatives while the mobilisation of appropriate resources remains extremely difficult which hampers the autonomy of such initiatives”. The report also stresses on the lack of institutional linkages between the various range of capacity development initiatives at both country and regional levels, which led to missed opportunities of synergies to foster a process of change. One good practice was identified with EED, which provides support to partners in networking with other donors to ensure sustainability of actions.

3) General appreciation at the regional level (based on USAID CSO Sustainability index)

USAID has developed a CSO Sustainability Index Scores, aggregating several criteria to measure change in sustainability. In the MENA, the index covers only 5 countries (Egypt, Jordan, Palestine, Morocco and Lebanon) from 2013 to 2017, examining CSOs situation beyond USAID’s partners.

In general, it is interesting to note that trends are stable in the countries concerned, with no major change over the period. All countries indicate a cumulative score between 4 and 6, between an evolving sustainability and an impeded sustainability.

- The Palestinian and Lebanese CSOs have the highest level of capacity, with the most promising status in terms of sustainability
- On the other hand, the CSOs in Egypt and Jordan present the most worrying situation with a significant risk that the increased capacities will not be sustained.

Finally, the CSOs in Morocco present a contrasting situation. On the one hand, their organisational and financial capacity impedes their sustainability, with little change over the period. On the other hand, they have more encouraging advocacy and provisioning capabilities, showing progress made on that matter.

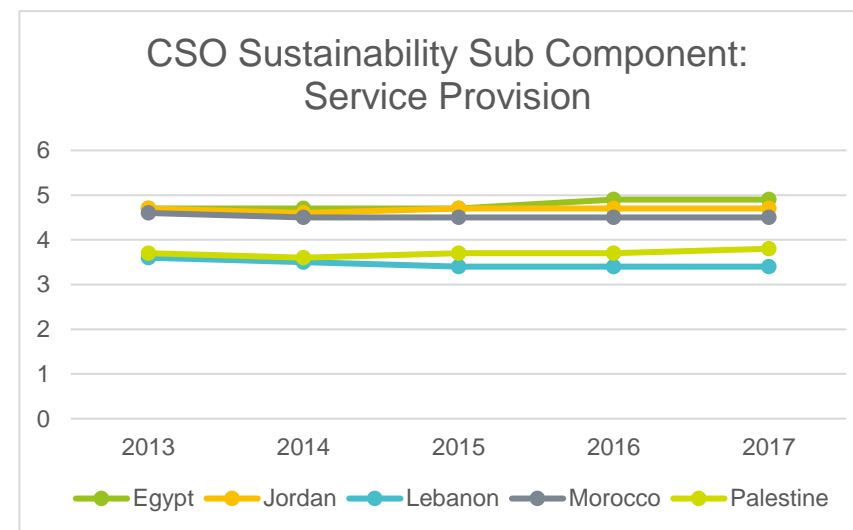
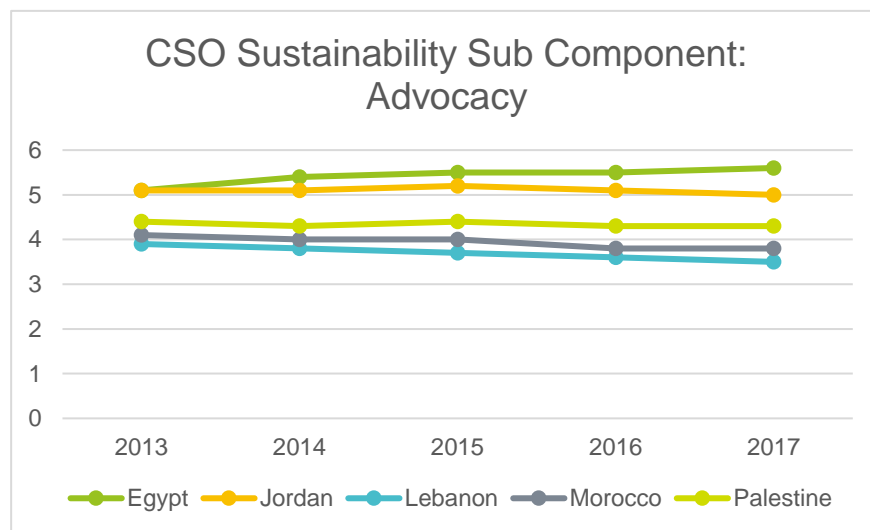
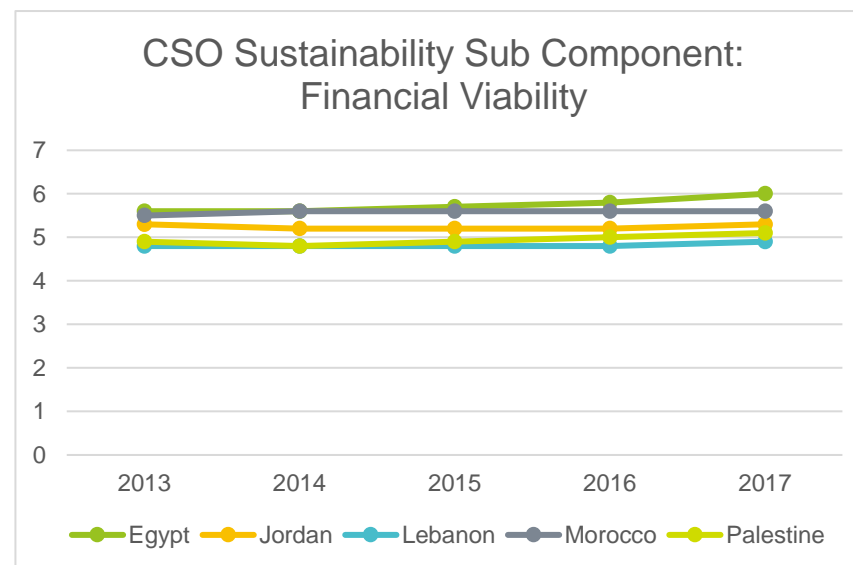
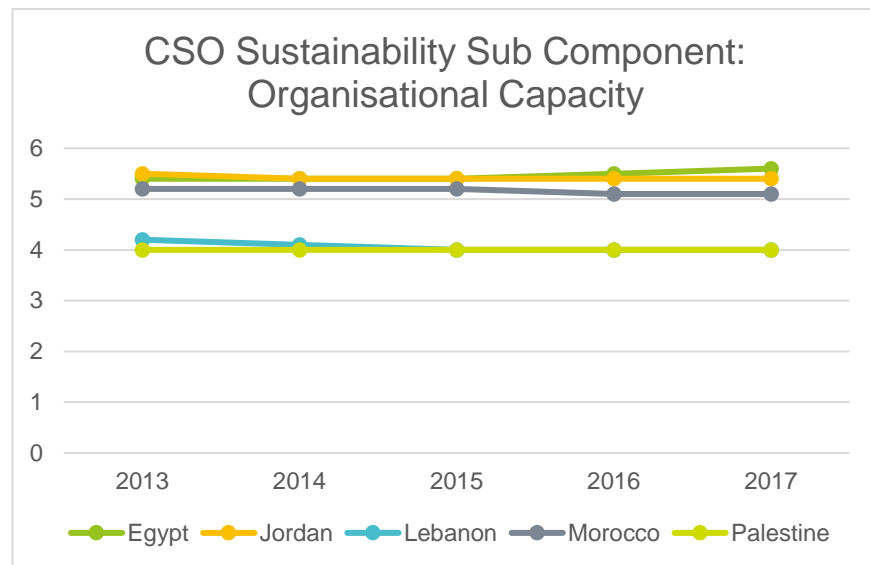
As regards CS capacities, the CSO Sustainability Index regards organisational capacities, financial viability, service provision and advocacy. The score grid is as follows:

¹⁸⁴ Protecting trade union rights and uniting efforts to influence socio economic policies, EIDHR, 2008

³⁰⁶ Action de Prévention et de Réhabilitation des Victimes de la Torture et autres Mauvais Traitements, durant leur Garde à Vue, leur Détention Provisoire et leur Incarcération, EIDHR, 2008

³⁰⁷ «Michwar pour le dialogue» : Création d’un laboratoire d’expériences pour le Vivre ensemble soutenant l’émergence d’un dialogue entre société civile et autorités, CSO-LA, 2016

Figure 8 Trends in sustainability of CSOs' financial, organisational, advocacy and service provision sustainability in Neighbourhood South countries, 2013-2017



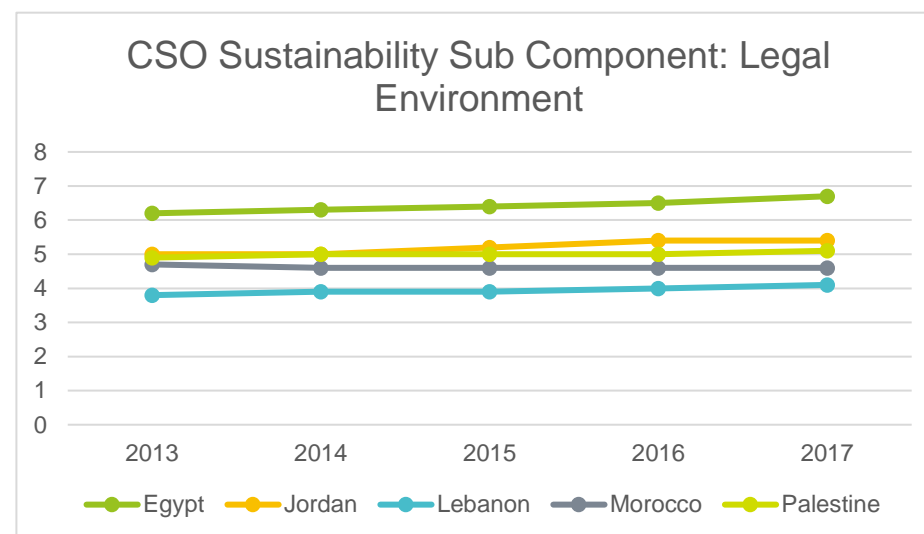
Source: Landell Mills' analysis of USAID CSO Sustainability index data , 2013-2017

Sustainability enhanced		Sustainability evolving		Sustainability impeded	
1.0-2.0	2.1-3.0	3.1-4	4.1-5	5.1-6	6.1-7

Indicator 5.1b	Extent to which the achievements seen in creating an enabling environment for civil society are sustained.
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The documentation indicates that the sustainability of the results achieved through the EU's support and engagement remains fragile. The documentation systematically refers to the shrinking civic space in the region.

Figure 9 Trends in sustainability of the legal environment for CSOs in the Neighbourhood South countries between 2013 and 2017



Regarding the legal environment, the scores of the CS Sustainability Index show great stability in the region and throughout the period and impedes the sustainability. The most concerning situation is in Egypt. Since Lebanon is between “sustainability evolving” and “impeded”, one can assume that Tunisia, as regards Neighbourhood South countries, would be the only country where sustainability is positively evolving.

Sustainability enhanced		Sustainability evolving		Sustainability impeded	
1.0-2.0	2.1-3.0	3.1-4	4.1-5	5.1-6	6.1-7

Source: Landell Mills' analysis of USAID CSO Sustainability index data , 2013-2017

Indicator 5.1c	Extent to which the achievements seen in enhanced involvement of civil society in the policy sphere are maintained.
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There is a problem of continuity of funding when advocacy, strategy and capacities rely on the provision of services.

Despite the quality of services provided to the population, the effects at policy level are limited insofar as the supports provided are punctual and often isolated, assuming that advocacy is more effective when it is collective and long-term. Organisations need to be able to adapt objectives and modalities according to the institutional and political context, which implies a continuity of financial support³⁰⁸.

³⁰⁸ ROM report of the programme in Lebanon, Action de Prévention et de Réhabilitation des Victimes de la Torture et autres Mauvais Traitements, durant leur Garde à Vue, leur Détention Provisoire et leur Incarcération, EIDHR, 2008

The extent to which the enhanced participation of CSOs in policy sphere is maintained relies on the coalition/network building process. This is a key channel for structured dialogue involving CSOs, as this can be observed in Palestine, Israel, Morocco and Tunisia.

Judgement Criterion 5.2 The design and implementation of EU interventions and activities have facilitated sustainability.

Criteria and sustainability conditions are mainly presented in the project documents and in the responses of the surveyed EUDs, from the point of view of continuity of funding. In this sense, the dominant idea is that the EU funding management experience complemented by targeted training activities strengthens the funding capacity of local CSOs to ensure the continuity of their activities. Capacity building can be done as part of a transfer of competence within a partnership between an INGO and one or more CSOs.

The analysis of ROM reports shows that the sustainability factor common to all projects is the level of ownership by local partners, without indicating that a strategy in this sense has been launched or even defined. For EUDs, sustainability is a requirement in the identification of the actions as project proposals are required to develop phasing out plans. Phasing-out modalities are explicated in the final report of the project provide by the beneficiary recipient. Nevertheless, interviews with EUDs show that there is no follow up so to verify whether phasing-out measures have contributed to the sustainability of the intervention.

Finally, there is a broad consensus within the EUDs and CSOs that the very nature of some activities is a challenge in terms of sustainability:

- The provision of services to vulnerable or victims of human rights violations is an alternative of civil society to the absence or poor quality of the services provided by the administration. The associative action is a response to an institutional lack. This requires continuity of support as long as needs are present.
- support mainly related to capacity building, advocacy and lobbying initiatives would be difficult to take necessary phasing out measures and ensure sustainability.

Indicator 5.2a

Phasing-out measures were developed and deployed.

Criteria and sustainability conditions are mainly presented in the project documents and in the responses of the surveyed EUDs, from the point of view of continuity of funding. In this sense, the dominant idea is that the EU funding management experience complemented by targeted training activities strengthens the funding capacity of local CSOs to ensure the continuity of their activities. Capacity building can be done as part of a transfer of competence within a partnership between an INGO and one or more CSOs.

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- The provision of services to vulnerable or victims of human rights violations is an alternative of civil society to the absence or poor quality of the services provided by the administration. The associative action is a response to an institutional lack. This requires continuity of support as long as needs are present.
- support mainly related to capacity building, advocacy and lobbying initiatives would be difficult to take necessary phasing out measures and ensure sustainability.

Indicator 5.2b	Effective liaison over sustainability was conducted with key stakeholders in the civil society, governmental and international donor spheres.
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EQ6: (Coordination, Complementarity, Coherence): To what extent have the various forms of EU engagement (including policy dialogue and financial support) with Civil Society in Enlargement, the Neighbourhood regions and Russia been effectively coordinated, complementary, and coherent with the activities of EU MS and other donors?

Judgement Criterion 6.1: Links between policy work, multi-stakeholder dialogues (e.g. fora) and financial support were effectively established and coordinated in each of the regions under evaluation.

The coordination of EU support to the CS is all the more necessary that it is, by law, fragmented into a compilation of instruments and modalities of engagement from different EU directorates and services. Silo management has long been the norm. It still prevails in the EU / CS regional dialogue mechanisms, structured by instrument / theme.

Co-ordination has been facilitated by the fact that all the instruments endowed with their own specificity, have had their policy aligning, giving the possibility to the EUDs to use them according to their complementarity. CS mainstreaming and the development of comprehensive support programmes have given more room to the EUDs to engage in different and converging initiatives with the CS.

It also relied on active coordination between the Desks, CoTE and DEVCO in Brussels and the cooperation sections of the EUD, at least at the programming stage.

In most countries, there is a strong coordination between the political and cooperation sections regards human rights, and the EIDHR.

Indicator 6.1a	Effective coordination among relevant EU DGs, EEAS, EUDs etc. was established over the question of EU engagement with civil society
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In 2017, the ENI mid-term review report³⁰⁹ evaluated positively the internal coherence of ENI programmes and the overall coherence between the European Financial Instruments (EFIs). The report indicates that coherence is found mainly in the policy framework of the regulation (e.g. strategic objective) rather than in operational linkages or synergies. "The EU institutions have a number of inter-service consultation and coordination mechanisms (with related templates and reporting lines), supported by consistent instructions in the ENI Regulation that ensure the coordination of specific objectives different EFIs and coherence of projects between geographical and thematic instruments. Their degree of success varies, but in general, there is no inconsistency between programmes".

There is also a great complementarity between the EFIs. The EIDHR and the CSO-LA were clearly intended, by design, to complement the geographical instruments (ENI). Each instrument has specific features and is used accordingly: The EIDHR complements and adds value to the CSO-LA by allowing funds to go to the activities of CSOs (and individuals) even when the government does not approve.

In the allocation of funds, there is also a trend towards the "division of labour" between CSO-LA and EIDHR. The latter is investing more in its human rights and elections components, while support for democracy through the participation of civil society is increasingly devolving to CSO-LA.

In the context of an unstable and increasingly tense Neighbourhood, stabilisation objectives can be found in the geographic Instrument and in related thematic Instruments. Crisis prevention is indicated as an ENI objective and particularly present in the IcSP regulation. The EIDHR is considered generally "as better able to

³⁰⁹ Evaluation of the European Neighbourhood Instrument, Mid-term review report of the External Financing Instruments, 2017

respond and provide support than other EFIs” on that topic (ENI evaluation report). But, “dedicated crisis prevention appears to be marginalised in the context of the Neighbourhood: the resources available to the IcSP are not proportional to the on-going tensions and on-coming crises”.

In theory, the separation is clear between thematic and geographic instruments, even when several instruments can be used on common topics (democracy, stabilisation). In practice the responsibility falls on EUDs to ensure that overlaps do not occur. The ENI evaluation report argues that “although it obviously differs from one Delegation to the next, capacity constraints and work pressure can lead to a lack of coordination. However, while recognising that some overlap can occur, particularly between projects under the CSO-LA and the EIDHR, DEVCO point out that this rarely happens in practice”.

Coordination between political section of the EUDs and the HR focal point dealing with EIDHR portfolio is effective in most EUDs in the region and lack of coordination, when occurring, is individual-related.

In 2017, the European Commission-requested report³¹⁰ on coherence argues that there is rather a “co-existence of good practices and silo approaches”. On one hand, some EUDs engage with proactive and strategic search for synergies between the EU financial instruments, seeking to make the most of the mix of instruments. On the other hand, there are tendencies to deal with instruments in an “instrumental manner” (as a self-standing tool), reinforcing the silo approach.

This problem was also noted in documentation, and raised by EU representatives, with regard to the management of regional programs. Nevertheless, the designation of focal points for this type of programme has clearly improved the information sharing, and the coordination needed for the regional and bilateral instruments' management. In Morocco, we found for instance that the development of the EU youth strategy was based on coordination with the NETMED Youth programme team in this country.

At regional policy level, it is interesting to note that the existing forums correspond to each of the EU's financial policies and instruments whose regulation stipulates that the EU must engage in a structured dialogue with the CS:

- EEAS: the SCDN (global coverage) on Peace and Stability, the EU-NGO forum on Human Rights and Democracy (global coverage) with EIDHR
- DEVCO: the Policy Forum on Development (global coverage) with DCI/CSO-LA
- DG NEAR: the CS Forum South in link with ENP (regional coverage)

This structuring by instrument favours silo effects. But for each of them, the links with EU policy work are established, as the organisations in charge of coordinating these fora rely on the EU agenda, highlighting that mobilising EU staff is very difficult and that the effectiveness of these spaces is more guaranteed when it meets the needs of the EU.

Judgement Criterion 6.2: The combined efforts of the EU and EU Member States and other donors have led to a coherent and complementary response to the needs of civil society.

The EU's coordination efforts with the MSs in support of civil society have been continuous and have made a quantum leap with the introduction of the CS roadmap mechanism. Nevertheless, the level of coordination varies from country to country, and fluctuates with the weight of bilateral MS interests with partner countries and

³¹⁰ Coherence Report – Insights from the External Evaluation of the External Financing Instruments, Evaluation Unit of the Directorate-General for International Co-operation and Development, 2017

their historical and political relationships. In these contexts, the CS roadmaps have been a laborious process, giving birth to sometimes general and vague documents. The weakness of the roadmap is that it is not about programming document, so that no reporting is done on the priorities identified.

In terms of coordination between the EU and the MSs, Palestine is the country where the level is the highest: the second roadmap for the next 5 years has been developed (the only one at the time of the evaluation) and is aligned with the joint strategy. Palestine is the only country where there has been a joint programming between the EUD and the MSs, in which support to CSOs is clearly mainstreamed.

In all countries there are donor working groups, sometimes directly coordinated by the EU (Egypt, Tunisia). None of these groups is dedicated solely to civil society, but new projects and future perspectives with CSOs are on the agenda of the meetings

Indicator 6.2a

Effective coordination between the EU and EU Member States and other donors was achieved.

It is important to recall in advance that the issues surrounding donor coordination to increase aid effectiveness are old and that thematic coordination mechanisms are established in all the countries of the region. These mechanisms have the minimal function of exchanging information. The level of coordination is much greater when it is part of joint actions, as is the case, for example, for support budgets in Morocco (see evaluation) but whose link with the CS is very weak.

Roadmaps aim to improve the impact, predictability and visibility of EU actions, ensuring consistency and synergy throughout the various sectors covered by EU external relations. They are also intended to foster coordination and sharing of best practice with Member States and other international actors.

The “roadmap taking stock study” and the analysis of CS roadmaps in the region show evidence that their elaboration process in 2014 contributed to enhancing “dialogue, mutual knowledge and even stronger cooperation”. In Lebanon and Palestine, EU MS were actively involved through specific coordinating mechanisms (Task Force, Roadmap Group) led by the EUDs. At implementation level, Member States involvement varies from country to country. In Palestine, references to Member States are well introduced in the Roadmap under the four priorities and in relation to the proposed actions. In countries such as Morocco and Tunisia, MS financial mechanisms have been identified to support the implementation of the Roadmap. The “tacking stock” report also highlights that “the enhancement of the political section of the Delegations has improved analytical and reporting capacity, which has an impact both on relations with the member states’ embassies and on ‘upstream’ contribution to EEAS country analysis in Brussels.”

In 2014/2015, the CS roadmaps present the way in which coordination takes place between the MSs and the other donors, without, however, giving any temporal indications on the historical depth of this coordination. All the roadmaps analysed present a positive image through different thematic coordination groups.

In countries with close civic space, the Human Rights Working Group is reported (Jordan, Egypt CS Roadmaps) to be the most important coordination modality that gathers MS and donors, as it can make recommendations to leverage EU political dialogue through the EU-Country Subcommittee on Human Rights, Governance and Democracy, in charge of assessing progress made regarding democratic reforms, with the possibility to trigger the incentive based mechanism of the umbrella fund (see EQ Impact).

In all countries there are donor working groups³¹¹, sometimes directly coordinated by the EU (Egypt, Tunisia). None of these groups is dedicated solely to civil society, but new projects and future perspectives with CSOs are on the agenda of the meetings,

³¹¹ Donors Assistance Group (Jordan) ; Development Partners Group and sub-groups (Egypt) ; Governance Group, HR Defenders Group, Sectoral Group (“Development and Social Protection”, “Education”, “Environment, agriculture and natural resources) in Morocco; Working Group on Aid Effectiveness (Algeria)

Since 2015, and following ENI revision, the EU is moving towards more joint programming in the Neighbourhood, which is considered as an effective tool to enhance EU coordination at country and sector level and identify and develop common priorities³¹². It reinforces coordinated policy dialogue, as well as joint analysis, information sharing, joint implementation initiatives, joint monitoring and joint evaluation.

Palestine is the most advanced example in this process with a joint programming document resulting from discussions among European development partners, Palestinian ministries, civil society organisations, the business community, the United Nations and many other key actors.

In Morocco, a joint analysis of the socio-economic challenges facing the country has been approved by EU Delegation and Member States embassies.

In Egypt, EU Delegation and Member States through European development agencies (GIS, AFD) carry out joint initiatives in the social sector through “delegated cooperation schemes”³¹³

In Tunisia, a joint action was developed and supported the formation of the platform Jamaity.org which now lists more than 1400 associations and 120 PTF³¹⁴

In 2017, the ENI mid-term evaluation report³¹⁵ indicates that coordination with EU Member States has been strengthened in recent years, as evidenced by the growing number of joint programming exercises conducted. However, “complementarity remains largely limited to specific areas of cooperation and with limited results”, due to the “reluctance” of Member States to advance complementarity and synergies of programmes. On the other side, the coordinating role of the Delegations regarding human rights and civil society issues is singled out as “the most important change leading to more synergies with the member states”³¹⁶. Member States contribute to drafting the Human Rights Country Strategies, which further “ensures their commitment to the jointly agreed priorities. [...] It also gives greater weight, relevance and visibility to the human rights diplomacy carried out by the Delegations, even if suspicions of the motivations of some member states remain.

In 2018, the study of the European Parliamentary Research Service³¹⁷ argues that the divergence between EU Member States remains a challenge: “despite progress and formal commitments in some countries, in most cases EU Member States have not introduced major changes to readjust the focus of their diplomacy and cooperation on their national interests’. Thus, coordination challenges remain in Algeria, Jordan, and Morocco”.

Judgement Criterion 6.3: Synergies were achieved, and duplication of efforts of the EU, EU MS and other donors was avoided in each of the regions under evaluation.

Synergies at the political level between the EU and the Member States are all the more important in the case of a joint programming context as in Palestine. At the implementation level, synergies are not always identified or exploited. Several cases illustrate this:

In Morocco, Spanish cooperation along with USAID, have been important players in the field of participatory democracy and local governance in Morocco. Lessons learned from this long experience could have been shared during the development of the Moucharaka programme. The last USAID’s implementing partner for the last CS programme, has been consulted by the TA in charge of the Facility Program, and one of the Spanish NGOs has benefited from a grant under the Moucharaka program. Nevertheless, no coordination between EUDs and AECID or USAID could be noted.

³¹² European Parliamentary Research Service (EPRD), 2018. The EU external financing instruments and the post-2020 architecture European Implementation Assessment Study

³¹³ CS Roadmap

³¹⁴ CS Roadmap

³¹⁵ Evaluation of the European Neighbourhood Instrument, Mid-term review report of the External Financing Instruments, 2017

³¹⁶ DG External Policies, the role of EU delegations in EU human rights policy, 2013

³¹⁷ European Parliamentary Research Service (EPRD), 2018. The EU external financing instruments and the post-2020 architecture European Implementation Assessment Study

At a regional level, relations between the EU and French cooperation, and certain specific programmes that the later supports, illustrate to what extent synergies are exploited or not. French cooperation, whose portfolio of support to civil society goes to AFD, developed in the 2000s a specific programme of support for civil society, called the Multi-Actors Concerted Programmes (PCPA). These programmes adopt the participatory approach in development, through objectives of strengthening CS capacities as actors of development and democratic governance. The specificity of these programmes is to be part of processes of change and run on average over a period of 10 years. They put in place a sub-granting mechanism to reach as many organisations as possible in the territories. The PCPAs are based on a particular institutional setting, bringing together French NGOs and their local CS partners, as well as local authorities and public authorities (particularly sectoral ones) from France and the partner country.

- Synergies have been exploited in Algeria through co-financing of the PCPA programme by the EU on several occasions. The EUD was able to rely on the sub-granting mechanism put in place in the programme to channel its funding as well. In 2018, the EUD launched, with the Algerian authorities, its own support programme integrated with civil society, on the theme of participative democracy and local development (but the civic and popular protest movement arrived in 2019).
- In Tunisia, the PCPA was launched in parallel with the launch of the PASC. No synergy was exploited while the EU PASC did not have a sub-granting mechanism. The programs could appear complementary in that they were not located in the same region. The PCPA enters its third phase while the development of a second programme of support to the CS is still ongoing.
- In Morocco, the PCPA ran from 2002 to 2014 and was a forerunner (as USAID through SANAD programme and the Local Governance Programme) in support of CS in the framework of participatory democracy and local development, especially among young people. It is interesting to see how these programs have tested the youth councils at the municipal level, mechanisms that have been instituted (at the regional level) by the different legislative texts that have succeeded each other since 2012, and on which the Moucharaka programme of the EU will be able to rely.

Indicator 6.3a	Extent to which synergies were identified and exploited, overlaps were avoided at the policy level
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The evaluators did not develop significant findings for this Indicator.

Indicator 6.3b	Extent to which synergies were identified and exploited, overlaps were avoided at the implementation level.
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The evaluators did not develop significant findings for this Indicator.

EQ7 (EU added value): To what extent have the various forms of EU's engagement with civil society in the Neighbourhood South over the evaluation period had characteristics which distinguished it from that of other actors?

Judgement Criterion 7.1: EU support to civil society in these regions has had a distinctive feature in comparison with that provided by other actors, based on its comprehensive and multi-faceted approach.

The combination of the three forms of EU engagement with civil society is not a distinctive feature in itself. What distinguishes the EU from other donors is that (i) these forms are governed at a political level, (ii) their application tend to be systematic and extended to all sectors of cooperation, while other donors can apply these three forms of engagement, but on an ad hoc basis or on specific topics.

In its implementation, we have noticed a difference depending on the political and institutional setting of the countries, notably regarding the civic space granted for CS. In countries with restricted space, the deployment of mainstreamed supports to CSOs as well as the policy level engagement (facilitation of policy dialogue between the CS and the State) is much more limited than in transitioning countries to democracy. In countries with a more open civic space, the combination of forms of engagement with civil society can be applied and does not seem to be a distinctive feature of the EU's support.

It has been observed, however, that the MSs, engaged with the government as well as with the CS through technical and financial supports, strive to mainstream the CS in the different sectors / priorities of cooperation, and to engage in a political dialogue when human rights are of a priority in the MS's cooperation policy. Dissemination of EU concepts and approaches was disseminated as part of the roadmap process. Many MS join the EU in the support budget (Morocco) or in joint programming (Palestine).

The distinction between the EU and the Member States in support of civil society lies in the financial and implementation modalities. The direct award practice is appreciated by all surveyed and interviewed CSOs, and by EUDs employees who have experienced this type of modality, in crisis situations such as in Palestine or in the case of operating grants in Palestine and Morocco. This modality makes it possible to engage more in partnership relations with the CSOs by co-constructing the interventions. For the CSOs, it mainly ensures financial stability that offsets the instability resulting from the CfP.

EU action grants directly allocated to CSOs as main applicant is the result of a long process of capacity development and the contributions over time of INGOs, foundations or directly by the Member States, engaged in a more partnership-type relation with the CSOs. So, it can be said that the supports of these actors have contributed to lever their partners' capacities to access to EU funding, especially that the EU has remained the main player providing financial support to CSOs (all countries combined).

Finally, from 2012, the EU has distinguished itself by developing a support programme integrated with civil society. It should be recalled that similar support had been provided by some members (France, Spain) and other countries (USAID) over previous periods, and especially during the pivotal period between 2009 and 2012. The programs developed by the EU gave mixed results and were in 2012 and 2018 (depending on the country) in a phase that can be qualified as of experimentation. These programs, with their reinforced design, remain relevant and should bear fruit.

Indicator 7.1a

The combination of forms of engagement with civil society has been a distinctive feature of the EU's support.

We have already mentioned that the categorisation of EU engagement forms in targeted support, mainstreamed support, and policy-level support could be confusing. We prefer to distinguish financial and non-financial support to CSOs, whether CS is a separate sector (democracy and civic participation) or mainstreamed in other sectors (service delivery and policy dialogue).

The combination of the three forms of engagement with civil society is a distinctive feature of the EU's strategy and objectives in support of civil society. Nevertheless, in its implementation, we have already noticed a difference depending on the political and institutional setting of the countries, notably regarding the civic space granted for

CS. In countries with restricted space, the deployment of mainstreamed supports to CSOs as well as the policy level engagement (facilitation of policy dialogue between the CS and the State) is much more limited than in transitioning countries to democracy. In countries with a more open civic space, the combination of forms of engagement with civil society can be applied and does not seem to be a distinctive feature of the EU's support.

CS Roadmaps show that some Member States also provide mainstreamed support and policy-level engagement with the CS, in addition to targeted and financial support.

In Morocco, some Member States have established a dialogue with CSOs with the collaboration of their national development actors (Belgium, Italy, and Germany). Others have established a direct dialogue with CSOs working in their priority areas of intervention (Denmark). Some Member States seek to strengthen institutional dialogue in relation to the challenges of civil society. Spain and the United Kingdom stand out in this sense, insofar as it seeks to mainstream the CS. UK aims to include in bilateral cooperation programmes with different sectoral ministries a collaboration component with civil society, whereas Spain seek to strengthening public institutions for the establishment of a support system for civil society, in a framework of dialogue with it, to ensure the sustainability of the services provided, and to promote partnership relations.

In Jordan and Egypt, CS Roadmap highlights that “most of the Member States present are active in the field of civil society, be it for operational matters, when they have specific allocations for CSOs, or at the policy level when they do not financially support CSOs, but are active in strengthening dialogue with them.”

In Palestine, most EU Member States, along with Norway and Switzerland, have established dialogue mechanisms with Palestinian civil society in order to strengthen the political dialogue between the EU and the Palestinian Authority, and to increase the involvement of the CS in sectoral policies.

As far as the US is concerned, democratisation policies through support for civil society are old and date back to the 1990s in general³¹⁸, and in the region in particular³¹⁹. Their implementation through targeted support goes through subcontractor agencies with USAID but also through the actions of political foundations (as for Germany). USAID also practices mainstreamed support by seeking to systematically integrate support for civil society into sectoral policies, as illustrated by USAID's engagement to Morocco in the education sector³²⁰. The building of a partnership relationship with the CS, to engage in a multifaceted dialogue, has been a constant goal, reaffirmed by Obama's speech in Cairo in 2009, especially in Morocco and Jordan. The election of Donald Trump as president seems to have stalled this policy. This is particularly visible in Palestine as the US stopped all aid to Palestinians in the occupied West Bank and Gaza, in a step linked to new anti-terrorism legislation, The Anti-Terrorism Clarification Act (ATCA).

Indicator 7.1b

The combination of thematic and regional instruments has been a distinctive feature of the EU's support.

Neither documents nor field visits provide evidence that another donor or actor has taken such an approach.

Indicator 7.1c

The combination of modalities and modes of engagement has been a distinctive feature of the EU's support.

Concerning grant access for CSOs, the EU distinguishes itself by the systematic adoption of the project approach and a grant competitive procedure for CSOs (international and national) through the CfP, while many Member States carry out core funding in the care of a more long-term partnership with support for the

³¹⁸ Carothers, T. 1999. "Aiding democracy abroad, the learning curve", Carnegie endowment for international peace.

Carothers, T. Ottaway, M. 2000. "Funding Virtue: Civil Society Aid and Democracy Promotion", Carnegie Endowment for International Peace

Carothers, T. 2002. "The end of the transition paradigm", Journal of Democracy, 2002, Vol.13, n°1, pp. 5-21

³¹⁹ Denoeux, G. 2005. "Promoting Democracy and Governance in Arab Countries: Strategic Choices for Donors." NGOs and Governance in the Arab World. Ed. Sarah Ben Nefissa, Nabil Abd al-Fattah, Sari Hanafi, and Carlos Milani. Cairo: American University in Cairo Press, p.79

³²⁰ USAID in Morocco, website

organisations as such. In countries with strong CSOs, direct award grants have budgets comparable to those awarded by the EU. This is particularly the case in Palestine, where the majority of the EU partners CSOs met during the field visit, are also partners of the MS.

In partner countries where CS is weaker, financial and technical support is provided through NGOs of the MS country. Among these are different funding modalities, including MS that practice framework partnership on a multi-year programmes basis, or those who practice project co-financing.

The Danish cooperation (Danida) stands out with the Danish-Arab Partnership Programme (DAPP), which is a five year phase programme operating since 2003, based on partnerships between Danish and local organisations, centred on six development engagements including Human Rights, Gender Equality, Free Media, Labour Market and Social Dialogue, Youth Participation and Employment and Entrepreneurship and Access to Finance. The DAPP purpose is to lay the foundation for “democratisation, stability and prosperity in the Middle East and North Africa”, with a special focus on Jordan, Egypt, Tunisia and Morocco.

Project co-financing is a feature of France cooperation policy towards support to CS. This partly explains why operational synergies are important with the EU in the case of projects implemented by French NGOs, co-financed by AFD and the EU. In countries, embassies also have a financial envelope for small grants at local CSOs.

Other Member States, such as Germany, are distinguished by the commitment of political foundations, some like the Friedrich Ebert Stiftung with a youth agenda, women and democratisation, having played a role in the formation of new generations of activists, including those who participated in the protest movements (Case of Morocco).

EQ 8 (EU added value): To what extent could changes, which the EU contributed to, have happened in its absence?

Judgement Criterion 8.1: EU support has been an essential factor in contributing to significant change in the sphere of civil society development in each of the regions.

The EU is the main actor of CS support in all the countries of the region and as such plays a leadership role in many aspects of coordination.

- The EU's contribution to the democratic transition in Tunisia is widely recognised by all stakeholders interviewed.
- In Morocco, other actors such as AFD and USAID have been more precursors with programmes like the PCPA, SANAD and the PGL, centred on democratisation and local governance objectives by supporting civil society before 2011. The EU has subsequently been able to redeploy its interventions on these themes.
- In Palestine, the recent withdrawal of USAID, but also of the FORD Foundation - a key player for the human rights movement - places the EU, and other MS, in a "monopoly" position in the human rights field, which has long been the case in Israel.

Indicator 8.1a	EU support has responded to an extent or in ways not provided by other donors.
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The evaluators did not develop significant findings for this Indicator.

Indicator 8.1b	The EU has been able to leverage institutional and financial resources not available to other donors.
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The evaluators did not develop significant findings for this Indicator.

3. Neighbourhood East

EQ1 (Relevance): To what extent have the EU's objectives and approaches to its engagement (policy dialogue and financial support) with Civil Society properly addressed the variety of problems faced by / needs of civil society actors in the Neighbourhood East region over the evaluation period?

Judgement Criterion 1.1: The EU's objectives with regard to its support to civil society have evolved effectively in line with the needs of civil society actors over this period in the Neighbourhood East region.

Indicator 1.1a	Stakeholders confirm the relevance of EU objectives relating to its engagement with civil society over the period under evaluation.
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Stakeholders across most categories (including civil society organisations, wider civil society, public bodies and international organisations, both in EaP and in the EU) confirm the relevance of general EU objectives relating to its engagement with civil society in the Neighbourhood East region in the period under evaluation (2007-2018) across all units and levels of analysis.

According to the survey findings, the most positive assessment is seen in the case of Armenia, where EU support (particularly since 2012) is attributed with having mapped closely against the needs of civil society. Out of 24 survey CSO respondents from Armenia, 21 voiced positive or very positive feedback on the relevance of EU objectives and their evolution over time (SQ5). Half of field mission interviewees in Armenia (9 out of 18) including EU staff, CSOs and public institutions, provided a positive assessment of the relevance of EU objectives with no negative comments received across the whole group of 18.

In the cases of Georgia, Moldova and Ukraine the responses to the survey indicate a generally positive assessment mixed with certain reservations (discussed elsewhere).

Out of 8 CSO responses from Georgia (SQ5), 5 present a positive assessment of relevance and three provide mixed and neutral comments.

Out of 16 CSO responses from Moldova, 10 respondents assessed the relevance of EU objectives positively, 4 had mixed/neutral comments and one provided a negative assessment. In case of Ukraine, 13 out of 25 CSO respondents provide a positive assessment of relevance, 6 provide mixed/neutral comments and 6 evaluate relevance of EU objectives negatively.

During the field mission in Ukraine, 20 out of 35 interviewees representing EU institutions, public bodies and CSOs were positive about the relevance of EU objectives in the country, and only 1 interviewee was critical of it.

In the case of Azerbaijan, while respondents note the relevance of the EU approach in principle, they also point out that this approach cannot be implemented under current conditions in the country – out of 17 CSO respondents, 10 point to the limiting character of national policy and legislation limiting the freedom of CSOs (SQ5).

The perceptions of respondents in the Belarusian case draw attention to the dilemma faced by the EU in the context of a country in which civil society faces considerable constraints, which impact on the relevance of the EU's attempts to introduce a diversification of engagement with a broad range of civil society actors. Out of 17 Belarusian CSO survey respondents, 9 voiced primarily negative comments on the relevance of EU objectives, 6 assessed it positively and 2 provided mixed and neutral comments (SQ5). Among 20 Belarusian field mission interviewees, all 13 respondents representing CSOs, EU staff and public institutions contended that EU's objectives are relevant, voicing reservations regarding their efficiency and impact. Some civil society organisations, especially in countries with restricted spaces for civil society, voiced their reservations about the EU's objectives as irrelevant mostly due to their limited efficiency and impact. As one EUD interviewee in Belarus put it, 'EU objectives are always limited by what the Government of Belarus wants, if Government of Belarus is opposed, objectives can be meaningless'. Belarusian respondents to the civil

society survey also raised concerns over what they consider to be the negative (unintended) outcomes of EU support to Belarus as a whole, which (in their view) amounts to support of an authoritarian regime that does not respect civic and human rights (SQ5).

Some government stakeholders, notably in countries with restricted spaces for civil society, voice their reservations as to the relevance of EU objectives in civil society engagement. One project report from the targeted sample notes that in an intervention in Azerbaijan, government stakeholders opposed to the use of the term 'civil society' and suggested using the term 'social service provider' as more neutral instead (AS-G).

Across all stakeholder categories, the three most commonly referenced EU objectives for EU engagement with civil society in the Neighbourhood East are those identified in the 2012 'Roots of Democracy' document, notably: 1) enhancing efforts to promote a conducive environment for CSOs in partner countries, 2) promoting a meaningful and structured participation of CSOs in domestic policies of partner countries, in the EU programming cycle and in international processes as well as 3) increasing local CSOs' capacity to perform their roles as independent development actors more effectively. Out of over 100 CSO survey respondents from the region, over 80 listed one or several of the three objectives as features of EU engagement with civil society in EaP (SQ5, SQ6, SQ7).

Most interviewees confirmed the relevance of these objectives to the targeted support, mainstream engagement with civil society and policy-level engagement with which they were familiar.

EU recognition of the role of CSOs as actors in development has influenced the mixture and relative importance of development and transitional priorities that are addressed. For example, one recent study suggested that the relatively high attention to child protection issues in the countries covered by this evaluation, compared to other countries at a similar level of development "may reflect a higher political priority allocated to children's rights issues in the relationship between the EU and these countries." These issues are all common commitments in partnership agreements and GSP+ agreements.³²¹

Individual level civil society actors and individual beneficiaries voice overwhelmingly positive opinions about the relevance of EU objectives.

One CSO interviewee in Armenia stated that the EU had in earlier years been "much more passive in its objectives for CS in Armenia but is now more interested at all levels from objectives through approaches to operations."

One CSO interviewee in Ukraine contended that 'EU's relevance to CS needs has been quite good during 2007-2018. "Only thanks to it civil society actually managed to develop. Of course, EU's political influence and support at higher level is critical. It is visible how the authorities show much more respect towards projects which are funded by the EU."

Indicator 1.1b

The rationale for the evolution of EU objectives is presented in key policy and programmatic documentation.

The rationale for the evolution of EU's objectives with regard to its support to civil society in the Neighbourhood East is clearly and coherently presented in key policy and programmatic documents, including global, regional, thematic and country-level documents.

The fundamental objectives of EU engagement with civil society remained unchanged and are underpinned by general principles and objectives of the EU's foreign policy and international development including promoting peaceful and inclusive societies, promoting sustainable development, and eradicating poverty.

The evolution of policy documents and reflection of objectives is a constant process and, as such, precedes and influences this evaluation. For example, the thematic programme 'Non-state Actors and Local Authorities in Development' recognised as early as 2006 that civil society organisations are key actors of aid delivery and important players associated with the policy-making process and that they allow civil society to exercise its own right of initiative, to develop innovative approaches and to bring a specific dynamic to the process (The Thematic Programme "Non-state Actors and Local Authorities in Development" COM (2006)19 final). The consistency of

³²¹ Armenia is the only IPA and ENI country benefiting from GSP+.

the evolution of EU's objectives in civil society engagement is confirmed by evaluation results. For the above-mentioned example, the evaluation states that 'The programme's approach to multi-country projects has evolved considerably during the implementation of this programme' and that the programme evolved well in line with the changing policy priorities (Final evaluation of the Programme 'Non-State Actors and Local Authorities', 2013).

A substantial change in global objectives for engagement with civil society occurred in 2011, when the ENP 2011 review proposed the 'more for more' principle, whereby additional reform efforts by partner countries were to be rewarded with additional financial and other support and the EU prioritised civil society support across its neighbourhood by proposing to: 1) establish partnerships in each neighbouring country and make EU support more accessible to civil society organisations through a dedicated Civil Society Facility; 2) Support the establishment of a European Endowment for Democracy to help political parties, non-registered NGOs and trade unions and other social partners; 3) Promote media freedom by supporting civil society organisations' (CSOs) unhindered access to the internet and the use of electronic communications technologies; and 4) Reinforce human rights dialogues (A new response to a changing neighbourhood, COM (2011) 303 final).

The EU further reaffirmed its global support for civil society in 2012 with a focus on three areas: 1) enhancing efforts to promote a conducive environment for CSOs in partner countries; 2) promoting a meaningful and structured participation of CSOs in domestic policies of partner countries, in the EU programming cycle and in international processes; and 3) increasing local CSOs' capacity to perform their roles as independent development actors more effectively (The roots of democracy and sustainable development: Europe's engagement with Civil Society in external relations' strategic document' (2012)).

The 2015 ENP Review further reinforced the principle of flexibility in order to accelerate assistance and to ensure it is better adapted to rapidly evolving political circumstances and priorities. The review also postulated to: 1) further expand the EU's outreach to CS in its broadest sense, including to social partners; 2) increase support to the EED; 3) further support Civil Society fora with a view to more structured dialogue (Review of the European Neighbourhood Policy, JOIN (2015) 50 final).

The EU's evolving objectives in the East were confirmed by the emergence of the Neighbourhood East initiative. Announced in 2008 and launched in 2009, the Partnership postulates stronger participation of civil society to enhance oversight of public services and strengthen public confidence in them. Although complimentary to ENP, the EaP has its own institutional set-up and programming. Most recently, the EaP moved towards tangible deliverables in the run-up to 2020, with a focus on 'a vibrant civil society sector [as] crucial for private sector development, sustainable economic growth, ambitious environmental policies and social innovation. High-quality sector reform dialogue can only be achieved through increased technical expertise and stronger leadership of civil society organisations (CSOs)' (Neighbourhood East - 20 Deliverables for 2020).

Programmatic documentation at global and thematic level closely followed policy evolution and documentation. The key instruments for EU engagement with civil society in the Neighbourhood East since 2014 were the European Neighbourhood Instrument (ENI), the European Instrument for Democracy and Human Rights (EIDHR), the Partnership Instrument, the Development Cooperation Instrument (DCI) and the Instrument contributing to Stability and Peace (IcSP or ISP).

The 2017 mid-term review of External Financial Instruments states that the instruments evolved in line with policy priorities and that 'the broad nature of the instruments' objectives covers partner country needs and global and EU priorities, and have partially enabled the EU to respond to new crises and evolving needs' (Report from the Commission to the European Parliament and the Council: Mid-term Review Report of the External Financing Instruments, COM (2017) 720 final).

As noted in the mid-term review, EIDHR was designed as a flexible and responsive instrument and, as such, was able to respond most promptly to changes in objectives. The ENI strengthened the principle of differentiation and the focus on country ownership and civil society (compared with its predecessor, the ENPI) and the other programmes, such as DCI/CSO-LA, closely followed evolving objectives, for example in response to the political changes in Ukraine (see EQ2 and 3) and Armenia.

Programmatic documentation at country level also closely reflected objectives and their evolution. The country Roadmaps for engagement with civil society, first conceived in 2014 as an instrument of strengthening EU engagement with civil society around the world, including in the Neighbourhood East, explain the rationale behind policy evolution and in themselves evolve with changing objectives. The 2014-2017 Roadmap for Georgia closely mirrors 'Roots of democracy' (2012) as its priorities include: improvement of the enabling framework, support to involvement in policy dialogue and capacity development. The reviewed 2018-2020 Roadmap has a broader remit, more closely aligned with EU-Georgia bilateral relations, reflecting the policy changes in the relationship including the signing of AA/DCFTA.

There is a difference in how the evolution of objectives is reflected in policy and programmatic documents between countries with a clear and legally binding relationship with the EU (AA/DCFTA and CEPA), and those with other or no arrangement (Azerbaijan and Belarus). In this case, the EU's use of multilateral platforms such as the Neighbourhood East and EaP Civil Society Forum (see 1.1c) helps to bridge policy gaps at bilateral level. In the absence of formal agreements and inter-governmental platforms between the EU and Azerbaijan/Belarus, civil society acts as a conduit for social, cultural and economic dialogue, and partnerships between CSOs in the EU and EaP countries reinforce bilateral relations at many levels including people-to-people contacts, cultural exchange and social dialogue, amongst others.

Indicator 1.1c

Consultations with civil society actors and organisations were used to inform the evolution of EU objectives.

Consultations with civil society actors and organisations in the Neighbourhood East were increasingly used over the period 2007-18 to inform the evolution of EU objectives at multiple levels from global through regional to national, and have come to be used on a systematic and regular basis, thereby facilitating a valuable feedback loop for civil society and the EU to engage in dialogue.

At the policy and strategy level, consultations with civil society were part of EU objectives for engagement with civil society throughout the entire period of the evaluation, as evidenced by the 2007 communication 'A Strong European Neighbourhood Policy': 'Civil society organisations have a valuable role to play in identifying priorities for action and in promoting and monitoring the implementation of ENP Action Plans', amongst other key policy and programming documents (see 1.1b).

At the regional (Neighbourhood East) level, the EU has been paying increasing attention to civil society actors and organisations and their inputs have informed the evolution of EU objectives. The establishment of the Neighbourhood East and the EaP Civil Society Forum in 2008 was a significant step towards more structured and regular dialogue with civil society in the region. After a decade of operations and with over 500 CSO members across all six countries of the region, the EaP CSF provides regular inputs into EU consultations. EaP CSF members interviewed at the 2018 Annual Assembly in Tbilisi confirmed that EU frequently consults the Forum on its objectives and that the Forum's views inform EU objectives in civil society engagement in the region.

The initial rationale behind EaP CSF was to create a civil society platform that would contribute to the objectives of the Neighbourhood East through an extremely wide portfolio of measures. These include: providing a civil society perspective to complement the governmental track of the EaP; regular provision of recommendations, including input in the work of ministerial meetings and multilateral platforms; promoting dialogue between CSOs, networking and exchange of experience and good practice with other groupings (EESC, social partners, NGOs, think tanks, among others); working on the issues of common interest linked to the goals of ENP in general and EaP in particular; sharing experience in the European integration processes in EaP countries; discussing what civil society can do to promote the multilateral component of the EaP, including confidence building measures in the regional conflicts; building capacity of civil society organisations in the countries of the EaP through the contacts with CSOs from EU Member States and international organisations/networks; and providing an open channel for permanent inclusion of civil society expertise and views in the EaP process.

Furthermore, the EaP CSF was designed to facilitate relations with the EU institutions and contribute to the strengthening of national civil societies and CSO dialogues with authorities in the EaP partner countries, and the strengthening of the institutional capacity building role of CSOs, especially in those sectors where they have valuable know-how and can contribute to achieving the goals of the EaP, also at a national level. This broad mandate supports the EU's strategic commitment to civil society through all possible means and forms of engagement beyond targeted support but also covering policy engagement and mainstreaming.

The EU provided funding for setting up and continued operation of the Forum, covering 90% of the EaP CSF costs until 2017 (1 million EUR per year). The Forum has been relatively successful in rolling out membership across the whole region through its National Platform, with an NP in each EaP country. **The most important internal achievements of the Forum** are that the CSF has become the largest CSO platform in the EaP, has increased socialisation, and contributed to a high degree of internalisation of European norms and values, organically creating a highly sophisticated and functional institutional architecture with a fully staffed secretariat, national platforms, working groups and annual meetings. **The most important external achievements** are a successful membership drive (over 500 member organisations as of 2018), recognition as a significant actor in all EaP member states and civil society communities, and generation of significant research outputs related to civil society reality, including policy-engagement, enabling environment and human rights. (Interview with EaP CSF Secretariat staff at inception phase).

A 2014 EaP CSF evaluation report notes that the Forum mirrors the major weakness of wider civil society through its 'detachment from the broader populace in the EaP countries. Every activity within the framework of the Forum should include the component of (re)connecting the CSOs with the society at large' (CEPS Special Report 2014). This is confirmed by interviews in the field, including with EaP CSF member organisations who readily admit that the Forum is not representative of the whole sector and further work is required in outreach to constituents and communities (a key challenge for most CSOs in the region). Furthermore, the 2014 report highlighted that 'CSF has struggled to engage CSOs from the EU. There have been concerns that the European stakeholders might lose interest in joining the Forum and that the CSF might run the risk of becoming solely the Forum of the Eastern partners, breaking its link to European Union civil society'.

Although the National Platforms have mixed reviews among civil society actors, **the Forum remains the largest regional forum and the EU's continued support means that the Forum is likely to remain the main consultation platform beyond 2018**. Since 2018, the EU increased its funding for the Forum both in percentage (95%) and absolute terms (1.5 million per year in 2018-2020). A renewed and streamlined EaP CSF grant provides support for the organisation of Annual Assemblies, EaP National Platforms, projects initiated by Forum members on EaP relevant topics, increasing technical capacities of CSOs working on relevant governance sectors (as per EaP Riga Summit Conclusions), an Early Warning and Resilience Mechanism to enable fast reaction of thematic working groups of the Forum to elaborate joint positions/reactions/recommendations, a new organisation development strategy, a revised advocacy and communication strategy for the Forum, the elaboration of the Neighbourhood East Integration Index and funding prizes for civil society advocates for their record in advocacy and monitoring work in the EaP region (CoTE EaP CSF Brief, 2018).

There is, however, an ongoing tension within and around the EaP CSF as an entirely EU-funded civil society body, as certain interests and requirements of the EU as a funded and consultation partner are difficult to reconcile with the independence of the civil society sector. One representative of EaP CSF management claimed suggested that the EU first created the Forum with the right intentions but now wants to be in control some processes inside the Forum, partially taking it away from member CSOs themselves (Interview during EaP CSF 2018 Annual Assembly in Tbilisi).

Furthermore, the majority of the CSF members from the EU originate in the Central and Eastern European member states and Sweden (Belgium is an exception as a seat of many networks and pan-European CSOs), making it challenging for the EU to enhance links between CSOs from EU and EaP countries (CEPS Special Report 2014).

Some of the most important and most meaningful consultation processes take place at **national level**. All key programmatic documents are regularly consulted with civil society actors. CSOs in all countries of the region confirm that such consultations are meaningful and that they allow CSOs to contribute to the evolution of EU objectives with regards to civil society engagement and beyond it, including bilateral EU-EAP country relations.

The evolution of **EU civil society Roadmaps** from first generation (2014-2017) to 2018-2020 is accompanied by the increased inputs of CSOs into their drafting. **In Georgia**, the EUD organised three rounds of country-wide CSO consultations, with very good inputs from all sections of local civil society; an EUD interviewee in Georgia even reported a certain 'consultation fatigue' with some civil society organisations 'not mobilising for certain consultations due to their abundance'.

In Armenia, as EUD staff recognise, the 2014-2017 Roadmap was not thoroughly consulted with civil society organisations and, for the new 2018-2020 iteration, the EUD opened the Roadmap to wide consultations. One major Armenian CSO interviewee suggested that the consultation process may have actually been 'too participatory' and that a less inclusive, more expert-driven consultation process may have been more beneficial. Out of a total of 18 interviewees (CSOs, public institutions and EU staff), 12 provided a positive assessment of EU consultation processes as improving over time.

EUDs use other, more **ad-hoc formats of consultations on objectives**, including the so-called 'breakfast meetings' or informal meetings between high-level EU representatives (e.g. Commissioners) and local civil society organisations. In Armenia, the country's most experienced CSOs are invited to the meetings, although some interviewees in the country noted that organisations invited to such meetings are treated as sources of expertise and advice but are not the same group as grant recipients.

The 2018 EaP Civil Society Facility scoping report for **Armenia** confirms high stakeholder satisfaction with this approach: 'CSOs highlighted a very positive trend of regular EU promotional events that are taking place in the regions of Armenia. EU grantees and other EU partners are invited to present during these events. Furthermore, local residents are very receptive to the idea of meeting EU Delegation staff. These meetings help foster good relations with residents and advance trust building between Armenia and the EU. All interviewees highlighted that there is a positive tendency in communications with the EU Delegation. CSOs still prefer to appeal to the EU Ambassador directly as they believe this is the most effective manner in solving problems that arise. CSOs find it very important to know whom to contact in the EU Delegation. Clearly, positive messages sent from the EU Delegation to civil society receive response. Therefore, methods of collaboration need to be openly discussed.

In Ukraine, CSOs across the country reported high levels of consultation and an open attitude of the EUD: CSOs provide inputs to consultations on a wide-ranging set of issues including the Visa Liberalisation Action Plan, human rights, anti-corruption and environment. Some Ukrainian CSOs noted an absence of any clear criteria for consultation participants. During the Ukraine field mission, 9 out of 35 interviewees (CSOs, public authorities, EU staff) provided feedback on EU consultations regarding objectives – 7 out of 9 were positive about the quality of the consultation process, and two voiced reservations about the impact and follow-up on consultation results.

In Belarus, due to the exceptional character of civil society and restricted space in the country, the EU invites civil society representatives (only from Belarus) to participate in regular meetings of HR Dialogue and EU Coordination Group in Brussels twice a year. This allows CS to come with their alternative proposals – and the EU facilitates the dialogue. In the words of one EEAS interviewee, the most critical challenge in Belarus consultations is 'the lack of participation of CS in the decision and policy-making process at national level'.

The findings of the survey of civil society respondents serves to confirm the value of the consultation processes, although some respondents raised a concern that a relatively small group of participants tends to be consulted, and that there is a need to widen the engagement. This is accompanied by a call to engage with a broader range of societal actors, to ensure that the needs of all parts of the community and society are addressed, not only the needs of CSOs.

Some survey respondents from Belarus have raised similar concerns about government limits on civil society, restricting the scope of any consultations, and about the fact that EU is working more frequently with government bodies and pro-government NGOs 'EU support should be viewed as a subject that has a strong impact on the very formation and functioning of civil society. In recent years, EU support has been redirected to organisations close to GONGO, and topics not related to civil sphere'.

Survey respondents from Georgia, Moldova and Ukraine did not have any specific comments about the consultation processes or formulation of EU objectives.

Judgement Criterion 1.2: The EU's approaches to supporting and engaging with civil society have evolved effectively in line with the needs of civil society actors over this period in Neighbourhood East.

Indicator 1.2a

The appropriateness of the targeting of engagement activities, including outreach and diversification questions

There is general recognition among stakeholders across most categories (including civil society organisations, wider civil society, public bodies and international organisations, both in EaP and in the EU) stakeholders that EU support has adapted in line with the evolving needs of civil society, and it has served to shape proactively developments in the region (although there is variation across the six countries with regard to perceptions of the extent to which the EU's approach has adapted sufficiently and effectively).

This indicator was approached through the study of children's rights, as an example of one specific theme of EU engagement with civil society. Evidence suggests that support on this theme has provided a clear example of the focus of EU support on local needs and priorities in the Eastern Neighbourhood countries.

One recent review of EU support to children's rights worldwide found that, between 2011 and 2017, EU co-financed CSO actions addressing children's rights in the Eastern Neighbourhood countries increasingly focus on child protection and participation rights. This reflects a context where the state is increasingly able to address

children's basic or 'survival rights,' which are the major focus of EU support to children's rights in developing countries. It also reflects the evolving expectations and needs of the society, in which CSOs play an essential catalyst and representation role.³²²

Another study found that in neighbourhood countries, particularly Armenia, Ukraine and Jordan, EU spending on the fight against the worst forms of child labour is higher than would be expected considering the prevalence of child labour in these countries. CSO effective lobbying and implementation capacity was identified as one of the explanations for this evolution of EU spending.³²³

Survey respondents from Armenia have pointed to a positive trend in the evolution of EU objectives and consultations on the ground: "The EU support to civil society in the stated period has been very different over different periods of time, which largely coincided with the change of delegation heads and key staff. In the initial 6-7 years it was largely unsatisfactory as it went to a large number of government affiliated and very weak organisations for work that they were not able and/or willing doing properly. Simultaneously, independent organisations, particularly the ones which were critical to the government did not receive much needed support. This mode of work did not contribute to independent civil society development, on the contrary it contributed to the government's capacity to marginalise and undermine the independent organisations. In the last 2-3 years, the support is more even: string independent orgs started getting support, unfortunately along with legacy support to the old and largely useless ones.' (Armenian CSO survey respondent).

EU's support for CSOs in Azerbaijan is perceived as vital, especially in areas that are deemed less politically contentious and controlled: "EU support has been instrumental for survival of the civil society organisations especially during 2015-2018 when many of organisations were closed as a result of sharp local currency devaluation of 100%. Only few civil society organisations survived the local currency devaluation crisis that were lucky with getting EU support or other International organisations random support. Thanks to EU support to civil society organisations it was possible to promote development of start-ups , enable micro-businesses to diversify and expand their businesses in rural regions that was specifically targeted self-employment and job creations among youth and rural women,' (Azerbaijan CSO survey respondent).

The targeting of engagement activities is generally evaluated positively, with a positive change trend observed across forms of engagement and modalities (see JC1.2b and JC2.1a) but numerous sources across different levels of analysis indicate that there is **potential for further outreach and diversification** within current forms of engagement and modalities. Most of evaluation evidence and documentation pertains to targeting of engagement activities for CSOs rather than civil society at large. At the same time, as respondents to the online survey noted, caution is required when broadening the outreach – in the case of Belarus, the widening of support from NGOs to CSOs, and organisations such as research institutes, is perceived by most respondents as a negative development, as such actors are not considered to be independent of government. Across the region there is a general concern among respondents that EU support is used to fund GONGOs, and an elite sub-set of strong CSOs, while the needs of smaller independent CSOs continue to be relatively less addressed.

One of the main challenges in outreach and diversification is the issue of **concentration of CSOs in capital cities**, and significant funds going to **larger and stronger organisations with significant capacity**, with less consideration for smaller and especially grassroots organisations (see also JC 2.1a). The 2015 'Evaluation of the European Union's co-operation with Georgia (2007-2013)' indicated that nearly half of EU targeted support in Georgia was channelled via national NGOs:

'According to the inventory analysis, 43% of the total EU aid channelled through NGOs was channelled through Georgian national NGOs. An issue of consequence is the balance of support as between Tbilisi-based NGOs (the largest of which may have regional offices), regional NGOs mostly located in the secondary cities of Georgia and grassroots local NGOs. Most donor support obviously goes to the former because the latter do not have the capacity to implement projects of significant size. Yet, there was a significant presence of regional NGOs, particularly in implementing projects in the domain of agricultural and regional development (see below) but also civic education, criminal justice, and IDPs (monitoring and community relations). According to the inventory, of the 43% of total support channelled through NGOs that went through national NGOs, the ratio of Tbilisi-based to region-based was about three to one. All Civil Society representatives interviewed during the field mission expressed,

³²² Novak and Tomankova (2017) "Overview of EU operational support to children's rights (January 2011-March 2017)"

³²³ SACO (2016) "Tackling Child and Forced Labour: assessment of projects, orientations for future actions and identification options," specific contract 2015/368963, pp.63-64.

one way or another, the need to shift support to NGOs outside Tbilisi, to get away from the practice of implementing projects in the regions through regional offices of large Tbilisi-based NGOs, and to generate more grassroots projects.'

Another challenge in outreach is the relatively **small group of organisations regularly participating in consultations**. Out of 12 CSOs interviewed during the Armenia field mission, eight observed that the local EUD frequently consults the same organisations on civil society matters, and that although this so-called 'breakfast club' (organisations invited to informal meetings with high-profile EU visitors) is a good source of expertise, it remains a fairly static group, and involving new and grassroots organisations is a challenge.

The EaP Civil Society Facility Scoping Report for **Ukraine** reports that CS activists are under threat of harassment by authorities and interest groups that they challenge, notably in the field of anti-corruption and in illegally annexed Crimea as well as non-government controlled territories in the East of the country. On a positive note, recent evaluations of EU's engagement with civil society in Ukraine confirm that EU support to civil society in Ukraine has evolved significantly since 2007, most notably after 2014 and that the EU has 'diversified its support programmes and cooperation with CSOs'. The report further notes that outreach activities remain challenging for all Ukrainian CSOs notably with regard to vulnerable groups, strengthening CSOs own outreach strategies to broaden their local support base, and CSO outreach to constituencies, as well as greater outreach to non-Kyiv-based CSOs. The report also notes that modalities under the **Civil Society Facility** are 'particularly appreciated by CSOs with regard to capacity development, outreach to smaller CSOs and in facilitating CSOs work in the reform arena'. (Evaluation of EU support for Civil Society in Ukraine 2007-2015 - unpublished). The Civil Society Facility project is also reaching out to young activists in the EaP region (and beyond), in capacity-development activities, including the organisation of hackathons aimed at providing solutions to community and societal needs – thereby encouraging the spread of innovative use of ICT among civil society actors.

Another area with outreach challenges is communication. In **Azerbaijan**, most CSOs benefitting from EU targeted support have undergone training in EU visibility requirements, have received a "Communication and Visibility Manual", and have systematically consulted the EU Delegation in their outreach activities: 'All outreach materials, observed in the course of the interviews had the appropriate EU logo and acknowledgement notices. Many organisations said that they also placed the EU logo on their websites.' (Evaluation of EU support to civil society in Azerbaijan in 2007 – 2013). Most interviewees in other field mission countries note an improvement in EU communication including to CSOs in recent years, with a more streamlined use of channels and key messages, but also further stress the need to increase communication to the general public, helping to bridge the gap between civil society and society.

An Armenian CSO respondent noted that 'Activities of civil society member NGOs in the Republic of Armenia are often consistent only in the works within the framework of certain grants. Meanwhile NGOs should have the opportunity to maintain their own activities, in accordance with the mission and goals of the Charter. However, deviations from this purpose and mission are often noticeable within the scope of grants. That is why some NGOs are developing, others are weak, and some are deviating from their official mission and purpose. Dialogue tools are weak with government agencies and often NGOs have no knowledge of it. Consequently, EU support can be clarifying, improving of those dialogue tools and using it in monitoring.'

A 2016 study by DEVCO's CSO Roadmap Facility reports that **the EUD in Georgia has made significant efforts to improve the national, multi-donor and private financial framework for civil society funding in order to facilitate their future sustainability**. *"During 2016, the EU funded actions for developing alternative sources of funding for civil society, with a focus on advocating for the establishment of state funding mechanisms, examining best practice and supporting the development of transparent funding award and management mechanisms. Actions also included awareness-raising on the concept of corporate social responsibility (CSR) and the development of recommendations for a more conducive regulatory environment in support of CSR."*³²⁴ According to the same report, the growing EU commitment to improving the financial framework for civil society funding was based on the findings of the 2014 mapping of civil society in Georgia and the subsequent preparation of the EUD's Roadmap for Engagement with Civil Society.

³²⁴ EU (DEVCO.A.5 CSO Roadmap Facility) (2016) "EU Support to the Enabling Environment for Civil Society Organisations in Partner Countries"

Indicator 1.2b	The appropriateness of choice of implementation modalities
<p>Across all instruments, the EU's engagement with civil society used a wide range of implementation modalities: grant contracts and sometimes service contracts with CSOs, as well as growing use of regranting/Financial Support to Third Parties, technical assistance to manage capacity development and grant-making facilities, as well as attention to CSOS in the formulation of conditions for sector budget support.</p> <p>The need for a more flexible and responsive modality for CSOs operating in restricted environments, reported in numerous evaluations, resulted in EU's support for the creation of the European Endowment for Democracy through which they regularly channels civil society funding for Neighbourhood East through EED to support organisations and actors in countries with restricted spaces for civil society, notably Belarus and Azerbaijan. Although EED is not an EU institution it is widely perceived as complementary to EU's engagement with civil society in the region, as confirmed by CSOs during field missions in all three countries visited (Armenia, Belarus, Ukraine).</p> <p>Flexibility, evolution and responsiveness to changing realities on the ground was positively assessed. In Armenia, the EU reacted very promptly in 2018 to the changing political reality in the country and arising needs of CSOs. In Ukraine, the modalities for engagement with civil society have become more focused and relevant to the needs of civil society, for example by allowing for more flexibility in sub-granting. During the political crisis of 2013-2014, 'The EU has also been flexible and responsive to changing contexts and responded rapidly to the developments of 2013-2014 in Ukraine by allocating money to support the government alongside the earmarked and flexible support for civil society.'³²⁵ Sub-granting, indicated as a favoured form of support especially among smaller and grassroots organisations (see also JC2.1a), was increasingly embedded in programming documents and supported as a modality - the Action Fiche for the Eastern Partnership Civil Society Facility 2017 notes that 'With the increased outreach policy of the EU, more and more EU Delegations and regional projects implemented for and/or through CSOs have a financial support to third parties component (for example sub-granting). Sometimes 'financial support to third parties' is the main purpose of the action. The experience so far has shown that financial support to third parties allows reaching out to CSOs that are not able to directly apply for EU grants.'</p>	
Indicator 1.2c	The appropriateness of forms of engagement with civil society (targeted support, mainstreamed support, policy dialogue)
<p>Stakeholders overwhelmingly confirm the appropriateness of forms of engagement with civil society (targeted support, mainstreamed support, policy dialogue) in the Neighbourhood East region in the period under evaluation (2007-2018). The three forms of engagement directly address the objectives defined in the relevant policy documents (see JC 1.1a) and are duly considered in programming documents such as Roadmaps. Roadmaps present different forms of engagement (and related analysis) in a clear and structured manner, with clear analysis of problems as justification for chosen actions.</p> <p>Targeted support is the most commonly quoted form of EU engagement with civil society across all units of analysis. Operationalised through bilateral, regional and global/thematic instruments (see JC 1.2b), it gives CSOs in Neighbourhood East the most direct and independent role in planning, implementation and sustainability. Most local stakeholders confirmed the appropriateness of targeted support, but some voiced their criticism towards complex procedures and technical requirements as well as concentration of targeted support engagement in capitals and main cities. In some countries in the Neighbourhood East, notably those with restricted spaces for civil society, targeted support is channelled via international organisations rather than local stakeholders. For example, an evaluation of EU engagement with civil society in Azerbaijan found out that 'the prevalence is still of the international CSOs (29 projects), although Baku-based organisations have also been fairly successful in obtaining EU grants (27 projects). Participation of local or region-based CSOs in the capacity of lead organisation has been very low (with regional/local NGOs as main applicants being in charge of 3 projects only), but has nevertheless been more significant when it comes to their participation as main partners or co-applicants of international organisations (6 projects)' (Evaluation of EU support to civil society in Azerbaijan in 2007 – 2013).</p>	

³²⁵ Evaluation of EU support for Civil Society in Ukraine 2007-2015' - unpublished

Policy dialogue (policy engagement) is considered an appropriate and relevant tool across all units of analysis but its appropriateness varies greatly from country to country in the Neighbourhood East. In countries with a closer relationship with the EU, notably those with an Association Agreement/DCFTA, policy engagement of CSOs in various aspects of both national and EU policy is considered the norm. In countries with restricted spaces for civil society, opportunities for policy engagement are limited and stakeholders widely report that genuine policy engagement is only conducted with EU's support whereby national policy engagement structures and processes lack genuine and independent CSO participation. Policy dialogue remains a key priority across all programmatic documents in the region, notably Roadmaps 2014-2017 and Roadmaps 2018-2020 and local civil society stakeholders regularly confirm the appropriateness of and relevance of policy dialogue as a form of engagement with the EU and especially in a tri-party dialogue with national authorities. The EU is seen as increasingly involving CSOs in policy dialogue and supporting CSOs to engage through other channels. The 2018 'Evaluation of EU support for Civil Society in Ukraine 2007-2015' (unpublished) states that, in Ukraine, 'the EUD Delegation [in Kyiv] has expanded its support to CSOs through the Civil Society Facility in order to develop CSOs' capacity to support their involvement in policy dialogue and reform process in Ukraine. For example, the Civil Society Facility call for 2012 focused on involving civil society actors in policy dialogue with the government authorities on implementation of such sector strategies as energy, environment, public finance management, migration and regional development. Over 20 CSOs' projects were funded within three calls for proposals of 2012, 2013 and 2014'.

Some survey respondents suggested that although policy dialogue does happen in a more structured and systematic way, and that this in itself is an achievement, it is the feedback to policy engagement and consultations and long-term results (see EQ3 and 4) that are a problem. 'Policy dialogue did not lead to any major changes in the policy of the authorities of the Republic of Belarus with regard to the civil society of Belarus. The attempts made are good for us, but not effective.' And 'The decisions and resolutions of Civil Society Forum are rather on paper and do not take any further by the governments' (Belarusian survey respondent). A number of civil society interviewees in Armenia and Georgia voiced similar concerns – even when policy dialogue takes place, it is the follow-up to policy engagement activities and a feedback loop that is not clear.

Mainstreamed support is generally confirmed as a relevant and appropriate form of engagement but here the evaluations have produced only limited findings.

Roadmaps from all countries in the region show that CSOs are regularly consulted on matters of programming and implementation. All 'first generation' Roadmaps (2014-2017) make references to mainstreaming with important differences between countries. In Armenia, the 2014-2017 roadmap shows that CSOs were consulted on the 2014-2020 programming cycle as well as on thematic programmes (Armenia 2014-2017 Roadmap) with good responses from local civil society. In the Azerbaijan 2014-2017 Roadmap, mainstreaming occupies a less prominent space but there is evidence of active responses to mainstreaming in a few sectors, such as rural development and PFM, but with EUD's assistance to building capacity of local CSOs to engage. The Belarus Roadmap notes that mainstreaming helps obtain up to date information about the state of civil society but fails to outline specific sectors concerned. The Georgia Roadmap (2014-2017) notes mainstreaming taking place in all key sectors of EU programming including justice reform, PRM, agriculture, education and regional development, with active CSO contributions and permanent consultation structures involving the government. The Moldova Roadmap (2014-2017) identifies key focal sectors for mainstreaming, notably public administration reform; agriculture and rural development and; police reform and border management, but there is no evidence of active and structured local component involving the government. The Ukraine Roadmap (2014-2017) links mainstreaming to Association Agreement implementation and stipulates support measures for civil society involvement across most EU programming sectors.

Mainstreaming is noticeably less prominent in 'second generation' Roadmaps (2018-2020) released at the time of evaluation (December 2018).

In interviews, local CSO stakeholders voice overwhelmingly positive feedback on the need for mainstreaming but also express the opinion that mainstreaming of civil society across sectors of bilateral cooperation is a relative novelty in the region thus resulting (in their opinion) in low capacity and low levels of expertise on the issue.

Mainstreamed support is rarely included in evaluations of EU support to civil society. Two recent EU civil society country evaluations (Azerbaijan and Ukraine) do not contain any references to civil society mainstreaming, and focus on support via the thematic programmes and stand-alone CSO support facilities. Similarly, the recent reports commissioned by DEVCO A5 on progress towards the three priorities of COM (2012) focus almost exclusively on actions co-financed under the CSO-LA thematic programme.

One Armenian CSO survey respondent noted that ‘the EU looks several steps ahead and identifies the pathways for the civil society that in the future can serve as key factors for the stable development of civil society.’

The development over the period 2007-18 of an increasingly complex and strategic approach by the EU towards its support and engagement with civil society is remarked upon by a range of respondents, from international organisations and civil society. As one survey respondent stated: ‘Initial interventions till 2012 were minimal but since then EU has increased its presence and quality of support and in 2018 was one of the main agenda shapers in Neighbourhood East countries’.

FPAs have not been a significant modality in EU support to civil society in the Neighbourhood East region. Of the 23 FPAs signed by mid-2016, none had a regional focus on the Eastern Neighbourhood, or on the broader East European and Eurasian region.³²⁶ Rather, FPAs reflect the long term partnerships and priorities of the West European CSOs, in Africa, Latin America and West/South/South-East/East Asia. The few FPAs that somewhat address the Eastern Partnership countries are the younger CSO networks and federations focusing on transparency, human rights and CSO networking in the broader European space.

Indicator 1.2d	Consultations with civil society actors and organisations were used to inform the evolution of EU approaches.
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Survey respondents from Azerbaijan have highlighted that although the EU does use various consultation frameworks their outreach is limited by the wider restrictions on civil society in the country. One AS CSO responded stated ‘Government restrictions on CSOs make EU operations very difficult. EU tries to adapt but this is very difficult. EU supports CSOs based abroad, they do not have a big influence on what’s happening in AS.’

EQ2 (Efficiency): To what extent has the scale of resources deployed been justified considering the changes/results produced? To what extent have efficiency gains, or losses, occurred?

Judgement Criterion 2.1: The scale of resources deployed for targeted support has been appropriate in Neighbourhood East.

Indicator 2.1a	Extent to which the choice of modality, and their mix, led to increased outreach to grassroots organisations
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The evolution of EU support (such as the greater use of Financial Support to Third Parties) and the broadening of the range of civil society actors engaged under this support has led, generally, to an increased outreach to grassroots organisations in the Neighbourhood East region, at least in terms of funding.

Results and appreciation of this trend differ significantly from country to country.

In Georgia and Armenia in particular, survey respondents confirmed the progress seen under this diversification, with positive developments also noted in Ukraine and Moldova.

However, in Azerbaijan and Belarus, CSO respondents in particular perceived the expansion of EU engagement to new types of civil society actor (beyond the established pro-European NGO community) as a negative trend. In Azerbaijan, interviewees spoke of a contraction of engagement with ‘genuine’ or ‘independent’ civil society following moves by the government to clamp down on the civil society sphere. This occurred alongside an expansion of EU support to other civil society actors, some of them perceived by the EU’s traditional CSO partners as close to the regime. In Belarus, the diversification of EU financial support has, in the view of CSO interviewees – increased engagement with organisations that are seen as being connected to the government, rather than with independent civil society organisations and actors.

³²⁶ For a list, see for example https://www.partnershipforum2018.eu/images/Docs_EN/Fact_Sheet_CSOs_FPAs.pdf

Outreach to grassroots CSOs remains a global challenge for the EU as well as other donors. The Mid-term review report of the External Financing Instruments (2017) finds that, in general 'The cumbersome administrative procedures make it difficult for smaller civil society organisations and social partner organisations (trade unions and employers' organisations) to get involved in project implementation or may distract from the core business of the association'. CSO stakeholders during field missions in Armenia, Belarus and Ukraine confirmed that indeed access to EU funding is challenging for smaller and grassroots CSOs because of administrative requirements in terms of registration, capacity and experience. Furthermore, social partner organisations interviewed confirmed that use of EU sources is not widespread among trade unions and employer organisations in the region. Survey respondents note the requirements for co-funding in the case of applications for large grants is regarded as a barrier for CSOs to participate.

At the regional level, countries with restricted spaces for civil society record least progress with outreach to grassroots organisations. According to the EUD in **Belarus**, organising events outside Minsk is difficult even for the EUD itself due to severe restrictions on diplomatic missions' activities and on public events in the country. Even more severe restrictions are in place for CSOs and private entities engaging in any public or visibility activity. One CSO interviewee in Belarus noted that a piece of multimedia material produced with EU support had to be stripped of any signs of donor funding (including EU logo or name) before it could be shared in schools in Belarus. Several attempts at organising information or consultation events outside of Minsk have failed for this reason and there is no immediate remedy. It remains similarly difficult for Belarusian CSOs to operate in the field and to use proven networking and collaborative approaches, also restricted by legislation including the registration requirement that puts an administrative burden on recipients of foreign donor funding. In the words of one Belarusian CSO interviewee, supporting grassroots CSOs in Belarus is a 'chicken and egg problem - EU wants to develop capacity, but also need strong partners [with good capacity] to work with'. Belarus civil society interviewees noted that more flexible instruments such as EIDHR and EED are more suitable for reaching out to certain smaller and grass-root CSOs notably in media and human rights, but this is not always pertinent to those in rural areas or other sectors.

In **Azerbaijan**, similar restrictions remain in place, and the recent country-level civil society evaluation makes no references to grassroots outreach. The Azerbaijan EU Country Roadmap for Engagement with Civil Society 2014 – 2017, notes that 'CSOs find it increasingly problematic to organise events, including EU funded ones, both in Baku and the regions (e.g. an EU-Human Rights House funded human rights exhibition was obliged to close down, several CSOs had their events cancelled at the last moment by hotels in Baku)'. The use of the EIDHR, which offers more flexibility in support to CSOs compared to other instruments, as well as the EED has led to a better outreach to grassroots, although, as survey respondents noted, access to funding under EIDHR calls has now been curtailed.

In such cases (Azerbaijan and Belarus), the EU's partnerships with multilateral organisations such as the Council of Europe or UN can be used to leverage access – drawing on the mandate of such organisations, and the fact that most EaP countries are member states of the organisation and signatories to conventions, etc.

On the other hand, in the four countries with more favourable civil society environments, the EU noted significant progress in increasing outreach to grassroots organisations. In **Armenia**, a country with 4000 CSOs, at the time of the field mission (November 2018), three CSO capacity-building projects were in operation with a significant sub-granting component. One such intervention, the STRONG Civil Society Organisations for Stronger Armenia project, worked with 301 CSOs, most of them outside Yerevan and, just within one Work Package, has effectively reached nearly 10% of the country's CSOs.

EUDs remain acutely aware of the challenges in reaching out to the grassroots level and constantly seek new solutions to address the problem, including advising on alternative solutions and other donors. The Armenia Roadmap 2014-2017 notes that 'unable to implement unrealistic requests for operational changes, the Delegation [in Yerevan] considers provision of bigger grants allowing re-granting, which can be managed mainly by bigger international NGOs able to demonstrate necessary capacity. In relation to the smaller grants, the EU Delegation regularly recommends that Armenian CSOs/CBOs/civic movements to direct their applications to the European Endowment for Democracy, which was created to support smaller initiatives on more flexible and less bureaucratic basis.' (Also see JC 1.2b).

In **Georgia**, interviewees representing both CSOs and donors agreed that EU funding procedures often exclude very small, grassroots level NGOs, and that most EU support goes to Tbilisi-based organisations (EaP CSF 2018 Annual Assembly Tbilisi). According to a country evaluation from 2014, a ratio of national CSOs to grassroots ones in Georgia stands at about three to one, but the evaluation notes that the situation has been getting better and that 'it would be incorrect to say that EU funding has gone only to the elite few'. What is more, the problem of grassroots CSOs in Georgia goes beyond donor help, as CSOs note low levels of trust in the society. Previous

evaluations also note that grassroots are one of several groups excluded from a number of funding instruments together with others such as 'faith-based organisations, diaspora organisations, the media, and private sector organisations'³²⁷

In **Moldova**, similar problems are noted. Although 'EU Funding is considered transparent, however, small organisations cannot access direct funding because of low management capacities' (Moldova Civil Society Fiche, 2018). The local EUD in Chisinau actively addressed the problem by launching a call for CSO sub-granting report in 2017. The EaP CSF Scoping Report for Moldova also notes that 'the introduction of fewer, larger grants with the obligation to re-grant 70% of the awarded total is expected to facilitate access to EU resources by smaller and regional CSOs. The [Moldova] Delegation believes that this will help build their capacity and contribute to their medium-term sustainability. Regional CSOs, e.g. in Gagausia and Transnistria as well as in Moldova's oblasts and rayons [administrative unit], however, experience major capacity challenges. Nonetheless, there is emerging evidence that their current experience-led capacity development has increased their confidence and willingness to engage with, particularly, local authorities and donor organisations'.

In **Ukraine**, the EU funds a number of interventions targeting grassroots organisations and building capacity across the country, including a large-scale intervention with a sub-granting component, Civic Synergy, implemented via the local Open Society Foundation office (International Renaissance Foundation). During the field mission, 14 out of 24 CSOs interviewed offered feedback on EU sub-granting – 10 out of those 14 presented an overwhelmingly positive picture of the situation, indicating that EU focus on sub-granting and outreach to grassroots is increasing, and that this is a largely successful endeavour. Local CSO networks noted in interviews that the EU does not seem to have a preference for local networks in capacity-building work, often contracting international consortia and international NGOs (albeit on a merit basis). This results in outreach work being further removed from local realities and expertise, and in the eyes of local CSO networks lowers its efficiency. The case of Ukraine serves as an example of how EU funding can be used to support civil society developments in a flexible manner, through the engagement of a multilateral implementing partner organisation: the EU-funded UNDP Community Based Approach (CBA) programme, implemented over three phases from 2008-17, engaged local communities in the implementation of grassroots led micro-projects that aimed to achieve tangible infrastructural outputs for the community, with over 1500 projects implemented across the country. As the final evaluation report for CBA noted, the initiative had made a substantial contribution to civil society development and social cohesion in the communities that it engaged, through empowering individuals and communities to become change agents. The programme also led to positive outcomes in building relations between citizens and local authorities, in the context of decentralisation of administration (Final evaluation of programmes 'Community Based Approach for Local Development Phase III' and Support to Ukraine's Regional Development Policy).

Across **all countries of the region**, stakeholders agreed that grassroots organisations should remain an important part of EU engagement strategy, notably in the context of disseminating information about the EU to wider societies of all countries of the region. During all three field missions in Armenia, Belarus and Ukraine, all CSO interviewees agreed that further outreach to grassroots is necessary.

Absence of grassroots outreach is notable in the sample of targeted interventions reviewed in the evaluation of EaP region, with 5 out of a total of 27 targeted interventions in the region making note of outreach to grassroots. Triangulated against other sources and units of analysis, this suggests a lack of appropriate monitoring and reporting rather than an actual problem with grassroots outreach at project level.

Survey respondents across all six countries of the region note the numerous challenges faced by grassroots organisations both in terms of access to EU support as well as policy dialogue and mainstreaming opportunities. One Swedish CSO respondent working in the South Caucasus noted that 'In Georgia there is the DHCR mechanism; but it doesn't reach grassroots level; Armenia: low capacities of civil society to be able to apply, same with Azerbaijan'.

Media representatives interviewed confirmed that media remain on the priority agenda of local EUDs and can benefit from civil society support schemes in place including specialised instruments such as EIDHR, as well as the EU-financed EED.

³²⁷ Evaluation of EU Co-operation with Georgia 2007-2013, May 2015).

Indicator 2.1b	Extent to which pooling of resources has been utilised to achieve cost-effectiveness
<p>This evaluation did not find consolidated evidence of pooling of resources to achieve cost-effectiveness at any levels of analysis. Partial evidence suggests there is very little pooling of resources for cost-effectiveness. At the global level, some reports note a low level of pooling of resources between instruments. For example, the 2017 'Coherence Report - Insights from the External Evaluation of the External Financing Instruments' notes that, 'while Trust Funds have proved useful to mobilise funding from different EFIs, there have been fewer instances of a strategic pooling of resources among EFIs.' In any case, existing Trust Funds do not significantly focus on the six countries covered by this report.</p> <p>At regional level, no evidence of pooling resources to achieve cost-effectiveness could be identified. Nor could any evidence of pooling be identified in any of the Roadmaps or Guidelines for Applicants reviewed for this evaluation. Interviews with key stakeholders, including DG NEAR, EUD and EEAS did not identify any examples of pooling at programming level.</p> <p>The 2017 Coherence Report also noted that, at the global level, 'most evaluation reports do not expand on the possible synergies with other instruments'. None of the 37 targeted projects in the sample analysed for this evaluation refer to any pooling for cost-effectiveness purposes.</p>	
Indicator 2.1c	Extent to which considerations of cost-efficiency played a role in the use of available instruments (geographical and thematic) and aid modalities.
<p>Staff in EUDs recognise the cost-efficiency of the FSTP modality as a more cost-effective way of reaching out to a larger number of CSOs.</p>	
Indicator 2.1d	Extent to which efficiency gains, or losses, have occurred.
<p>Several CSO interviewees suggested that modalities channelling funding through government-organised NGOs (GONGOs) and public institutions are not cost-efficient and that in their opinion CSOs are likely to deliver the same results at a significantly lower cost. One government interviewee alleged that one of the international organisations receiving EU funds for civil society engagement, including providing a re-granting facility, had exceptionally high administrative costs (30%) and that this was proof of inefficient use of funds. The use of UN agencies to support CSOs in countries with a particularly restrictive environment for CSOs (Azerbaijan) was recognised by most stakeholders interviewed as an expensive but effective modality.</p>	
Indicator 2.1e	Extent to which institutional capacity of partner organisations was assessed at programming, implementation and monitoring stages.
<p>The institutional capacity of partner organisations is systematically assessed across most partners at programming stages for EU engagement across the targeted intervention spectrum, and sporadically (ad hoc) at implementation and monitoring stages.</p> <p>At programming stages, Brussels-based institutions such as DG NEAR, EEAS and DG DEVCO as well as EUDs in Neighbourhood East countries have comprehensive capacity assessment systems. Activities of the CoTE on Civil Society at DG NEAR can be highlighted as an example of a good mechanism for assessing civil society capacities. CoTE's knowledge generation and coordination of matters related to civil society, including monitoring of the situation in the sector and updating Country Fiches on the situation assists regular capacity assessment. Furthermore, DG NEAR uses targeted support to increase its knowledge base as well – the Eastern Partnership Civil Society Facility Scoping Reports on Civil Society in each EaP country provide detailed insights into capacity in all countries of the region. For programming of national-level interventions, EUDs proactively liaise with relevant teams in Brussels, notably at DG NEAR and EEAS, to triangulate global and thematic priorities with regional and national ones.</p>	

At implementation and monitoring stages, there is limited evidence of assessment of institutional capacity of partner organisations. Only three of the 37 sample projects for this evaluation have been monitored by the EU through ROM missions.

The mid-term review report of EIHDR notes that monitoring of the programme remains to be further developed, including specific evaluation indicators.

EUDs staff in the region report significant workloads in the relevant civil society desks/units and recognise that they have limited capacity to assess capacity of implementing partners through regular monitoring or during implementation.

In **countries with restricted space for civil society**, monitoring institutional capacity is more difficult than in countries with less restrictive regimes. One Brussels interviewee working with civil society engagement in Azerbaijan noted that 'due to legal requirements much of EU's support to CS [in Azerbaijan] is outsourced to UNDP, which reduces the administrative burden (...) but makes it difficult to monitor and assess the partner organisations.'

Indicator 2.1f

Extent to which monitoring and other mechanisms are deployed in order to ensure cost-effectiveness of targeted support.

Policy and strategic documents do not contain comprehensive details on monitoring mechanisms or other mechanisms deployed to ensure cost-effectiveness. There is some evidence of planning of monitoring instruments to ensure cost effectiveness at programming stage. The Action Fiche for Eastern Partnership CSF (Civil Society Facility) elaborates that "[i]n anticipation of use of financial support to third parties becoming the norm, a qualitative monitoring system needs to be foreseen, with checks in place that would prevent possible doubts on the accountable use of financial support to third parties. Evidence will also need to be collected on the effectiveness of this policy against its set objectives. Ability to capture successes and create synergies between actions to support the successful actors that emerge from small scale support is also much needed to avoid fragmentation of support."³²⁸

When it comes to **implementation**, there is a wide-spread perception among CSO interviewees at **national and local level** in the region that the EU does not pay significant (sufficient) attention to **monitoring of implementation** in general, including issues of cost-effectiveness in targeted interventions. Civil society interviewees during field missions in Belarus, Armenia and Ukraine noted the absence of adequate monitoring and other mechanisms to ensure cost-effectiveness of targeted support [In Armenia, eight out of eighteen interviewees].

Judgement Criterion 2.2: The scale of resources deployed for mainstreamed support has been appropriate in The Neighbourhood East

Indicator 2.2a

Extent to which monitoring and other mechanisms are deployed in order to ensure cost-effectiveness of mainstreaming activities.

ROM reports for the region were not assessed, reflecting the methodological focus on a sample of Actions. The number of action-level or country/thematic evaluations reviewed was not sufficient to generate findings regarding cost effectiveness.

A 2014 EaP Civil Society Forum report on EU budget support to the Neighbourhood East Countries (covering Moldova, Georgia and Ukraine), prepared by its Working Group 1 (WG1) notes that, even in countries considered regional success stories in terms of budget support absorption, like Moldova, civil society is not effectively involved in monitoring and evaluation of budget support and that more steps need to be undertaken to ensure proper oversight both in terms of civil society mainstreaming and monitoring of evaluation of this process.

The evaluators did not detect specific references to monitoring of cost effectiveness in the general guidance documents for mainstreaming in the Neighbourhood East or the sectoral fiches for mainstreaming refer to monitoring of cost-effectiveness.

³²⁸ Action Fiche for Eastern Partnership CSF 2017).

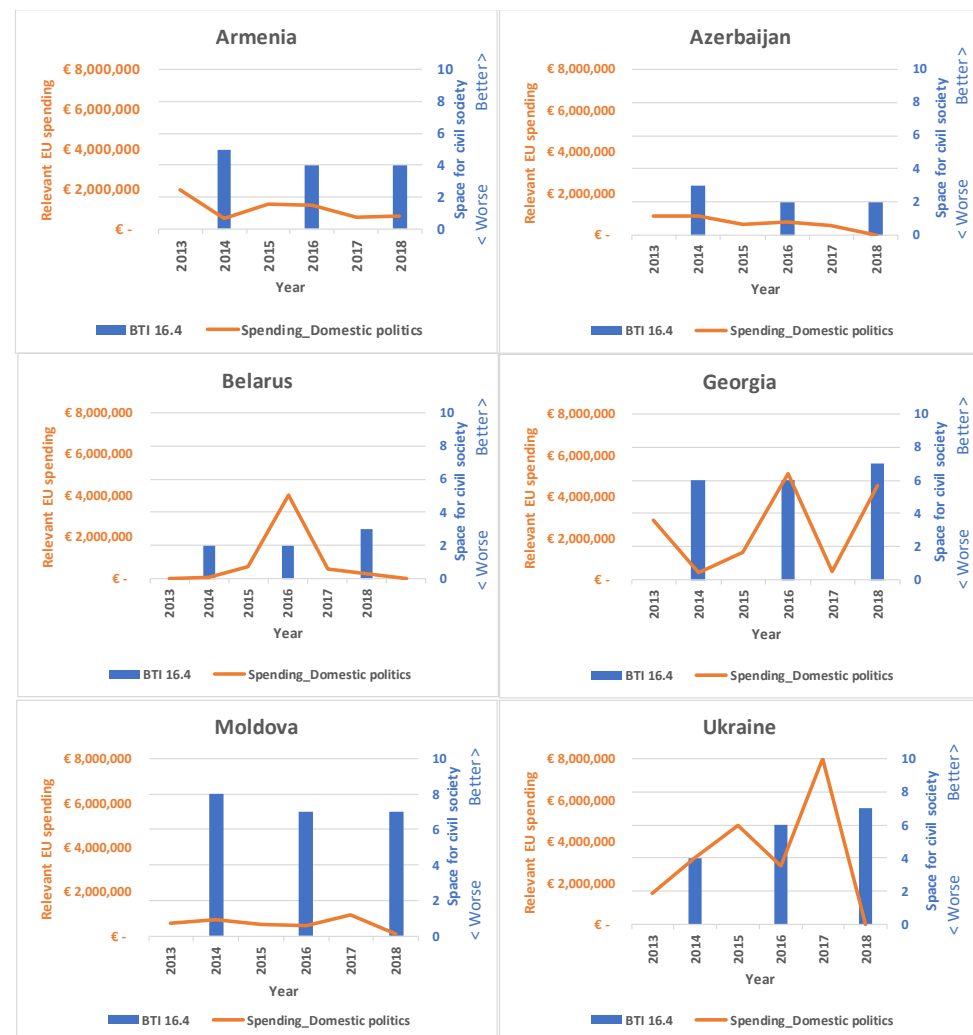
Indicator 2.2b

Extent to which institutional capacity of partner organisations was assessed at programming, implementation and monitoring stages.

Data to inform this indicator overlaps with that for Indicator 2.1b.

Judgement Criterion 2.3: The scale of resources deployed for policy-level engagement has been appropriate in the Neighbourhood East

Figure 10 Total spending on actions relevant to policy engagement in the Neighbourhood East, 2013-2018



The evaluators have analysed the volume of resources allocated to actions relevant to policy-level engagement, but have not generated other findings relating to the sample of policy-level engagement initiatives selected for this evaluation. We analysed the total spending on actions relevant to policy engagement (i.e. covering the targeted, mainstreamed and policy categories retained for this evaluation). These results are summarised in the charts below.

Our main findings are as follows: Support to relevant actions focused on policy engagement is somewhat concentrated on countries with more open environments. Spending in Azerbaijan and Belarus remained low throughout the years 2013-2018. Spending in Armenia was higher, but with a downward trend, in a context of medium openness compared to the other countries covered by this evaluation.

Curiously, spending was consistently low also in Moldova, where the environment was significantly more favourable. Considering Ukraine's much larger population, spending per capita was also relatively low throughout the period, in a context of medium openness. In contrast, in Georgia, spending was relatively high throughout the period, in a context of medium openness with an upward trend.

Source: Landell Mills' analysis of all contracts for external actions in the countries concerned (2013-2018). Classification of contracts relevant to CSO engagement in domestic politics done by the evaluation team, using Bertelsmann Transformation Index

Indicator 2.3a	Extent to which considerations of cost-efficiency played a role in the organisation of policy-level engagement activities
<p>The evaluation did not produce significant findings for this indicator.</p> <p>The evaluators did not address these questions in a sufficient number of interviews to establish reliable findings. The evaluators did not identify documents that could have been reviewed to provide insights on this Indicator.</p>	
Indicator 2.3b	Extent to which monitoring and other mechanisms are deployed in order to ensure cost-effectiveness of policy-engagement activities.
<p>The evaluators did not review ROM reports and identified and reviewed only a few evaluation reports. These issues were not addressed in sufficient interviews to provide a basis for reliable findings.</p>	

EQ3 (Effectiveness): What have been the effects of the EU's various forms of engagement with Civil Society in the Neighbourhood East region?

Judgement Criterion 3.1: The effects achieved through the targeted support to civil society have corresponded to the EU's initial objectives in the Neighbourhood East.	
Indicator 3.1a	Aggregate achievement of short-/mid-term results within targeted support
<p>The effects achieved through the targeted support to civil society in the Neighbourhood East have generally corresponded to the EU's initial objectives in the region, with most notable weaknesses in countries with restricted spaces for civil society (Azerbaijan and Belarus).</p> <p>There is abundant evidence of achievement of results within targeted support through capacity-building, developing an enabling environment for civil society and enhancing civil society involvement in policy cycles.</p> <p>Survey respondents commented most frequently on results pertaining to capacity-building of CSOs. Among the results reported in this area, respondents provided the following examples:</p> <p><i>a) ideas implemented together have further development; b) intersectoral and international contacts allow planning and modelling mechanisms for the implementation of new positive ideas for society. (Belarusian CSO respondent)</i></p> <p><i>Experience gained by NGO participants seriously increases their level and if a person remains in the organisation, this raises the overall level of organisation. At the same time, there are cases when such employees leave for larger projects or for the work of UN agencies.' (Belarusian CSO respondent)</i></p> <p><i>Increasing the professional knowledge of NGO members as a result of EU civil society activities, certainly affects the process of purposeful development of the whole society, as well as the country as a whole' (Armenian CSO respondent)</i></p> <p><i>The CSOs have achieved: - Enhanced institutional capacities; - Increased knowledge regarding national social policies and EU practices in this field by study visits and share of experience; - Better capacities for communication and share of experience through the established informal network; - Capacities to interact and to set cooperation with LPAs; - Enhanced capacities to provide youth social integration services. (Moldovan CSO respondent)</i></p>	

Survey respondents reported less frequently on results in developing an enabling environment for CSOs:

I am not sure to what extent we should connect the EU support in Armenia with the recent democratic developments in the country, as I am inclined to believe that they were advanced from within the country. But at the same time the amount of capacity, expertise and exchange the CSOs have had continuous access to in the past decades has definitely contributed to the efficiency of the democratic transformations in the country. (Armenian CSO respondent)

the 2% law adopted for creating sustainable mechanisms of funding of NGOs - Government started the accreditation process and in some of areas (such as youth development) the possibility to contract NGOs for service providing have been initiated - Improved consultation mechanisms and platforms developed to increase the active participation of civil society into the policy making process - Improved platforms for networking, exchange of experience and collaboration for sustainable partnerships with local authorities and private sector due to big projects aiming to encourage the cooperation between NGOs and central and local authorities. - improved capacities of CSOs working with vulnerable groups, children and adults with disabilities, those of Roma origin, people leaving with HIV/AIDS and others - increased public awareness about the EU-Moldova Association Agreement and EU visibility (Moldovan CSO respondent)

To my knowledge, EU cooperated with the legislators and lead CSOs that advocated positive legislative changes; we can say EU programming contributed to development of more enabling environment for civil society. The CS can enjoy less barriers in legal registration, access to information, budget support from local budgets (especially social service CSOs), participation in decision making at both national and regional levels. The voice of CSOs is better heard. (Ukrainian CSO respondent)

Survey respondents also offered fewer responses and results in terms of enhancing civil society involvement in policy cycles:

CSOs have reported a higher level of understanding and application of public Advocacy practice and influencing the policy making process. The CSO professionals has increased their skills in project proposal writing, transparency, accountability, policy formulation, monitoring and coalition development. (Moldovan CSO respondent)

Eastern Partnership Civil Society Forum is very positive example of civil society involvement in the policy sphere (Ukrainian CSO respondent)

*This is also visible in the **sample documentation**. In case of sample documents for targeted interventions, where a Final Report is available (21 out of 37 targeted intervention samples), grant beneficiaries report achievement of planned objectives. Across all 21 reports available, good and very good progress towards achievement of results has been reported. Results reported in Final Reports focus mostly on capacity development issues with some references to policy engagement and developing an enabling environment. Examples of reported results include:*

reduction of those factors which impeded journalists in fostering the public awareness on the governance decentralisation and democratisation process. (AM sample C)

Increased understanding of civil society participation methods, including implementation of national handbooks or guidelines on civil participation in decision-processes, among civil servants (AS-E)

[The project did] help social service-focused NGOs improve their practices (AS-G)

The implemented activities have promoted and developed capacity within the field of juvenile crime prevention among the project stakeholders. In short, the action has promoted local ownership of the current juvenile justice reforms by building cross-sectorial networks engaging community sports clubs, local government, schools and police on local and national level for jointly implementing and monitoring juvenile crime prevention initiatives. (GE-D)

A diverse range of results 'from organising public discussions on the draft concept on development of the civil society in Armenia, to intensive training campaign on Public Finance Management in Azerbaijan, to drafting "European Integration Communication and Information Strategy of Georgia 2013-2016" in Georgia, to

taking part in European Dialogue on Modernisation and providing advice on how to strengthen this policy initiative in Belarus, to initiating thematic debates to identify priorities in such domains as preventing and fighting corruption in Moldova, to providing information on the illegally amassed wealth by the key figures in the Ukrainian leadership during November and December of Euromaidan protests. (GE-E)

Increased CSO ability to meaningfully contribute to policy dialogue with local and state authorities in the probation system (GE-F)

Institutionalisation of social dialogue between education and science trade union and state authorities (GE-G)

Training programme on capacity-building of NGOs with emphasis on migration and development targeted regional organisation within 4 months (...) provided opportunity for NGOs to advance their objectives and influence migration process in a positive way, and to pursue common agendas at regional level. (GE-J)

local government agencies and local CSOs gained the skills of professional constructive cooperation; representatives of the target groups not only participated in projects activities by also assisted project members in organising trainings, informational campaigns, meeting of the family clubs; local CSOs gained new skills of working in eh networks; the number of Kherson organisations capable of influencing local policy, controlling tis implementation increased; each of the partner organisations improved their skills of working in partnership (UA-D)

Civil society organisations are able to work in a more conflict-sensitive way (UA-G)

Previous **thematic and country evaluations** confirm achievement of short- and mid-term results within targeted support concerning all key objectives, including capacity-building and engagement of civil society in policy cycles as well as creating a more enabling environment for civil society development. Results related to capacity-building are most commonly reported as those easier to manage and less vulnerable to external circumstances. Results related to engagement of civil society in policy cycle are also frequently reported, but often in terms of CSO participation in events, processes and institutions, less so in terms of influence and impact on decisions taken (see EQ4). Achievement of results related to creating a more enabling environment for civil society development is partial and problematic. While there are some cases of success reported, there are also cases where mixed or lower-than-expected results were achieved. The most commonly cited explanation for this is the key role played by national governments (see challenges and limitations below).

In the above-mentioned reports, cases of short- and mid-term results achieved within targeted support are usually reported jointly. The 2015 'Evaluation of the EU's co-operation with Georgia (2007-2013)' notes that: 'The role of EU supported CSOs in the "dialogue" before and after the October 2012 elections has been alluded to at several places: largely as a result of CSO involvement, politically driven election-law amendments were avoided and media coverage of the political campaign was enhanced. This marked a significant (and non-financial) EU contribution to the involvement of Civil Society in participative democratic development.' and that 'Civil Society has been involved in advising the Ministry of European and Euro-Atlantic Integration on its European communications strategy'. There is no common understanding of the results of increased EU involvement in policy processes, supported by the EU, as among all CSOs polled '8.1% judged that they had had zero policy impact, 69.7% judged that they had had minimal impact, 20.2% were able to identify at least some verifiable impact, and 2% felt that they had had strong impact.'

The report also notes that EU support resulted in increased CSO involvement in policy-making in the field of agriculture (ENPARD-supported work on Strategic Development Plan 2014-2018) as well as enhanced CSO capacity to engage in dialogue between refugee/IDP communities and the government.

The 2017 'Evaluation of the European Instrument for Democracy and Human Rights' notes that 'In a very fluid environment where the EIDHR works through civil society organisations, the assessment of EIDHR's results should be seen more in terms of contribution than in terms of direct and attributable effect.'

In view of this, results most commonly reported pertain to direct interventions where results can be measured instantly, like in the case of human rights defenders' support measures: 'The external evaluation pays notably tribute to the effectiveness and the responsiveness of the support to human rights defenders at risk under the EIDHR Emergency Fund and the grant to ProtectDefenders.eu, with each awarded grant potentially saving a life and/or allowing supported human rights defenders to continue

to work on democracy and human rights issues in their home countries.’ Other results are harder to measure and directly attribute, e.g. ‘It is also believed that the presence of observers on the ground contributes to reducing the possibility of election-related violence and tampering with results’.

The 2013 ‘Evaluation of the European Union’s Support to two European Neighbourhood Policy Regions (East and South)’ notes that EU programming achieved results notably in terms of ‘strengthening the capacity of Civil Society Organisations (CSOs) (...) through training, exchange of experience and networking, targeting in particular young people (directly or indirectly)’ with fewer results reported regarding enabling environment and involvement in policy cycles.

Furthermore, some previous evaluations indicate that EU targeted support for civil society in the field of policy dialogue is perceived as part of a wider portfolio of mechanisms including budget support and twinning, largely focuses on supporting government actors and their interaction with civil society rather than civil society organisations themselves (Evaluation of EU support to civil society in **Azerbaijan** in 2007-2013 and Evaluation of the EU’s Co-operation with Georgia 2007-2013).

Evidence of capacity-building in targeted interventions was found in documents across all modalities and across all major instruments including ENI/ENPI, EIDHR and DCI/CSO-LA (formerly NSA-LA) (further details – see EQ4).

What is more, evidence under this JC overlaps significantly with JC3.3a (policy engagement) as targeted interventions aim for and often result in enhanced policy engagement. In Belarus, the EU signed a funding contract in December 2017 to support Belarusian National Platform during 1.2.2018 – 30.1.2019 (12 months) – this is a targeted measure but has an impact on policy engagement.

The evidence from sample documentation and previous thematic and country evaluations broadly addresses all three expected outcomes (as per the Intervention Logic), with primary focus on ‘civil society contributing to strengthening democracy and convergence of political views’, with a secondary focus on ‘civil society contributing to policy dialogue between different stakeholders involving civil society, and a lesser focus on ‘Civil society contributing to gradual economic integration with EU market and inclusive economic growth’.

A 2010 evaluation of EU co-operation with Ukraine concluded that ‘The European Commission [in Ukraine] supported the development of CSOs, and their involvement in policy decision-making and implementation, through a series of small projects mainly targeting the provision of social services. Two larger projects effectively contributed respectively to strengthening cooperation between local authorities and CSOs for the delivery of social services, and to cooperation between CSOs and the relevant State Committee in the implementation of a consumer policy. But, for most CSOs, including those that have benefited from the Commission’s support, financial sustainability remains a major problem (also see EQ5). The same evaluation also confirms that the EU builds on outcomes of previous evaluations, and enhances the scope of engagement to cover previously concluded gaps such as grassroots organisations: ‘The NIP 2007-2010 underlined that top-down measures in support of democracy and human rights “should be accompanied by a bottom-up approach promoting citizens’ rights and public participation in the political, economic and social spheres leading to stronger participation by citizens in public life and in control of institutional bodies and law enforcement agencies and services, including at local level.” This was achieved in particular through the support given by the Commission to the development of CSOs.’

The 2015 evaluation of EU co-operation with Georgia concluded that ‘EU support strengthened Civil Society, leading to increased involvement with co-operation programme design, implementation and monitoring. The EU is a valued partner of Civil Society in Georgia and is credited with having created political and policy arena for NGOs to operate in. Instruments financing actions implemented by national NGOs included EIDHR, NSA-LA, CSF, IfS, and ENPI itself. Civil Society is still subject to limitations in Georgia – there are few groups with the capacity to monitor PFM, the relevant parliamentary committee is ineffective at monitoring the budget, etc. But there have been improvements. CSOs now regularly monitor prison conditions, and were supported in this by the EU using innovative means. CSOs were heavily involved in IDPs monitoring, in building better relations between IDPs and host communities, and in Confidence Building. The EU was the largest and most consistently engaged donor with Abkhazian Civil Society. While there is some discontent about governance, the Georgian National Platform of the Civil Society Forum is functional and has reached agreement with Parliament on how Civil Society can contribute to Parliament’s work. There is now a network of functioning second-tier NGOs outside Tbilisi capable of raising money in order to operate on a continuing basis. Where real gaps persist is at the grassroots level, where NGOs remain very weak. There has been

no trickle-down of resources to them as there has been to the second-tier NGOs. The situation is especially dire in minority regions, not coincidentally the areas in which the EU has been least successful in promoting European values.'

A country-level study conducted by a Belarusian CSO (OEEC) revealed that at least 30% of targeted support measures in the country across all modalities contain a capacity-building measure (EaP CSF Scoping Mission Report – Belarus, 2018), testifying to the EU's strategic approach to capacity-building of CSOs. Stakeholders in all field mission countries have also confirmed that capacity building is an area where EU targeted interventions achieve most of its intended results.

Armenia field mission interviewees including CSOs, EUD and government authorities noted the following positive effects of EU targeted engagement with civil society:

- Increased ability to engage in policy dialogue with national authorities – EU targeted support gave CSOs skills and knowledge necessary to pursue policy dialogue with national governments, feed into policy consultations and provide expertise to other actors
- Increased ability to manage projects and programmes – EU targeted support gave CSOs greater management expertise in managing budgets, processes, people and resources, which they then used in their non-EU funded activities
- Increased staff skills and competences – as per two points above, participation in EU targeted projects gave CSO staff greater skills to engage with their everyday work
- Increased financial management skills – interviewees frequently highlighted the complexity of EU financial management requirements, and noted that experience of managing EU funding allowed them to better manage their finances and run their own accountancy
- Some Armenian interviewees across all groups voiced critical remarks towards capacity-building activities focusing overtly on technical competences rather than constituency development.
- Belarus field mission interviewees including CSOs, EUD and government noted the following positive effects of EU targeted engagement with civil society in Belarus:
 - Development of CSO networks and strengthening of larger CSOs in receipt of EU funds – EU projects and programmes often require CSOs to build coalitions and co-operate with both civil society and non-civil society stakeholders, thus strengthening networks
 - Strengthening of tri-partite dialogue between the EU, government and civil society – EU projects usually involve incentives to dialogue and consultation with other stakeholders; CSOs in Belarus note that Belarusian government is more likely to listen to their concerns within EU-funded projects than through bilateral contacts (CSOs-government)
 - Strengthening dialogue between civil society and business and enterprises – due to restrictions on civil society activities in the country, co-operation with businesses and enterprises, seen as politically 'safe' activity has been strengthened with a good impact on co-operation between businesses and CSOs
 - Increased social and citizen awareness of issues pertinent to Belarusian society such as environment and gender equality – as above, a number of priority areas identified by the Belarusian government as politically 'safe' remain pertinent to Belarusian society and EU targeted interventions helped address as number of salient social problems

On the other hand, Belarusian interviewees noted limitations stemming from the modality of channeling funds through GONGOs, government and public authorities, notably the distance from local communities and independent civil society.

Ukraine field mission interviewees including CSOs, EUD and government noted positive effects of EU targeted engagement with civil society in Ukraine:

Development of CSO's sectoral/professional knowledge in the area supported by EU funding (e.g. environment, human rights) – a number of CSO interviewees noted that civil society in Ukraine need to develop professional skills and capacity in their sector of expertise, to be used both in providing services to client groups as well as to be used in advocacy and policy dialogue - EU targeted support is instrumental in gaining this

Developing CSO's generic management capacities including human resources, financial resources and project management – as it was the case in Belarus, CSOs report that experience of managing EU projects allows them to grow in-house capacities to manage projects, programmes, resources and people

Higher levels of involvement of civil society in policy-making, e.g. in community policing – CSO interviewees note that EU projects require active involvement of different stakeholder groups and thus contribute to greater CSO involvement in policy-making.

In terms of the **scope of engagement and stakeholders involved**, the EU has significantly enlarged the spectrum of actors, organisations and institutions involved in civil society engagement by means of targeted support over the course of the evaluation period (2007-2018), although the extent of this expansion has varied across the region. This process has accelerated significantly after 2012 further to the 'Roots of democracy and sustainable development' document as well as with the rolling out of 'first generation' Roadmaps in 2014 (although the cases of Azerbaijan and Belarus have shown different trends, as noted earlier).

An example of a success story from Moldova (Moldova Civil Society Fiche, CoTE, 2018) illustrates the prevalence of combined forms of engagement (targeted, policy and mainstreamed) - a project entitled 'Public money is my money' implemented by AGER (a CSO), focused on enhancement of capacities of local NGOs in monitoring public procurement and advocacy activities and increasing transparency of public procurement and increasing the degree of information about public funds' spending. The project collaborated with 10 local NGOs which benefitted from sub-granting to conduct monitoring of public procurement at local level. As such, it was **pertinent to all three forms of engagement**: as a grant it was a form of targeted support, as a form of involving CSOs in policy-making it was a form of policy engagement and as it strengthened the role of CSOs in public procurement it was also a form of mainstreaming. As a result of the project, Moldovan civil society organisations increased their capacities in monitoring public procurement, journalists enhanced their competencies in investigating misuse of public funds, thus strengthening the watchdog function of Moldovan civil society actors.

In a similar manner, enhancing Armenian civil society involvement in the policy dialogue was supported by the EU Delegation in Yerevan, one of the tools through which the establishment of structured dialogue between the Armenian National Platform (ANP) of EaP CSF and the Government of Armenia was encouraged (next to the CEPA EU-Armenia bilateral platform, see JC 3.2a). The ANP was launched on 7th June 2010 upon the initiative of Armenian civil society organisations. The National Platform is a country-wide network of more than 180 NGOs and serves several objectives – increasing the accountability of the government, increasing the diversity of voices heard, acting as a bridge between politicians and citizens and giving more visibility to the Neighbourhood East, thus being pertinent to all three forms of engagement.

The evaluation revealed a number of **hindrances to aggregate achievement of objectives** through targeted support. The first one has to do with external factors, notably geo-political environment and the actions of key local partners in Neighbourhood East (national governments). Their actions leading to restricted spaces for civil society and limiting the scope of EU engagement with civil society across all three forms of engagement.

The final evaluation of ENI CBC (2007-2013) notes that **unfavourable economic and geo-political environment** was a limiting factor in effective implementation of ENI CBC., in which CSOs are heavily engaged.

The mid-term evaluation of the European Neighbourhood Instrument (2014-2017) notes that 'since 2014, the global progress of Neighbourhood countries regarding EU fundamental values has been bleak in several countries, owing largely to the unfavourable political environment as the main cause' leading reported progress in EFI use differing greatly in terms of quality 'in each country and even across sectors within a single country'. This is reflected in EU programmatic documentation throughout the evaluation period, notably in documents that are regularly updated, such as Roadmaps, which provide a regular overview of limitations at national level.

This is most pronounced in **countries with restricted spaces for civil society**. The Belarus Roadmap 2018-2020 admits that 'the results of the implementation of "EU Roadmap for engagement with civil society 2014-2017" are modest too'. The evaluation of the EU co-operation with Georgia (2007-2013) notes that despite generally smooth implementation of EU programmes in the country, and Georgian government's co-operative attitude towards CSO participation in policy cycles, there were problems going beyond the remit of EU engagement yet limiting its efficiency: 'separately funded Civil Society oversight work was made well aware of [problems with Government of Georgia's social policy implementation] and consistently tried to exert pressure to ensure progress. In recent (post-2012) years there has been some progress in addressing these issues, yet problems remain as evidenced by 2014 technical monitoring reports'.

In **Azerbaijan**, the tightening of CSO-related legislation since 2014 has led to a severe decrease in the volume of targeted support. A final report for one of the sample projects in Azerbaijan describes the problems encountered at implementation level. The local Ministry of Justice refused to register an EIDHR project referring to 'civil society' citing concerns about anti-government activity. Eventually, this was addressed by changing the project's title from "Modelling new approaches to Civil Society development" to 'Meeting the Social Needs of Vulnerable Populations'. Later in the project cycle, changes in government administration led to further organisational setbacks in the project (AS-G).

Local interviewees in all field mission countries have also widely reported **lack of core funding (operational funding) modality** as an impediment to achievement of objectives. It is also reflected in some programming documents in Neighbourhood East. During the Armenia field mission, one CSO interviewee representing the EaP CSF National Platform singled out lack of operational funding as the biggest obstacle to achievement of results for EU engagement with civil society. In Belarus, two out of 13 CSOs interviewed indicate absence of core funding as an obstacle to achievement of long-term results and sustainability. During the field mission in Ukraine, 4 out of 24 CSOs interviewed noted that absence of core funding was an important limitation on EU programming and achievement of results. The 2014-2017 Roadmap for Georgia notes that CSO development is hampered by dependency on donor priorities and donor-dependent programming. This, in turn, has a negative impact on outreach and constituency work as CSOs respond to donor priorities first and to their communities second (if at all). Furthermore, the roadmap states high levels of staff rotation in CSOs and a revolving door between CSOs and government that lowers the overall capacity of the sector.

Although this finding could not be triangulated with any other findings under this EQ (also see EQ6 – sustainability), and DG NEAR closely monitors the issue (one DG NEAR interviewee stated that core funding support is 'high risk, [in terms of] transparency of institutional governance. Having projects and opening-up and assessing through certain criteria is much more transparent and leaves less questions of politicisation – project-based [approach] is politically safer'), it remains a perception on the ground and warrants noting.

Survey respondents noted the range of achievements that had been reached thanks to the funding provided under targeted support interventions – leading not only to strengthened capacity of the civil society organisations themselves, but also to tangible contributions to the communities and sectors that they serve. Examples include setting up and extension of provision of services to key target groups in the population, contribution to the development of new procedures, regulations, legislation in a range of spheres (e.g. domestic violence, youth employment, e-governance), development of social partnerships between civil society and local government, establishment of community centres, etc.

A key point made by several respondents is the need to highlight the support of civil society and its work at the local level, including in rural areas (a critique sometimes levelled at EU support within the survey responses is that it can focus too much on capital or major cities, and the national level of developments).

The effects seen include contributions to communities in areas affected by post-conflict situations. One Moldovan respondent noted, for instance: 'The support of the EU contributed to the improvement of the health of women on the two banks of the Dniester river, through bringing together professionals and beneficiaries from the two communities and fostering good relations.'

Field mission interviews did provide evidence of contribution to the increased capacity of civil society organisations and actors to perform their roles as independent development actors in Neighbourhood East. This, in turn allows civil society to contribute to strengthening democracy and policy dialogue between different stakeholders, as well as to develop prosperity and good neighbourly relations in EaP.

For example, during the Armenia field mission, 10 out of 18 interviewees (including CSOs, EUD, government, other civil society actors) stated that the EU's targeted support interventions had a significant impact on increased capacity of civil society organisations and actors to perform their roles as independent development actors in the Neighbourhood East, with minor reservations voiced as to the impact on grassroots actors. A survey respondent from Armenia noted: 'EU was crucial in offering support to young NGOs, capacity building and steering negotiations with government in passing legislation and mechanisms to support international standards.' As stated by another Armenian respondent, these positive results seen in the recent period contrast with earlier less positive outcomes of the EU approach, in their opinion, under which funding 'went to a large number of government affiliated and very weak organisations for work that they were not able and/or willing doing properly [while] simultaneously, independent organisations, particularly the ones which were critical to the government did not receive much-needed support. [this] contributed to the

government's capacity to marginalise and undermine the independent organisations.' This highlights the need to trace negative unintended outcomes and impact, alongside tracing of intended and positive results – and to adapt to such contexts effectively. The examples also indicate the nature of exogenous influences on the effectiveness of EU support.

During the Belarus field mission, only 5 out of 24 interviewees stated that the EU's targeted support interventions had had a significant impact on increased capacity of civil society organisations and actors to perform their roles as independent development actors in the country, with significant limitations noted due to the restricted government policy towards civil society. Most Belarusian survey respondents noted that the potential impact is in any case limited, in their view, as targeted support does not engage sufficiently with independent CSOs but has become increasingly directed at state-affiliated organisations, which do not have an incentive or goal to act as independent development actors.

During the Ukraine field mission, 11 out of 35 interviewees stated that the EU's targeted support interventions had had a significant impact on increased capacity of civil society organisations and actors to perform their roles as independent development actors in the Neighbourhood East, with notable reservations regarding the balance of capacity-development in geographical terms (Kyiv benefitting most, regions less, grassroots the least), and in terms of areas of capacity development. As one Kyiv-based CSO interviewee put it, 'there is an imbalance in impact: advocacy more developed for many CSOs than their policy engagement work and service provision'.

Many survey respondents referred to improvement in CSO capacity and in public awareness of the role of civil society in broad terms.

'State-independent entities and communities capable of somewhat changing situation were formed' (Belarusian CSO respondent)

'Main achievements are as follows: 1. CSOs are more confident - they have a financial support, so they are motivated to implement their projects. 2. The awareness of the general public is enhanced significantly. However, we still face problems in terms of youth policies. It would be better if EU supported new faces in CSO sector.' (Georgian CSO respondent)

'Sorry, I did not meet with key achievements of EU in this field. But unlike previous question I have some information why - Usually EU provides support through quit close circle of companies like ... with doubtful success for the local civil society, but successful reports to EU. Or some national "umbrellas", who quite successfully shut down local communities from EU support. On the other hand, the problem of "comfortable environment" around donors (partners with long term cooperation) is not unique for the EU' (Ukrainian CSO respondent).

Judgement Criterion 3.2: The effects achieved through the mainstreamed support to civil society have corresponded to the EU's initial objectives in Neighbourhood East.

Indicator 3.2a

Sectoral achievement of short-/mid-term results within mainstreamed support

Sample documentation revealed mainstreaming of civil society across majority of projects selected. 9 out of 12 mainstreaming sample projects include elements of civil society mainstreaming, albeit to a different degree.

One survey respondent from Armenia did note, however, that the involvement of civil society in consultation during the design and monitoring of budget support interventions tends to be rather formalistic.

One interviewed Armenian civil praised the important contribution of civil society organisations to a 'citizen budget' component (a form of participatory budgeting), whereby local CSOs acted as beneficiaries, helped develop capacity of the state partners and international CSOs provided technical expertise. The interviewee further stated that the component has become sustainable and that the Ministry now develops an annual citizen budget with a significant CSO input.

An ENPI project in Azerbaijan included a Grant Scheme for Civil Society Organisations and Social Partners (i.e. CSOs representing the private sector and workers and professional employees), where the latter were consulted in significant numbers through workshops and other means to complete project activities/outputs.

Several actions improved trust between partner governments and CSOs. This is not without tensions on all sides. Nevertheless, interviewees with CSO and EUD staff confirm a general impression of progress towards a better understanding among civil servants of the role of CSOs. In countries with particularly restrictive environments, this is often easiest in specific sectors where CSOs can demonstrate thematic capacity that is complementary to government and can contribute to government objectives. In other contexts, and particularly at the sub national level, civil servants and local elected representatives can value the ability of CSOs to mobilise additional funds to address local development projects.

An ENPI project in **Belarus** planned to 'target NGOs in order to facilitate shared understanding and solidarity required to resolve common problems and work towards community advancement'. The interim report stated that 'sense of ownership increased - not least because of building the trust between governmental and non-governmental project actors' and the final report noted 'increased knowledge and institutional capacity of central and local authorities and civil society in the field of sustainable development'.

Another ENPI project in **Ukraine** noted in the final report that the project involved 'a public representative and members of NGOs dealing with the IDPs were included in the composition of the commission' that was the main body deciding on support provided by the project. This was seen as having potential to contribute to future improved cooperation, as well as improving civil servants' willingness and ability to work with CSOs across a range of initiatives. As per CoTE CS Mainstreaming Note 2017, involvement of CSOs in decision-making is indeed the highest form of mainstreaming foreseen ('To partner', page 4)

The **field mission to Belarus** and comprehensive interviews with EUD staff across multiple areas of programming have revealed that mainstreamed support results can also be achieved within the limited scope of intervention in a country with limited space for civil society.

In an interview with a group of **EUD Belarus** programme managers covering different sectors where mainstreaming is expected to take place, all were able to provide examples of mainstreaming in programming and implementation. The manager covering regional development projects confirmed that strategic guidance for mainstreaming exists and is being actively used. The education and gender manager confirmed mainstreaming taking place in education, science, research and youth sectors

In an interview with a group of **EUD Belarus** programme managers, the manager covering regional development projects confirmed that civil society is a source of expertise in the sector, also perceived as such by the government. The education and gender manager mentioned a recently started VET modernisation project, the steering committee involves not only civil servants but also a diverse group of CSOs including social partners and sectoral specialists. The border management and mobility sector manager confirmed that CSOs are involved alongside the authorities in border management and labour migration projects, including on a project combining businesses and NGOs. In the social protection and social work sectors, EUD staff programme managers suggested that there is only limited area for CSO input, as the government feels able to carry out all essential services and remains suspicious of CSO input. However, in the medical sector, NGOs are very active, according to the sector manager. The interviewee further stated that 'local authorities feel 'territorial' about EU programming, not eager to let CSOs in'. The sustainability and energy sector manager noted that civil society is involved in both areas and that projects involving local authorities and NGOs are the norm. A recent energy efficiency call launched by the EUD will also involve CSOs. EUD staff noted that CSOs often have the best knowledge of how to implement projects in Belarus but that, on projects touching issues perceived as political, CSO input is not welcome.

Indicator 3.2b

Extent to which the EU strategic approach and related guidelines and tools to deal with CS mainstreaming were appropriate.

The evaluation revealed that mainstreaming guidelines and tools are used comprehensively throughout all countries of the region as well as through all sectors under evaluation, as per country priorities of the EU for Neighbourhood East (see IR).

Interviews with **Brussels-based and EUD stakeholders** confirmed that guidelines and tools developed by CoTE Civil Society are in use by DG NEAR in programming and by EUDs in programming (most commonly) and implementation (less often). The guidelines provided clearly outline the motivation behind mainstreaming, the key actors involved and the modes of involvement (mainstreaming), but do not provide clear guidance on monitoring and evaluation of mainstreaming and on the intended results of the process.

Interviews with EU Delegations in the region have further confirmed that CoTE Civil Society guidelines are being used in programming and implementation, but interviewees also noted that this the mainstreaming of civil society approach is mostly promoted by staff responsible for civil society matters, and that there is less ownership in other sectors. EUDs also noted that civil society mainstreaming differs from other mainstreamed issues (e.g. gender, environment, human rights) in that it is not embedded in all programming documents as a cross-cutting issue and is also not included in reporting documents and checklists. Some EUD staff also noted that the notion of civil society mainstreaming has to be taken up more comprehensively as a strategic dimension at all levels, including the European Commission and is not only a matter of guidelines and implementation but an entire mind set of embedding civil society across all areas of programming and policy.

The strategic guidelines and tools available are most appropriate for planning stages, with clear references to EU priorities and mainstreaming across most of the mainstreaming sample. The evaluation could reveal no evidence of a strategic approach at implementation, with different standards applied and outputs produced. What is more, the evaluation could not find evidence of any guidelines or a strategic approach to monitoring and evaluation of mainstreaming. Record-keeping and knowledge management is an important part of monitoring and evaluation and there was no evidence of a strategic approach to it at any level or evaluation unit.

According to one recent study, Moldova is one of the countries where the EU has been most successful in integrating civil society around sector budget support. It is interesting to note that “the EUD in Kishinev has never attempted to make democratic accountability the main focus of budget support, recognising that the government of Europe’s poorest country faces multiple fiscal constraints. The more successful approach taken has been the ‘mainstreaming’ of democratic accountability by including some component of accountability in each action, and ensuring that this is integrated in the implementation strategy and indicators, not just in the rationale and needs analysis.”³²⁹

Judgement Criterion 3.3: The effects achieved through policy-level engagement with civil society have corresponded to the EU's initial objectives in Neighbourhood East.

Indicator 3.3a

Aggregate achievement of short-/mid-term results within policy-level engagement

The effects achieved through policy-level engagement with civil society have very closely corresponded to the EU's initial objectives in the Neighbourhood East, both in terms of policy-level engagement with CS, forming a regular and strategic partnership on matters pertinent to civil society in the region, but also in terms of promoting civil society's engagement with and participation in domestic policies. As noted in JC3.1a there is a significant overlap between evidence under JC3.1a and this JC, due to the strong linkages between targeted interventions and policy engagement activities in many areas.

In the first area of policy-level engagement, there is ample evidence of the EU's increased and systematic dialogue with civil society on policy matters across the region. Wherever possible, EU (and local EUDs) invested significant efforts in policy engagement with CS across the region (to lesser extent in countries with restricted spaces - Belarus and Azerbaijan – however, the analysis shows that the EU engages to the extent possible considering the circumstances).

The main achievement at regional level is the establishment in 2008 of a permanent forum for policy engagement in the Neighbourhood East - the Eastern Partnership Civil Society Forum and its National Platforms (also see EQ1). Even though the Forum itself is funded as a targeted intervention, it provides valuable inputs into policy at European level (participating in Eastern Partnership Working Groups and high-profile events), regional level (EaP CSF Annual Assembly) and national level through its National Platforms. Although field mission interviews revealed a mixed reception of the Forum and National Platforms among stakeholders, there is a shared

³²⁹ DEVCO Supporting Democracy Facility (2017) “Draft Compendium of success stories in EU support to democratic accountability.”

understanding among wider civil society actors including CSOs, think tanks, media and trade unions that EaP CSF and NPs are the widest consultation forum in the civil society sphere at national and regional level. There is no shared understanding as to the extent to which the Forum and NPs are representative of the whole civil society sector and as to its efficiency as an organisation, considering the resources at its disposal. The evaluation of EU co-operation with Georgia (2007-2013) notes that 'The existence of the [EaP CSF] National Platform was universally saluted by NGO representatives interviewed during the field phase, although some concerns were expressed about its governance structure, to such an extent that one prominent Civil Society representative expressed doubt that the Memorandum of Understanding signed with Parliament really represented the position of the Platform as a whole. Another was of the view that the Platform was aligned mostly with the Association Agreement rather than the needs of Georgian Civil Society.'

There is also some dissatisfaction with the governance of the EaP Civil Society Forum bringing together the various National Platforms. One NGO representative interviewed spoke of the need for better connection of National Platforms to the Civil Society Forum and improved communication with EU structures. A number of interviewees in Armenia, Belarus and Ukraine noted that although the Forum and its National Platforms are the largest such bodies in the respective countries, they are not representative of the entire civil society sector.

There are significant achievements in policy engagement at bilateral level, notably those related to the Association Agreements and DCFTAs. Each AA/DCFTA agreement is accompanied with measures for enhanced bilateral dialogue with civil society, notably through the EU-Georgia, EU-Moldova and EU-Ukraine civil society platforms. They bring a new quality to the dialogue with wider civil society as they require participation of employer and employee organisations including business associations and trade unions. Interviewees involved in the process of creating such platforms in Ukraine and Georgia report that this format needs time to be fully operational (both platforms are still in the process of setting up and consolidating). An interviewee involved with the EU-Georgia platform reported that full trade union participation was only assured in the third year of the platform's operations. Interviewees involved in the EU-Armenia (CEPA) civil society platform consultations noted that local civil society stakeholders had no experience with a format involving employers and employees (see below also for national limitations) and that achievement of objectives is thus likely to take longer.

Assessment of policy engagement in AA/DCFTA/CEPA-related processes is impeded by the lack of consolidated data on civil society engagement within sectoral programmes, notably in the field of trade and economic integration. An EaP CSF report 'EU-Georgia Civil Society Platforms – Lessons Learnt' (2017) notes that although 'transparency level of civil participation and the association process has generally increased, [...] there are significant challenges associated with the involvement of CSOs in the process' and that 'information is quite fragmented, which does not provide valid and representative data for the assessment of civic engagement'.

In countries without close/bilateral agreements with the EU (AA/DCFTA/CEPA), platforms for policy engagement are limited, but in both Azerbaijan and Belarus EaP CSF National Platforms remain in operation, although with severe limitations in the case of the former, with the EaP CSF and DG NEAR currently looking for a viable solution allowing to fund and operate the Azerbaijani NP. In both countries, the EU worked towards achievement of its policy engagement objectives using other means, notably involving CSOs in its Human Rights Dialogues held in Brussels as well as ad hoc consultations on matters of bilateral relations.

The other area of achievement in policy dialogue pertains to involvement of civil society in domestic (national level) policy. The formats of this involvement differ greatly from country to country in the region, and as noted above some of them are tied closely to targeted support (the more significant EU targeted support is, the more significant is CSO involvement in national policy). Furthermore, the efficiency of dialogue pursued at national level leaves CSOs exposed to national governments and the enabling environment for civil society at national level. In all field mission countries, all stakeholders reported that EU's policy engagement policy is more advanced and relevant (see EQ1) to civil society needs (than that of national governments) and has greater efficiency than national policy engagement processes involving civil society.

In Georgia, as the EaP CSF report on 'Adopting Georgian and Moldovan experiences in bilateral platforms to Armenia' notes 'since CSO involvement is directly prescribed by the Association Agreement [EU-Georgia], in most cases CSOs have to urge the authorities to express their readiness to hold consultations on various issues. However, there are cases when, in spite of intensive consultations and meetings, CSOs have been unable to influence the steps taken by the authorities.'

In the case of EU-funded reform of the Prosecutor's Office of Georgia – local CSOs reported that ‘although a number of workshops were held between the Government and the non-government sector in the process, the former did not take into consideration many essential issues. Despite a high level of participation, civil society assesses the current legislative amendments in a negative light, illustrating the problem with incorporating feedback received during consultations. As some CSO interviewees observed, participation and consultation does not equal impact. Along with the current challenges, problems exist within civil society and hinder its effectiveness. The most evident challenges are a lack of adequate knowledge and qualifications. As it was deduced by desk research and interviews with experts, only few CSOs have the capability to work steadily at a high level; in most cases, civil society lacks the resources necessary for sustainable and active work.’ This is telling of another problem with policy engagement revealed in interviews and evaluation documents – the CSOs insufficient capacity to engage in domestic policy and absence of support at national level (e.g. financial resources), hampering the achievement of objectives (also see EESC below).

The EaP CS Facility Country Fiche for Moldova notes that the EU puts policy-level dialogue and partnership between civil society and the Moldovan government high on its agenda. This is operationalised by local EUD's work on including CSOs in policy formulation, implementation and monitoring and support activities and involving CSOs in implementation of the Association Agreement through shadow reports and public statements. CSOs also deliver significant results through targeted support with tangible outputs for local communities including in social services and inclusion.

The evaluation report of EU's co-operation with Georgia (2007-2013) identifies a number of achievement in civil society's domestic policy engagement in several areas: ‘Among the non-financial instruments for EU support is structured dialogue with Civil Society; (...) the Rule of Law Roundtable established by the EU Delegation in 2008, and the Election Technical Working Group co-chaired by the EU Delegation and UNDP since 2008’, noting that permanent structures set up with EU assistance have a potential to generate lasting results at local level.

Civil Society Roadmaps for 2018-2020 all note considerable progress in all areas of policy engagement across all countries where updated roadmaps have been prepared/released (Armenia, Belarus, Georgia).

There are several other platforms for policy engagement of CSOs in Neighbourhood East that remain outside the remit of the European Commission yet provide significant opportunities for policy dialogue for CSOs in the region. The European Economic and Social Committee is involved in bilateral CSO platforms (AA/DCFTA/CEPA) and regularly engages with CSOs in the region, mostly on matters of labour legislation and trade. An EESC interview noted that, although the EU is keen to support its side of the dialogue, and that creation of such platforms is a tangible and sustainable achievement, this needs to be complemented by national support - lack of financial support for the EaP components of bilateral platforms hampers the achievement of results.

The European Parliament provides opportunities for Neighbourhood East CSOs to engage in policy dialogue. The main forums for this are the Foreign Affairs Committee (AFET) and the EU-EaP parliamentary assembly (EURONEST). CSOs are regularly consulted as part of EURONEST committee work, notably the Social Affairs, Employment, Education, Culture and Civil Society that has met 19 times since 2011. All meetings involve CSO representatives from the region. A European Parliament interviewee confirmed that, although CSO involvement is regular, it is not structured or regulated and has not been evaluated. In addition to EURONEST's work, CSOs also contact individual MEPs as well as AFET members as those most involved in foreign policy, and European Parliament delegations visiting the region always hold meetings with CSOs. AFET missions in the region usually start with meetings with CSOs and journalists, providing inputs on country situation, including civil society and human rights. Parliamentary reports, one of the main tools used by AFET in foreign policy work, always include contributions from CSOs from the region(s) concerned. Another European Parliament interviewee highlighted the fact that in the absence of specific guidelines for EP engagement with civil society, notably at highest levels (EP President), policy-level engagement strongly depends on the capacity of individuals (e.g. EP President's advisors) and CSOs own capacity to navigate EU institutions and the ability to proactively engage with relevant individuals and institutions within the Parliament.

The survey findings resonate with the preceding analysis. While the pattern varies across the EaP, in reflection of the national contexts within with the EU works with civil society and governmental stakeholders, in those countries where policy-engagement activities have been increasingly used, stakeholders noted the strong contribution that such activities have brought.

EQ4 (Impact): To what extent have the EU's various forms of engagement with Civil Society in the Neighbourhood East region contributed to the enhancement of participatory and inclusive democratic governance?

Judgement Criterion 4.1: EU's engagement with civil society has contributed to the increased capacity of civil society organisations and actors to perform their roles as independent development actors in Neighbourhood East.

Indicator 4.1a	Aggregate achievement of long-term results delivered through targeted support
	<p>Substantial evidence has been collected relating to increased capacity of civil society, which can be considered as one among the outcomes of targeted support, and as an element creating favourable preconditions for reaching the outcomes and impact identified in the RIL.</p> <p>Narrative final reports provide evidence about preconditions for long-term impact, mostly by reference to successes in capacity strengthening. In the Azerbaijan targeted sample documentation, only one project reports on positive long-term impact mostly in terms of stronger capacity of the beneficiary and partners to deliver services. Similarly, in the Georgia targeted sample documentation, six out of seven projects with Final Reports available refer to long-term results, all of those combining elements of increased CSO capacity to perform their roles as independent development actors and promotion of structured participation of CSOs and civil society actors in domestic policies, in EU programming cycles and internationally. In the Ukraine targeted sample documentation (4 out of 8 projects with Final Reports available), 2 out of 4 FRs refer to long-term impact, mostly in terms of activities and outputs, including 1) stronger capacity to deliver services and 2) stronger advocacy capacity.</p> <p>Conversely, in the Belarus targeted sample documentation, reports for four out of eight Final Reports express doubts regarding the long-term impact of the actions, mostly attributed to limitations on civil society operations, including restrictions on trade unions, imposed by the government of Belarus.</p> <p>Brussels-based EEAS and DG NEAR interviewees shared a common perception that EU engagement has had a significant impact in helping CSOs play their role as watchdogs/monitoring functions, allowing them to contribute to policy dialogue between different stakeholders.</p> <p>EU support to civil society in the countries covered by this evaluation plays a significant role in EU efforts to address preconditions for economic integration such as reducing the worst forms of child labour, eliminating forced labour, and the fight against human trafficking. These issues are discussed in more detail in [sections relating to responsiveness to local priorities, CSO engagement in domestic policies, and complementarity of modalities.]</p> <p>Impact has been identified in a number of evaluation reports and sectoral studies. For example, according to one recent study of EU global support for CSO capacity development, in Georgia, financial and technical support from the European Neighbourhood Programme for Agriculture and Rural Development (ENPARD) has contributed to the establishment of an increasing number of agriculture cooperatives, which has had long-term impact. "Cooperation grew amongst small farmers and the programme facilitated better access to information and expertise through agriculture communication and information call centres. In this way, new relationships emerged between civil society actors as a result of organising together and speaking with one voice to lobby for smallholder farmer interests."³³⁰</p>

³³⁰ EU (DEVCO.A.5 CSO Roadmap Facility) (2016) EU Support to Capacity Development of Civil Society Organisations

Indicator 4.1b	Aggregate achievement of long-term results delivered through mainstreamed support
<p>During the Armenia field mission, two interviewees stated that the absence of consolidated impact assessment of mainstreamed support makes the assessment of long-term results difficult for their organisations. Local EUD confirmed that mainstreaming is not a distinct category in reporting making monitoring and consolidated assessment more complicated.</p> <p>During the Belarus field mission, one interviewee referred to long-term results of mainstreamed support in developing CSO capacities as independent actors, confirming that mainstreaming, wherever it occurs, does have an impact but the number of sectors of EU operation in which mainstreaming has been considered in Belarus is low. Furthermore, the interviewee noted that many projects are implemented by or with government counterparts or GONGOs, limiting the inputs of independent civil society and thus limiting impact on it. One interviewee also noted absence of data and insight, also quoting the difficulties encountered in the country due to restricted spaces for civil society.</p> <p>During the Ukraine field mission, one interviewee referred to long-term results of mainstreamed support in developing CSO capacities as independent actors, stating that this is a novelty element for most CSOs in Ukraine and that impact assessment is a matter of time.</p> <p>EUD Georgia also confirmed that mainstreaming forms part of a wider portfolio of engagement with civil society, and that mainstreaming of civil society organisations helps the EU and EUD better understand social needs and needs of CSO constituents; this validates CSOs role as aggregators of constituency opinions and needs, in turn making them stronger and making them better at what they do with their members and constituents.</p> <p>No specific evidence of long-term results in terms of increased capacity of civil society organisations and actors could be identified in the mainstreaming sample documentation.</p> <p>One Armenian CSO respondent stated that 'Probably the major tool that is not used in its full potential by the EU is the monitoring capacity of the civil society in the region. This relates particularly to the monitoring of the activities implemented by the Governments of the EaP countries with the financial support of the EU'.]</p> <p>In terms of increased capacity, long-term effects of mainstreamed support are similar to that for targeted support. In the 'Support to Local Development in the Republic of Belarus - Part 2 (Extension to Grodno and Minsk Oblasts)' project, the results show that, CSOs in Belarus are more comprehensively involved in local development, and a number of CSOs developed their capacity to provide expertise and services to other actors including local authorities and international organisations.</p>	
Indicator 4.1c	Aggregate achievement of long-term results delivered through policy-level engagement
<p>Field missions in Armenia, Belarus and Ukraine revealed significant long-term results in terms of increasing CSO capacities to act as independent actors, delivered through policy-level engagement.</p> <p>The Armenia Roadmap 2014-2017 notes that 'Armenian civil society involvement in the policy dialogue was supported by the EU Delegation and the establishment of the structured dialogue between the Armenian National Platform (ANP) of the Eastern Partnership Civil Society Forum (EaP CSF) and the Government of Armenia was encouraged. The Armenian National Platform of the EaP Civil Society was launched on 7th June 2010 upon the initiative of Armenian civil society organisations. The National Platform is a country-wide network of more than 180 NGOs. The Armenian National Platform has the potential to serve several objectives – increasing the accountability of the government, increasing the diversity of voices heard, acting as a bridge between politicians and citizens and giving more visibility to the Eastern Partnership'. Evidence from the Armenia field mission reveals that the National Platform resulted in increased consultation in many areas, but also that some members of the platform do not identify with European policies and values and use it as a way to increase their profile and visibility towards their constituents and the public.</p>	

In countries like Azerbaijan or Belarus, the EU's policy engagement is less visible while most support to civil society happens through support to regional events or international organisations (which then cooperate with civil society), e.g. through UNDP in Belarus and Azerbaijan. Interviewees at a Brussels-based donor organisation reported that the EUD in Baku often invites GONGOs and government-aligned CSOs to the same consultations as independent CSOs thus limiting their opportunity to speak freely and without fear of retribution. In Belarus, projects implemented by UNDP and with considerable inputs from governmental institutions do not seek active and independent civil society contributions through consultations, even if nominally many of them do include opportunities for dialogue.

Survey respondents list the following long-term results and challenges of policy-level engagement:

- 'Mixed, some dialogue taking place but effects of it are not clear. There is a need to simplify the language and amplify outreach.' (Moldova CSO respondent)
- 'Sorry, I did not meet with key achievements of EU in this field, just attempts. Sometimes good attempts, but I'm not sure that at this stage they can be defined as achievements.' (Ukraine CSO respondent)
- 'Very important, but few achievements. Not enough policy dialogue across all areas.' (Ukraine CSO respondent)
- 'The EU support in the policy-level engagement was particularly unsatisfactory since quite a number of quite weak and "servicing" think tanks were getting continuous support whereas, in the situation of clear lack of public policy capacity in the civil society, the EU did not do much to support new independent think tanks or experts/researchers. As a positive, I can mention the fact that while not funding the independent policy experts/orgs, the EU still provided a platform to present and advocate the work of such independent civil society policy products. This particularly was true of the human rights and justice policy proposals, anti-corruption policy proposals, GSP+.' (Armenia CSO respondent)

Most of the responses provided focus on short- and mid-term results rather than long-term impact, with little insight into long-term results and lasting achievements of policy-level engagement.

Judgement Criterion 4.2: EU's engagement with civil society has contributed to the promotion of conducive environments for CSOs and broader civil society actors in Neighbourhood East.

Indicator 4.2a

Aggregate achievement of long-term results delivered through targeted support

Documentary review and field mission interviews identified evidence of long-term impact on the enabling environment, across only four countries in the region (Armenia, Georgia, Moldova and Ukraine). However, these must be interpreted against a greater number of elements of evidence suggesting that change is extremely fragile.

The achievement of long-term results in terms of promotion of conducive environments heavily depends on external factors. Achievement of results is limited in countries with limited spaces for civil society. In some cases, external factors such as government restrictions on independent civil society severely reduce impact of EU engagement in promotion of conducive environments. Problems with external intervention (mostly government) are noted across all countries. Interviewees in all three field mission countries most frequently named the following: political factors (deterioration in democratic governance and political stability – Armenia, Belarus, Ukraine); military and geo-political factors (war in Eastern Ukraine, tensions with Azerbaijan in Armenia); legislative and institutional factors (low capacity of public administration, slow pace of reform, all three countries); economic factors (economic crisis, all three countries). The limitations listed above are particularly acute in the context of limited spaces for civil society. The 2016 'Evaluation of EU support to civil society in **Azerbaijan** in 2007-2013' notes that increased government intervention in civil society has led to interruption of projects and suspension or closing of CSOs. This was particularly acute for CSOs working in the field of human rights and media. During the **Belarus field mission**, two interviewees noted that, although the EU's engagement with civil society has contributed to the promotion of a slightly more

conducive environment for CSOs and broader civil society actors in the country, any progress is vulnerable to government intervention and that it can be rolled back instantly.

Although an overwhelming majority of **interviewees** (including CSOs, EUDs, public bodies, donors and other civil society actors) during field missions agreed that EU targeted support is of great help to civil society and has long-term results (described in general terms and often not specified), only a small proportion of interviewees expressed the opinion that there has been long term positive impact on the enabling environments.

- During the **Armenia field mission**, four interviewees noted that EU's engagement with civil society has contributed to the promotion of conducive environments for CSOs and broader civil society actors in the country, including stimulating a debate on long-term funding for CSOs at national level through charitable donations, tax deductions and national-level grant provision independent of donor support.
- During the **Belarus field mission**, two interviewees noted that, although the EU's engagement with civil society has contributed to the promotion of a slightly more conducive environment for CSOs and broader civil society actors in the country, any progress is vulnerable to government intervention and that it can be rolled back instantly.
- During the **Ukraine field mission**, one interviewee referred to long-term impact of targeted support in this area, notably to the fact that thanks to EU targeted support for civil society consultation models and awareness raising, public consultations are now increasingly the norm for Ukrainian government organisations, and that in most new reform initiatives contributions are sought from a wide range of civil society actors in line with EU practice in the field.
- One survey respondent from **Moldova** noted how EU support had contributed to what s/he considered "positive developments in the relations between civil society communities on both sides of the Dniester river which had prompted active dialogue between civil society and the president in Transnistria." This is significant, given that Transnistria has followed the pattern seen in Russia of shrinking the space for civil society, in general.

The Evaluation of EU support for Civil Society in **Ukraine** 2007-2015 (unpublished) notes that 'EC [targeted] support to civil society [in Ukraine] has largely been successful in improving the cooperation between CSOs and local authorities, both directly and indirectly. CSOs recognise that positive, sustainable change is only possible with cooperation between civil society and state institutions – whether at the local level or in terms of promoting Ukraine citizens' interests in the region. CSOs also found, through the support given by the EU that their work is made easier by engagement with state authorities. Results varied according to the project area, the activities and the enabling environment (...) A significant majority (70%) of CSO respondents noted 'great' or 'substantial' involvement at the local level, reflected by nearly the same level of involvement at the regional and national level. Only 13% have declared an absence of cooperation between the CSO and public authorities at the national level and only 5% at the local level.'

However, only one Belarus interviewee -- representing a public body – expressed an opinion that the 'quality of CSO work deteriorates' and that the government must therefore actively intervene.

Indicator 4.2b	Aggregate achievement of long-term results delivered through mainstreamed support
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No evidence of long-term results delivered through mainstreamed support could be observed in the available documentation and field missions.

Field mission interviewees across all three countries noted that mainstream support has only indirect impact on supporting the development of a conducive environment. EUD interviewees based in the region also stated that mainstreaming's impact on enabling environment is limited by political factors. In some sectors, where there is ample CSO expertise (e.g. environment in Georgia and Armenia), mainstreaming reinforces other dimensions of EU engagement including policy dialogues and contributes to a more enabling environment for CSOs, albeit indirectly.

No evidence of long-term results in terms of promoting conducive environment for CSOs could be identified in the **mainstreaming sample documentation**.

Evaluation-level evidence **conflates results of mainstreamed support** in terms of CSO capacity to act as independent actors with promotion of conducive environments for CSOs and broader CSO actors in the Eastern Partnership as well as promotion of structured participation of CSOs and civil society actors in domestic policies (see JC4.1a).

Indicator 4.2c

Aggregate achievement of long-term results delivered through policy-level engagement

One interviewee in Belarus noted that policy-level engagement helps to address human rights violations and contributed to a better environment for CSOs, but it is still very vulnerable to government restrictions.

One interviewee in Belarus noted that policy-level engagement helps to address human rights violations and contributed to a better environment for CSOs, but it is still very vulnerable to government restrictions.

Evaluation-level evidence frequently **conflates results of policy-level engagement** in terms of CSO capacity to act as independent actors, promotion of conducive environments for CSOs and promotion of structured participation of CSOs and civil society actors in domestic policies with that of mainstreamed support (see JC4.1a and JC4.1c).

Judgement Criterion 4.3: EU's engagement with civil society has contributed to the promotion of structured participation of CSOs and civil society actors in domestic policies, in EU programming cycles and internationally in Neighbourhood East.

Indicator 4.3a

Aggregate achievement of long-term results delivered through targeted support

Interview evidence, including interviews with CSOs and public stakeholders across Eastern Partnership confirms that EU's engagement with civil society delivered through targeted support has contributed to the promotion of structured participation of CSOs and civil society actors in domestic policies, as well as in EU programming cycles and internationally in EaP.

CSO survey respondents from the region frequently reflected upon the ways in which the support they have received from the EU has equipped them as individual actors and as organisations to be involved in the policy sphere and make a contribution to policy-making. It was also noted in several cases that CSOs have been able to be more active in discussing EU programming – e.g. inputting into the discussion of Roadmaps in Armenia, Georgia and Ukraine.

There are differences across all countries of the region (except Belarus, due to a different, more centralised nature of local governance, and absence of local self-government) between central and local authorities' approach to co-operation with and within EU projects and how targeted support contributes to promotion of structured participation of CSOs and civil society actors in domestic policies. Central governments are able to more systematically establish and apply consultation mechanisms with CSOs and civil society actors as a result of EU targeted support, whilst local governments are less capable of doing so.

Document review, including the targeted sample and stakeholder interviews indicate that the EU contribution to the promotion of structured participation of CSOs and civil society actors in EU programming cycles was probably the most visible change over the reference period for this evaluation.

Indicator 4.3b	Aggregate achievement of long-term results delivered through mainstreamed support
<p>Most field mission interviewees suggested – in general terms -- that the EU's support resulted in a positive change of local practice regarding policy engagement.</p> <p>EUD interviewees in Armenia and Georgia further highlighted that results of mainstreaming in promoting structured CSO participation depends on local capacity in a given sector. For example in Armenia, lack of CSO expertise in poverty reduction and equality limits the contribution to programming and does not lead to increased structured participation of CSOs. In Georgia, there are only two CSOs with relevant expertise in road safety and this limits the scope of consultations. On the other hand, there are several experienced CSOs in the field of environment in Georgia, and in the environmental projects they often sit on steering committees as they can provide relevant inputs.</p> <p>National authorities in the Eastern Partnership countries are less open towards CSO engagement in policy processes and in the absence of EU engagement in the field are less likely to engage with CSOs on a regular basis. This is illustrated in the evaluation of the EU cooperation with Georgia 2007-2013: 'Technical ministries, especially the MoF, remain distrustful of NGOs' technical competence to comment on areas such as PFM reform, but two qualifications are in order. First, during the field phase it was reported that such resistance is diminishing. Second, as discussed in answering EQ 2, the nature of the PFM reform itself, which is more a bundle of function-oriented technical fixes rather than an "overarching reform" (as the phrase is used in PFM), acts to weaken the ability of Civil Society either to contribute to strategy setting or to monitor implementation.'</p> <p>The survey findings give insights into ways in which EU support to civil society in interventions relating to a range of sectors (e.g. economic development and trade) has facilitated active participation of these stakeholders in broader policy developments – including discussions between their countries and the EU over Association Agreement and DCFTA processes. As an example of impact in a specific sector, a Moldovan respondent noted how EU support to civil society in engaging with policy development in the sphere of domestic violence had led to civil society being able to play an active and full role in this process, leading to positive changes in the legislation. The respondent highlighted the importance of conditionality placed by the EU, linking the need for a law on domestic violence to be introduced in order for Moldova to receive budget support from the EU.</p>	
Indicator 4.3c	Aggregate achievement of long-term results delivered through policy-level engagement
<p>Most field mission interviewees suggested – in very general terms -- that the EU's support resulted in a positive change of local practice regarding policy engagement. However, CSO interviewees were usually less positive than EU staff in their assessment and more frequently point to local obstacles in long-term result achievement.</p> <p>The EaP CSF (2017) report on adopting experiences of bilateral policy engagement platforms from Georgia and Moldova to Armenia provides a very negative assessment of the long-term results in policy-level engagement.</p> <p>In Moldova, the monitoring report suggests that government-civil society co-operation is 'perfunctory' and that consultations with civil society do not translate into impact and decision-making. The report notes that many CSO inputs are ignored by the government of Moldova and that sometimes the legislative proposals consulted with civil society actually attempt to limit its freedoms and involvement in policy. The report also notes that governments resort to intimidation of CSOs to discourage their inputs.</p> <p>In Georgia, the report notes that the EaP CSF national platform actively contributed to the Association Agreement Action Plan and that its recommendations were – for most part – accepted by the government of Georgia. The evidence collected in by the report suggests that this level of CSO-government co-operation is an exception in the region.</p> <p>The survey findings provide examples of positive achievements that serve as evidence of impact. An Armenian respondent noted, for instance: 'Through EU support our organisations have developed and advocated for various public policies including policies on preventing gender-biased sex selection, migration, social and economic</p>	

development, promoting gender equality, preventing GBV, strengthening local democracy and local governments reforms. Most of these efforts were much successful and very effective.' A Ukrainian respondent to the online survey noted: 'the EU position was used as one of the advocacy/lobbying tools of the reform-minded NGOs. It helped a lot, esp. in adopting crucial legislation.' Another Ukrainian respondent noted the impact gained through the EU's support for policy engagement activities: 'Quite effective EU support for the civil society coalition Reanimation Package of Reforms in Ukraine (2016-2018) that serves as intermediary for dialogue between civil society and the government including executives and Members of the [Ukrainian] Parliament.'

EQ5 (Sustainability and Ownership): To what extent have the changes to which EU support have contributed proved to be sustainable after the end of EU funding?

Judgement Criterion 5.1: The results achieved through the EU's support and engagement with civil society allow the beneficiary organisations and actors to continue to operate as effective actors in the civic and governance realms.

Indicator 5.1a	Extent to which the capacities developed under EU support are sustained.
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The EU support to civil society has been directed towards the development of capacities of CSOs, engagement in policy dialogue and creating an enabling environment for civil society. These areas are recognised as key EU commitments laid out in the 2012 Communication 'Roots of Democracy and Sustainable Development: Europe's engagement with Civil Society in external relations'. The EU engagement with civil society has brought results in capacity-development, policy engagement and (to a lesser degree), the enabling environment. This is particularly important in relation to the level of operational and institutional capacities of organisations as well as their advocacy and human rights defender capacities. A review of the USAID/CIVICUS CSO Sustainability Index for the Neighbourhood East region shows an increase in CSO capacities in **Armenia and Moldova**, and that **Ukraine** reported advances in organisational capacity, including in the development of missions and strategic plans, internal management systems, constituency building, staffing, and technical capacities.

With regard to advocacy capacities in other countries, positive shifts have been recorded in **Armenia, Belarus, Georgia, and Moldova** between 2008 and 2017 (USAID (2018): The 2017 CSO Sustainability Index for Central and Eastern Europe and Eurasia). However, in all countries, the organisational capacity of CSOs continues to vary widely and depends on and is threatened by political and legislative constraints.

Neighbourhood East governments continue to declare their commitment to engage with civil society in policymaking. For example, the 2017 EaP Summit Declaration³³¹ – endorsed by all EU and EaP governments – shows general consensus on the role of civil society as promoting better governance. However, at the same time restrictive legislation on the work of CSOs is maintained in **Belarus and Azerbaijan**, while **Moldova and Ukraine** governments attempted to pass restrictive legislation targeting CSOs operating in the field of public accountability as well. In addition, even where there is willingness to work with civil society, governments have low capacity to deal with structured civil society consultations. The only exception is Georgia where civil society enjoys a freer and more conducive environment. In Belarus,

³³¹ The Joint Declaration adopted by the EU Member States and all six EaP countries at the 5th Eastern Partnership Summit in 2017 acknowledged the role of civil society in achieving the 20 Deliverables for 2020 and recognised that 'broadened outreach and targeted support to grassroots CSOs and social partners, remains an integral part of this [the Eastern] Partnership'. Based on this Declaration, 'Civil society support for better governance' was one of the eight priority sectors put forward by the EU until 2020. This came with ambitious goals to maximise the impact of the link between CSOs and citizens and to reaffirm the role of CSOs in democratic processes in partner countries. The 20 Deliverables for 2020 pursue an intensified policy dialogue with CSOs and a new tailor-made approach to capacity development. Further details: Eastern Partnership - Focusing on key priorities and deliverables, Joint Staff Working Document, 2016.

on the other hand, an alternative view provided through feedback from Belarus was that: 'EU objectives are always limited by what the Government of Belarus wants, if Government of Belarus is opposed, objectives can be meaningless'.

These framework conditions are very relevant when assessing sustainability of the capacities of CSOs. While extensive financial and technical assistance efforts have been invested (also through institutional grants, platforms, networking and direct capacity building), sustainability of capacities is dependent on the level of restrictions for civil society to operate. These can negatively affect capacities due to staff turnover and also threats to financial sustainability. Document review and interviews conducted across the region point to issues with sustainability and strong dependence on EU (or other donors) funds to ensure sustainability (with variations among countries).

The EU's previous project-level approach was not particularly conducive to ensuring institutionalisation of CSOs, particularly as institutional grants were not available in the majority of cases. Also, throughout the reference period of the evaluation, the EU has been traditionally focused more on capital city-based CSOs with less outreach to regional or local CSOs, creating an imbalance in capacities and level of influence. The EU is now introducing the re-granting schemes to overcome this challenge, but the success of re-granting schemes will depend on a number of factors, including the transparency, engagement and outreach of such schemes.

Survey results indicate a mixed picture that correlates to findings under other criteria. In Azerbaijan and Belarus, the situation is fragile – but respondents note that without EU support, the very existence of the supported CSOs might be in doubt. Belarus respondents note the fragility of the situation as illustrated by their own experiences:

- 'Experience gained by NGO participants seriously increases their level and if a person remains in the organisation, this raises the overall level of organisation. At the same time, there are cases when such employees leave for larger projects or for the work of UN agencies.'
- 'Lack of stability. At the end of the financing, most of the projects are closed, since the subjects and civil society, and the state do not have or do not plan to support them. In addition, projects with process indicators (outputs) rather than indicators of impact (impact) are accepted for financing. Thus, projects without change indicators are supported, and these projects do not plan to achieve sustainable changes in the environment and in target groups'
- 'While participating in EU-funded projects, the potential is used, but the sustainability of the organisations is not ensured'

A Moldovan CSO respondent notes that 'Members and NGOs that have acquired skills and institutional development after the end of projects are able to initiate both social actions and participate in decision-making processes, conduct advocacy campaigns, which allows them to expand the range of their services and better provide services to beneficiaries. Very effective for NGOs, very professional, with the involvement of good experts and with specific reporting requirements, M & E implements programmes of the EU Soros Foundation in Moldova, EEF, EED'.

Reliance on donor support is also referred to across the region, in survey responses. While respondents acknowledge the important contribution of EU support, they also note that this reliance can impact on sustainability (leading to donor dependency). At the same time, the strategic approach undertaken by the EU, particularly in the recent period (2012 and onwards) in its support to the civil society sphere does provide stronger stability for the civil society sphere.

Indicator 5.1b	Extent to which the achievements seen in creating an enabling environment for civil society are sustained.
	<p>As discussed in JC5.1b, sustainability of results in the enabling environment depend very much on political conditions and restrictions posed by majority of governments in the region. The EU has invested efforts in continuous dialogue with governments to include civil society in various processes, stemming from the EC commitment laid out in the above mentioned 2012 Communication, both on bilateral basis and when bringing the countries together. There have been some small positive changes recorded in Armenia most recently, with the shift in composition of government. However, these changes are fragile and dependent on political factors that are beyond the control of the EU or the civil society sector. Sustainability of results regarding the enabling environment is also dependent on the more general perception of civil society groups critical to the government as enemies of the state whose work is depicted as heavily politicised.</p> <p>Democratic reforms in Ukraine and Georgia achieved in recent years resulted in a more enabling environment for civil society, sustained over the last several years. According to local CSO interviewees in Georgia and Ukraine, many changes in the enabling environment, instilled with EU's assistance, are irreversible and will be sustained regardless of donor involvement. One Ukrainian CSO respondent lists a number of sustainable achievements:</p> <p>'To my knowledge, EU cooperated with the legislators and lead CSOs that advocated positive legislative changes; we can say EU programming contributed to development of more enabling environment for civil society. The CS can enjoy less barriers in legal registration, access to information, budget support from local budgets (especially social service CSOs), participation in decision making at both national and regional levels. The voice of CSOs is better heard. However, the anti-corruption CSOs /activists are still under the threats of physical attacks or vilification, many vulnerable groups still cannot get proper attention and protection of their rights neither via CSOs work nor via state programs. Another problem is unresolved rules for taxation of paid services provided by CSOs in Ukraine: tax offices in regions can deprive CSOs of their non-profit status for paid services provided by CSOs, which limits the funds' diversification and professional services provision. Good laws are not always work in Ukraine to ensure prosperity and equal opportunities for CSOs.'</p> <p>Moldova, on the other hand, appears to illustrate well the issue of vulnerability and reversibility of reforms including enabling environment for civil society, with recent political instability also resulted in attempts to limit the space for civil society.</p> <p>The issue of sustainability is particularly acute in countries with shrinking spaces for civil society. In the case of Azerbaijan, the situation of civil society deteriorated significantly in the last few years (see USAID CSI results above) and the EUs engagement with civil society and government had little influence on the situation, despite addressing human rights abuses at all levels and suspending some forms of co-operation (e.g. budget support). On the other hand, the situation of CSOs in Belarus improved, albeit very slightly, and the EUs diplomatic stance had some impact on freeing political prisoners and preventing further shrinking (e.g. new legislation on taxation for the unemployed and economically inactive). One Azerbaijani CSO survey respondent noted 'There is no enabling environment for civil society in Azerbaijan and it means that all actors, including civil society, EU, USAID and others failed. At least EU is able to somehow support civil society organisations in order to help them to survive from this hard situation.'</p> <p>The tone of Belarusian survey respondents is very similar:</p> <ul style="list-style-type: none"> 'For the indicated period, I am afraid that the EU has not achieved significant success in changing the framework conditions for the functioning of civil society.' 'There are weak changes in conditions (the state uses financial repression measures against activists)' 'No sustainable results, as only loyal civil society organisations or government organisations can participate in EU programmes. Independent organisations are largely excluded from these programmes. The EU does not promote and does not affect the formation of a normal environment for the functioning of civil society.'

Survey responses of CSO stakeholders most frequently refer to sustainability and enabling environment mostly in terms of national-level legislation and instruments (e.g. legislation on charitable donations and tax relief in Moldova or e-platform for CSO consultations in Armenia). This shows a limited understanding of sustainability among CSOs in the region, limited to the legislative and policy environment, with a lesser focus on CSOs internal capacities and resilience.

One recent report highlighted the success of EU support in Georgia to improving the cooperation between CSOs and the national parliament.³³² 'For years, there was a lack of cooperation and effective dialogue between civil society and the institutions of the Parliament in Georgia, with no acknowledgment of the role and importance of CSOs in the democratic political system, human rights protection and the social and economic development of the country. The EUD supported a project implemented by the Civil Society Institute to develop a memorandum for cooperation between the Parliament and civil society, which was signed by the Parliament Chairman and more than 145 CSOs, with others invited to join. The Memorandum established new standards of cooperation, with CSOs formally recognised as equal development partners ensuring their institutional involvement in the law-making process. The Parliament also acknowledged the significance of dialogue with CSOs and supported their involvement a constructive manner, with due diligence and for the best interests of the country.'

Indicator 5.1c

Extent to which the achievements seen in enhanced involvement of civil society in the policy sphere are maintained.

Variations exist in the level of sustainability with regards to enhanced involvement of civil society in the policy sphere. In some countries in the ENI region, such as Azerbaijan and Belarus, restrictions for involvement of civil society in the policy sphere is very visible, with a further circle of restrictions in the form of constraining CSOs' access to funding, increasing reporting requirements, and state harassment of CSOs criticising the work of the government or holding it accountable. The EU has been investing in dialogue with these governments, but the effects have been minimal (See EQ 3 above). In other countries, there are some positive results, and data collected through document review and interviews points to the fact that the sustainability prospects are higher for established dialogue and civil society engagement in policy/decision making at local level than at national level. For example, projects implemented in **Ukraine and Georgia** show more sustainable links and cooperation between CSOs and governments (mainly at local level) but also with other civil society or developmental partners. One Ukrainian CSO survey respondent notes a number of challenges remaining: 'It is very weak improvements. Many donors built their programs around citizens' engagement. Small progress is visible in increase of number of CSOs, new CSOs emerged in the regions of Ukraine, more information available for citizens. Some improvement is noted in rural areas due to strong support of decentralisation reform and local initiatives. However, we cannot say about increase in the overall citizens' engagement as behaviour change at the grass-root level.'

In Azerbaijan, comments on sustainability mirror those on effectiveness and impact – one Azerbaijani CSO respondent notes that 'the confidence between CSOs and the national and local authorities is currently on a very low scale, and CS community in the country must function in a highly adverse environment. The current state of affairs ultimately impacts ability of CSOs to contribute to policy shaping in the country.'

In other countries or across the mainstream project sample, many CSO respondents claimed that, more often than not, CSOs in the policy sphere remain ignored, and only informed after the fact of a decision being made.

The 2015 ROM Report for the 'Increasing civil society participation in national policy dialogue in **Armenia**' project noted that '[t]he sustainability prospects are not very favourable. This is foremost due to the generally weak level of development of the civil society sector in Armenia (resulting in only limited weight in influencing of the key national policies).'

Of course, in all countries one can find actions that have good prospects, or have already achieved, sustainable outcomes. One recent study highlighted the 2012-2014 Women in Local Democracy (WiLD) project in Armenia. This recognised network building as a key strategy to inspire and encourage women to participate in decision making in order to reduce gender-specific constraints that women face in social and political life. "The networking activities supported by the EU took the form of a series of workshops and meetings with representatives from LAs, civil society, and the community on gender-related issues and inclusive and responsive

³³² EU (DEVCO.A.5 CSO Roadmap Facility) (2016) "EU Support to the Enabling Environment for Civil Society Organisations in Partner Countries"

governance. These included periodic meetings to discuss local level issues with the national authorities, online thematic discussion forums, and a Gender and Democratic Governance Community of Practice (CoP) annual workshop. The aim was to promote better social partnerships and stimulate tolerant and constructive dialogue. Activities supported the participation of women in the local elections in the period 2012–2014.”³³³

Judgement Criterion 5.2: The design and implementation of EU interventions and activities have facilitated sustainability

Indicator 5.2a **Phasing-out measures were developed and deployed.**

Evidence collected across the document review of strategic, programming and project documentation as well as interviews shows that phasing out measures have not been developed in any systematic way.

Interviews with stakeholders across the region revealed further weaknesses in this respect. As EU funds (notably targeted support, but also in policy engagement and in mainstreaming) are disbursed through selection of projects submitted in response to calls for proposals with very precisely prescribed time- and financial frames, there is very limited possibility to extend a project that is performing well and producing good results as well as broad impact. Absence of mechanisms for EU or civil society to extend impactful through direct continuation, skipping the cumbersome application and approval process, is an important weakness in opinion of many Eastern Partnership CSO and public stakeholders.

In projects and countries concerning shrinking spaces for civil society, lack of phasing-out measures is indicated as a particularly acute weakness of EU programming. In case of projects supporting human rights defenders or independent journalists in Belarus and Azerbaijan, flexibility and possibility of effective phasing-out of EU projects is perceived as very important.

Indicator 5.2b **Effective liaison over sustainability was conducted with key stakeholders in the civil society, governmental and international donor spheres.**

The review of strategic and programming documents for civil society, including sample reports, Roadmaps and interviews with stakeholders during field missions' points to efforts by EU and other development partners in countries in the region to improve coherence of the approach to issues of civil society. However, this coordination is not comprehensive and, when it comes to sustainability, it depends largely on factors that the EU or any other development partner cannot control (e.g. political and social factors noted above and in EQ4).

The fact that the EU approaches different Eastern Partnership countries differently makes it difficult to have a more meaningful motivation ('carrot' approach) for more sustainable results in terms of civil society inclusion in policy processes.

Three of the Eastern Partnership (EaP) countries (**Georgia, Moldova, and Ukraine**), enjoy measures to support the EU's offer of deep and comprehensive free trade (via DCFTA) and close political association, albeit not the full EU membership. **Armenia, Azerbaijan and Belarus** do not have enjoy the same level of strategic relationship. In view of this, EU's efforts are uneven across the region.

Interviews with stakeholders confirm that EU does liaise with key stakeholders across civil society, government and donor spheres over sustainability but that those efforts are contingent on so many variables, no 'effective liaison' can be claimed in any of the countries.

³³³ EU (DEVCO.A.5 CSO Roadmap Facility) (2016) EU Support to Capacity Development of Civil Society Organisations

EQ6 (Coordination, complementarity and coherence): To what extent have the various forms of EU engagement (including policy dialogue and financial support) with civil society in the Neighbourhood East been effectively coordinated, complementary, and coherent with the activities of EU MS and other donors?

Judgement Criterion 6.1: Links between policy work, multi-stakeholder dialogues (e.g. fora) and financial support were effectively established and coordinated in The Neighbourhood East

Indicator 6.1a	Effective coordination among relevant EU DGs, EEAS, EUDs etc. was established over the question of EU engagement with civil society
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Interviewees among CSOs and EU staff have the impression that on the one hand there are efforts at the level of EUDs and also in EEAS and NEAR to develop coordination and coherence, but on the other hand these remain limited in scope and effectiveness.

There are exchanges and consultations within EUDs. However, variations exist between countries in the level to which coherence and coordination is achieved. For example, EUD in Ukraine is very large, with over 100 staff and three sections working on civil society, making it harder to ensure internal coordination of issues pertaining civil society due to the scope and amount of activities with civil society and in different regions, creating potential for a silo approach even among colleagues working on civil society issues. In other countries, where EUDs are smaller, interviewed EUD staff believe that it is easier to coordinate.

Although EUDs have civil society focal points, these colleagues tend to be relatively junior, and do not have significant powers of convocation and coordination.

EU staff in several Delegations reported that there were no regular civil society coordination meetings within the cooperation section, and even less so with the political and other relevant sections.

Several EUD staff mentioned challenges in coordination and even in information exchange regarding multi-country actions. The general perception is that only the EUD or HQ unit where the contract is managed is well informed about the action, and the other EUDs are often not well informed about the component of the action taking place in their country. One of the actions in the sample retained for this evaluation was an EIDHR action implemented by a consortium leader in Armenia but with some activities in Belarus. EUD staff in Minsk stated that, because of the project's decentralised nature, the Minsk EUD had very little oversight or information on the project, no liaison took place, and no synergies were established.

Interviewed EUD staff in Armenia, Belarus, Georgia and Ukraine reported having a very limited insight into the operations of CBC programmes and the role of civil society organisations in them. According to staff of the Joint Technical Secretariat of ENI CBC Black Sea Basin, over 70% of applicants and over 50% of programme beneficiaries are CSOs, and the programme is an important instrument of EU engagement with civil society in border regions of Ukraine, Georgia and Armenia. Staff of the Poland-Belarus-Ukraine CBC Programme Secretariat also confirmed high levels of interest among CSOs in Belarus and Ukraine in participation in the programme, while also reporting low levels of co-ordination with EUDs in both countries.

When it comes to coordination between EU DGs and EUD sections working with civil society, coordination becomes much more difficult and there are missing links. EU DGs which have their own interventions in specific sectors (e.g. trade or agriculture) tend not to engage EUD sections dealing with civil society too much, or only in some cases when there is an absolutely visible link. For example, the EU 'development co-operation' programme in Georgia is involved in a wider and complex co-operation and political framework. Yet, it appears to have run largely in isolation. As the 2015 Evaluation of EU co-operation with Georgia (2007-2013) states, 'Although EU support was embedded in a geopolitical struggle for political and commercial interest, particularly after 2008, the co-operation programme shared most of the characteristics of a programme carried out in a typical (albeit post-conflict) developing country'. The focus was largely on ENPI bilateral assistance. The EUD was not 'in the loop' on the involvement of multiple Brussels DGs in, for instance, PFM. While DCFTA is largely the purview of DG Trade, there was little trade expertise at the

EUD. While IDPs and Conflict Resolution was highly political and cut across all sectors of co-operation, the political section at the EUD was too small to keep on top of the large and broad co-operation programme'. This is a weakness particularly from the point of the strategic orientation towards mainstreaming civil society.

According to CSO interviewees in field mission countries, there are cases where similar interventions are funded by different EU programmes and they are not effectively co-operating. Partner country CSO interviewees often attribute this to what they consider an excessive reliance on international CSOs and private service contractors who lack contacts on the ground.

When it comes to guidance documents and policies, most interviewees familiar with programming and policy matters confirmed that DG NEAR's Civil Society CoTE provides comprehensive and up to date information (see JC 3.2b).

Judgement Criterion 6.2: The combined efforts of the EU and EU Member States and other donors have led to a coherent and complementary response to the needs of civil society.

Indicator 6.2a	Effective coordination between the EU and EU Member States and other donors was achieved.
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As the biggest donor across the region, the EU invests efforts to attend donor coordination meetings in all Eastern Partnership countries (e.g. in **Ukraine**, it co-chairs the civil society donor group with the US Government, and in **Belarus**, it regularly attends the Belarus International Implementers Meeting (BIIM) where main streams of activities, goals, achievements and challenges are discussed, and in **Armenia** EUD liaises regularly with USAID over priorities and programming). However, interviewed EUD staff reported that such meetings are often limited to general discussions, with not many cases where identified overlaps are overcome, and some EUD staff reported that existing coordination mechanisms are insufficient, for example in **Georgia**. Difficulties in donor coordination are also visible in countries with restrictive measures where donors need to act in confidence and most often from outside the country, making the coordination more difficult due to sensitivity of support to civil society.

Reviewed strategic and programming documents present elaborated analyses of lessons learned from previous interventions of EU but also other donors. There are also clear linkages with ongoing or planned interventions by donors in the field.

Roadmaps for civil society have been prepared in close consultation with EU MS and in some occasions other like-minded donors in each of the countries covered by this evaluation. E.g. the Georgia Roadmap (2014-2017) maps support of USAID in the field, and the Belarus Roadmap (2018-2020) considers UN activities in related areas:

'The Roadmap goals are taken into account in annual revision of Human Rights and Democracy Country strategies.

Moreover, the Roadmap supports the implementation of National Human Rights Action Plan and National Gender Action Plan as long as the priorities of these documents coincide with priorities of EU Human Rights Guidelines and Universal Periodic Review recommendations.'

Sample project documentation also show attempts by grant beneficiaries to elaborate the donor context and identify how synergies and complementarities will be ensured in implementation. This reflects the requirements of the Full Application template (Annex A to Grant Contracts). The level of elaboration varies, though, and in some projects (e.g. three projects in **Moldova**) it is presented in vague terms, while in the remaining 19 projects analysis of complementarities and synergies is also presented in progress and final reports besides the Description of Action (DoA) document.

Survey results in the case of Ukraine reveal concerns regarding donor coordination, with some respondents reporting that there is significant duplication of efforts.

Judgement Criterion 6.3: Synergies were achieved and duplication of efforts of the EU, EU MS and other donors was avoided in the Neighbourhood East.

Indicator 6.3a	Extent to which synergies were identified and exploited, overlaps were avoided at the policy level
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The evaluation process did not reveal any evidence of significantly divergent views and positions between EU, EU MS and other donors on issues regarding civil society and its inclusion in governance processes in the countries in the region. The review of policy documents of various donors shows that political support to civil society is there, together with advocacy on the need to empower and engage civil society in governance and policy making processes. In general, messages that come from the EU, EU MS and donors follow this same line, for example:

SIDA's objectives in Georgia:

- Enhanced economic integration with the EU and development of market economy.
- Strengthened democracy, greater respect for human rights and a more fully developed state under the rule of law.
- A better environment and reduced climate impact and enhanced resilience to environmental impact and climate change.

USAID's goals for Georgia:

- Georgia's democratic, free-market, Western-oriented transformation strengthened and sustained
- Democratic checks and balances and accountable governance enhanced
- Inclusive and sustainable economic growth
- Increasingly stable, integrated and healthy society

There are also cases where EU, EU MS and donors jointly prepare letters to the government raising their concern regarding treatment of civil society (e.g. in **Azerbaijan**). However, more effort could be invested in holding/maintaining a joint dialogue with the government, as such political leverage would be stronger than individual efforts.

In Azerbaijan and Belarus, many interviewed stakeholders criticise the EU's diplomatic or neutral stance with governments or lack of stronger messages when it comes to protection or advocating protection of civil society from restrictive measures and also undemocratic practices. Some interviewees in Belarus suggested that what they perceive as Member States' lack of coordination with the EU as well as diverging political and tactical interests between the Europeans sometimes hinder effective leveraging of resources.

Indicator 6.3b	Extent to which synergies were identified and exploited, overlaps were avoided at the implementation level.
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The evaluation did not establish conclusive findings for this Indicator.

EQ7 (EU-added value): To what extent have the various forms of EU's engagement with Civil Society in the Neighbourhood East over the evaluation period had characteristics which distinguished it from that of other actors?

Judgement Criterion 7.1: EU support to civil society in these regions has had a distinctive feature in comparison with that provided by other actors, based on its comprehensive and multi-faceted approach.

Indicator 7.1a	The combination of forms of engagement with civil society has been a distinctive feature of the EU's support.
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Interviewees in all field mission countries (Armenia, Belarus, Ukraine) reported that other donors use policy engagement instruments and mainstreaming, but none of them can combine it to the extent the EU does. The main reason given for this is the EU's role as a key economic and political partner of countries in the region, most notable in countries with Association Agreements /DCFTAs and other bilateral agreements. In the words of one Ukrainian interviewee, the impression is that 'the EU does everything everywhere' for and with civil society.

Most interviewees in countries with AAs/DCFTAs and related agreements (CEPA) note that the distinctive feature of EU's support to civil society lies not only in combination of forms of engagement but their connection to the wider EU foreign policy and bilateral relations with those countries (notably those with AAs). The 2015 evaluation of EU's co-operation with **Georgia** (2007-2013) notes the distinctive feature of three forms of engagements under evaluation: 'The EU has contributed significantly to Civil Society's role in democratic development in Georgia. At the political level, the EU has insisted on a place at the table for Civil Society; for example, through the Structured Dialogue with CSOs and Local Authorities on policy issues. As a result, in areas such as Agriculture, Justice sector reform, and IDPs, the relevant EQs have revealed growing engagement of Civil Society. Through the CSF and support to the Georgian National Platform, the EU has lent weight and voice to Georgian Civil Society. EU projects were responsible for the Kutaisi and Sugdidi initiatives described above. EU support for Civil Society in Abkhazia provided a lifeline for groups in that breakaway region.'

In countries with restricted spaces for civil society, such as **Belarus**, the EU does not use all forms of engagement to the extent it does in other countries, and yet it remains the most active civil society donor with the widest range of forms of cooperation and support. This distinctive feature of EU support in countries with restricted spaces for civil society is reinforced by the absence of many other donors. In Belarus, the EU has gone further than other donors in mainstreaming support to civil society.

There is evidence of efforts by the EU to engage with EU MS and other development partners in coordinating assistance and finding complementarities for more comprehensive support to civil society which further increases added value of EU support (also see JC6.1). All interviewed representatives of development partners agree that the EU is a credible and trusted partner, which invests efforts to leverage its support towards achievement of developmental goals for countries in the region. Interviewees emphasise that this is extremely valuable, particularly taking into account the generally challenging environments in which civil society operates in the majority of the countries in the region.

Survey responses across all countries of the region identify the size and the duration of EU's engagement as two most distinguished features, frequently noting that the EU is the largest civil society donor in the region, followed by the US/USAID and other MS (notably Sweden). Responses also refer to initiatives that the EU supports that other donors shy away from, considering them too risky. Respondents value the strategic nature of EU support, compared to that of other donors. At the same time, most interview respondents noted that – where available, grant funding for civil society from other donors comes with simpler application and reporting requirements.

Indicator 7.1b	The combination of thematic and regional instruments has been a distinctive feature of the EU's support.
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The combination of thematic and regional instruments is a significant feature of EU support. The regional ENI and its predecessors provide more than 90% of financial support and are responsible for more than 90% of relevant actions. The thematic programmes EIDHR and CSO-LA represent less than 10% of relevant actions

and less than 10% of funding. The thematic focus of these thematic programmes is highly relevant to EU objectives regarding civil society, and (particularly in the case of EIDHR) there is additional flexibility, wider eligibility and a smaller minimum EU contribution. However, in financial terms and in number of relevant actions financed, they have remained marginal within overall EU support to civil society in the six countries covered by this evaluation. These trends are illustrated in the following charts, the second of which shows the relative importance of each funding source in relevant EU support to selected themes.

Figure 10 Financial contribution and number of projects in support of civil society in the Neighbourhood East by financial instrument, 2013-2018

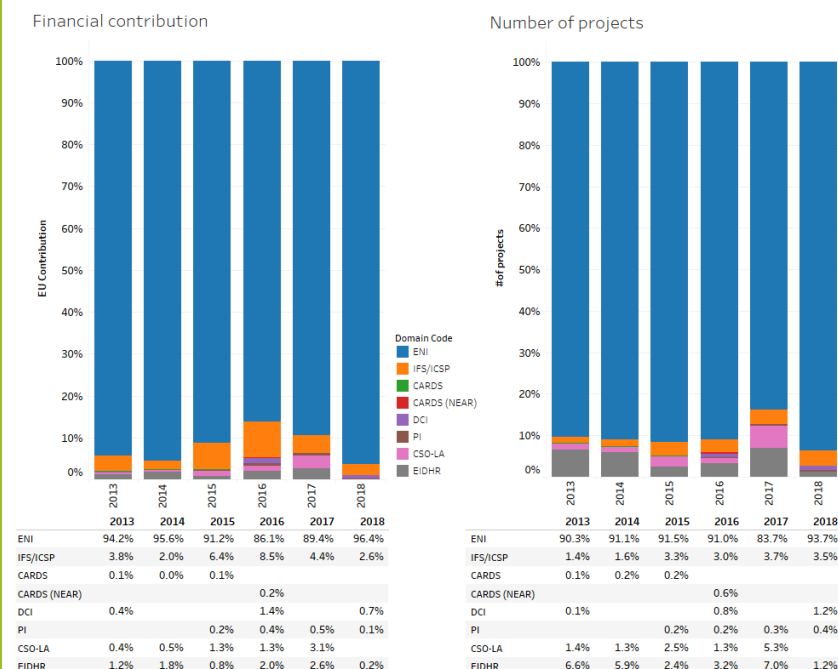
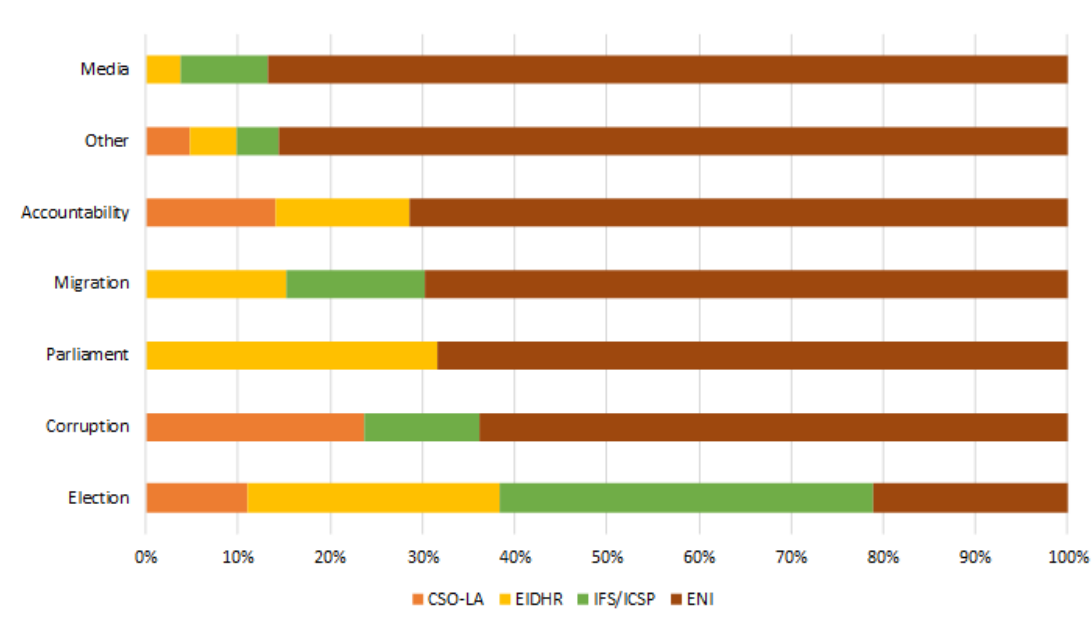


Figure 11 Distribution of civil society support across different themes, by financial instrument 2013-2018



Source: (Figure 10) Landell Mills' analysis of all contracts for external action in the countries concerned during the period 2013-2018, which the evaluation team classified as targeted or mainstreamed support to civil society; and (Figure 11) analysis of all contracts for external action in the countries concerned during the period 2013-2018, which the evaluation team classified as targeted or mainstreamed support to civil society, and which the evaluation team classified as addressing the selected themes.

Indicator 7.1c

The combination of modalities and modes of engagement has been a distinctive feature of the EU's support.

Regarding sector budget support, most interview respondents stated that complementary measures have provided useful, though limited and ad hoc support to CSO engagement on transparency, accountability and good governance themes. A recent study identified Moldova as "one of the countries where issues of democratic accountability and civil society engagement has been most systematically addressed in budget support across several sectors of EU bilateral cooperation."³³⁴ For example, "Sector budget support for police reform included among its specific objectives the promotion and implementation of the principle of zero tolerance to

334 DEVCO Supporting Democracy Facility (2017) "Draft Compendium of success stories in EU support to democratic accountability."

corruption, discrimination and ill-treatment in the police force. Although there were no specific complementary measures involving CSOs, the promotion and implementation of zero tolerance to corruption, discrimination and ill treatment by police creates a specific space for civil society engagement.”³³⁵

A recent study identified successes in engaging civil society in sector budget support to prepare the EU-Moldova Deep and Comprehensive Free Trade Agreement (DCFTA), through the use of complementary measures to increase the capacity of CSOs to dialogue on economic and DCFTA related matters.³³⁶

In Moldova, the conditions for variable tranches for sector budget support in Public Finance Management require that Parliament establish a multi-stakeholder anti-corruption forum, which shall hold quarterly meetings and publish reports of its meetings. Under complementary measures, grants are provided to CSOs on complementary issues.³³⁷

The EED is widely perceived as a valuable extension of EU’s scope of modalities, notably to human rights defenders and organisations engaging with sensitive or controversial activities. It is thus regarded as valuable for civil society and its outreach to constituencies. Interviewees agree that it would be extremely difficult to implement the majority of civil society initiatives without this support.

There are some differences in EU’s distinctiveness depending on the country situation and donor landscape.

Interviewees in Armenia noted that the EU is the only donor working with all modalities including sub-granting, capacity-building, Technical Assistance, direct grants, regional structures (EaP CSF) and across all three modes of engagement covering targeted, policy and mainstreaming. What is more, interviewees noted that other donors in Armenia often choose a ‘niche’ (sector, topic, issues) to focus on, often choosing areas where the EU is not active, whereas the EU has a more comprehensive engagement.

There is a very limited number of donors working in Belarus, and so local interviewees noted that the EU is distinctive in all aspects, namely modalities, modes of engagement and size of support.

Interviewees in Ukraine noted that there are many significant donors in the country and that many of them remain active across modalities and modes of engagement – e.g. USAID works through granting and sub-granting and capacity-building as well as supports CSOs in policy engagement and mainstreaming in other sectors, so EU is less distinctive in this field yet remains the one with the most comprehensive portfolio of interventions.

EQ8 (EU-added value): To what extent could changes, which the EU contributed to, have happened in its absence?

Judgement Criterion 8.1: EU support has been an essential factor in contributing to significant change in the sphere of civil society development in each of the regions.

Indicator 8.1a

EU support has responded to an extent or in ways not provided by other donors

The evidence of EU’s support responding to an extent and in ways not provided by other donors overlaps greatly with JCs 7.1a, 7.1b and 7.1c.

³³⁵ C-382803. The total EU contribution to this sector budget support is €51m.

³³⁶ C-353290. Sector budget support is 25 MEUR, with an additional 5 MEUR for complementary measures. Of this, 300 000 EUR is reserved for grants to CSOs, who should provide 20% co-financing (an additional 75,000 EUR). For more details see DEVCO Supporting Democracy Facility (2017) “Draft Compendium of success stories in EU support to democratic accountability.”

³³⁷ C-353323. Sector budget support is 33 M EUR, with an additional 4 MEUR for complementary measures. Of this, 250 000 EUR is reserved for grants to CSOs, who should provide 20% co-financing. For more details see DEVCO Supporting Democracy Facility (2017) “Draft Compendium of success stories in EU support to democratic accountability.”

During the period covered by this evaluation, the EU has increasingly structured and focused its support to civil society around the three priorities of the 2012 Communication: enabling environment, civil society engagement in domestic policies, and capacity strengthening. This support improves the environment and preconditions for other donors' engagement, which tends to be on a thematic basis.

A significant number of interviewees suggested that national authorities in the Neighbourhood East countries are less open towards CSO engagement in policy processes and in the absence of EU engagement in the field are less likely to engage with CSOs on a regular basis.

Field mission interviews as well as survey responses from civil society organisations reveal two groups of responses regarding EU support vs other donors: retrospective and prospective.

In terms of retrospective analysis, the respondents are united in agreement that absence of EU support in the Eastern Partnership in 2007-2018 would have had a severely detrimental impact on the sector and on the countries in general. This was particularly highlighted by respondents working in or with countries that have undergone substantial regime change or reforms, notably Georgia and Ukraine but is also visible in Moldova and recently, Armenia. In the words of one respondent in Ukraine, the absence of EU engagement for civil society would be 'simply catastrophic'.

In terms of prospective analysis, most respondents across all three field missions (Armenia, Belarus and Ukraine), highlighted three key elements. The first one is the irreversibility of some areas of impact of EU engagement, notably increase in civil society's capacity to act. The second one is civil society's internal agency as an independent actor, growing out of grassroots and as such not having to depend on donor support. The third one was general optimism as for the possible replacement of EU support with that of other donors. Even though there was general consensus that the EU was the largest actor (see EQ7) by a large margin, there was optimism as to the possible (prospective) replacement of EU engagement by other actors.

Indicator 8.1b

The EU has been able to leverage institutional and financial resources not available to other donors

The EU has invested significant financial and policy resources in supporting civil society to take a more active role in decision making processes across the region. It has also invested in engaging with governments in political dialogue on issues of civil society, advocating a more enabling environment for civil society to be able to contribute to reform processes.

Field missions exposed a mixture of responses regarding to the success of the EU when it comes to leveraging financial support through political pressure on governments to create more favourable/democratic mechanisms for participatory decision-making processes.

Many stakeholders interviewed in the field compare the EU with other large donors such as the US government. US support to the region is large, albeit with a smaller funding envelope for civil society than the EU.

Most interviewees comparing EU and US leverage contend that the US government is perceived to have stronger and clearer messages on key issues of relevance to civil society, such as the need for engagement, criticism of restrictive policies, and is able to leverage more significant institutional and particularly political resources in some areas. Interlocutors emphasise the need to use the EU's positioning in the region and the leverage it has with the governments to advocate more strongly for the continuation of democratic reforms, and engagement with civil society.

Data collected through document review and interviews point to the EU's ability to leverage institutional and financial resources that are much larger than those of other donors resulting in increased capacities and confidence of civil society to engage in policy making and monitoring and also service provision and advocacy for and on behalf of their constituencies. This is seen as the most important value added of EU engagement.

4. Russia

EQ1 (Relevance): To what extent have the EU's objectives and approaches to its engagement (policy dialogue and financial support) with civil society properly addressed the variety of problems faced by / needs of civil society actors in Russia over the evaluation period?

Judgement Criterion 1.1: The EU's objectives with regard to its support to civil society have evolved effectively in line with the needs of civil society actors over this period in Russia

The Partnership and Cooperation Agreement (PCA) established in 1997 forms the legal basis for EU-Russia relations. It is based on *“the principles of respect for democracy and human rights, political and economic freedom, and commitment to international peace and security”*³³⁸. In 2003 the EU and Russia agreed four Common Spaces: *“an economic space; a freedom, security and justice space; an external security space; and a research, education and culture space”*³³⁹ as a renewed basis for cooperation. In 2008, the EU and Russia moved towards the negotiation of a new agreement in areas such as *“political dialogue, justice, liberty, security, economic cooperation, research, education, culture, trade, investment and energy”*. These negotiations resulted in the ‘Partnership for Modernisation’ launched in 2010. However, EU-Russian relations saw significant deterioration in 2013-2014 over developments seen in the Neighbourhood East Region, culminating in the introduction of EU sanctions in response to the Russian annexation of the Crimea. As a result, EU-Russia cooperation has been severely curtailed / frozen, with the exception of those areas defined in the Five Guiding Principles introduced by the EU in 2016 (*“full implementation of the Minsk agreements; closer ties with Russia's former Soviet neighbours; strengthening EU resilience to Russian threats; selective engagement with Russia on certain issues such as counter-terrorism; and support for people-to-people contacts”*³⁴⁰).

Under the period of evaluation, EU was engaging with Russian civil society through financed and non-financed forms of support, albeit within an increasingly restrictive environment since 2012. The overarching programmatic document that defined EU engagement with Russian civil society in that period was the EU Country Strategy Paper (2007-2013) for the Russian Federation. It characterised Russian civil society as “relatively weak”³⁴¹, emphasising a challenging political environment within which Russian civil society organisations operate. It set the EU objectives with regard to its engagement with Russian civil society as *“bolstering the role of civil society in the promotion of human rights and democratic reform, and in supporting conflict prevention”* within the framework of the EIDHR Instrument³⁴² as well as involving civil society in the development of the Common Spaces. For the latter purpose, cooperation between EU and Russian civil society was envisaged in the spheres of combating human trafficking³⁴³, combatting corruption³⁴⁴, cross-border cooperation³⁴⁵. The Five Guiding Principles introduced by the EU in 2016 reinforced EU commitment to support of Russian civil society within the people-to-people contacts. The reviewed programmatic documentation does not explicitly engage with or set out an analysis of the needs of Russian civil society.

³³⁸ https://eeas.europa.eu/headquarters/headquarters-homepage/35939/european-union-and-russian-federation_en

³³⁹ http://europa.eu/rapid/press-release_MEMO-05-103_en.htm

³⁴⁰ <https://www.euneighbours.eu/en/east/stay-informed/news/eu-reaches-agreement-guiding-principles-its-policy-towards-russia>

³⁴¹ EU Country Strategy Paper (2007-2013), Russian Federation, p.3

³⁴² EU Country Strategy Paper (2007-2013), Russian Federation, p. 26

³⁴³ EU Country Strategy Paper (2007-2013), Russian Federation, p. 43

³⁴⁴ EU Country Strategy Paper (2007-2013), Russian Federation, p. 44

³⁴⁵ EU Country Strategy Paper (2007-2013), Russian Federation, p.27

Indicator 1.1a	Stakeholders confirm the relevance of EU objectives relating to its engagement with civil society over the period under evaluation
<p>EU-Russia Civil Society Forum (EU-Russia CSF) members note a sharp increase in the need for EU support for civil society in Russia (mostly due to shrinking space for civil society, notably since 2012 when the 'Foreign Agent Law' was introduced). Russian respondents to the civil society survey further note that, in principle, there has been an increased need in the kind of support that the EU provides for Russian civil society in recent years. This relates not only to the financed and non-financed support, but also to the political support that the EU could provide through its engagement with the Russian government. However, the respondents note a perceived disconnect between the heightened salience of and need for EU support in principle and the contraction of actual EU support to Russian civil society. This assessment is summed up by one of the respondents: <i>"In Russia the prospects for civil society worsen year by year. The most important need of NGOs is to have access to independent funding sources. But EU support increasingly amounts only to declarations of good intent and nice words about the importance of the role of civil society."</i></p>	
Indicator 1.1b	The rationale for the evolution of EU objectives is presented in key policy and programmatic documentation
<p>The evolution of EU support to Russian civil society needs to be assessed in relation to the following conflicting trends. The evolution in EU engagement with civil society as presented in the 2012 EC Communication "The Roots of Democracy", aimed at strengthening the role of civil society actors and organisations to perform their role as development actors. However, this coincided with the tightening of restrictions placed on civil society through changes in legislation and the practices of state authorities in Russia since 2012, aimed at curtailing civil society's capacity to influence the policy sphere and the potential for civic participation. This trend was accompanied by the deterioration in relations between the EU and Russia since 2013-14.</p> <p>While EU support to civil society, globally, has been increasingly seeking to foster an enabling environment, in the case of Russia the Russian government has been intensifying its efforts in shrinking the environment both for civil society and foreign donors operating in Russia. It is within this context that the European Parliament, in its resolution on EU-Russian relations adopted in 2015, stressed <i>"the importance of continued political and financial support for independent civil society activists, human rights defenders, bloggers, independent media, outspoken academics and public figures and NGOs, with a view to promoting democratic values, fundamental freedoms and human rights in Russia and in occupied Crimea."</i>³⁴⁶ It called on the European Commission to provide "more ambitious financial assistance to Russian civil society from the existing external financial instruments."³⁴⁷</p> <p>In 2016, the EU adopted its Five Guiding principles in EU-Russia relations, including support to people-to-people contacts and civil society, underlying the fact the EU imposed sanctions on the Russian government, not the Russian people³⁴⁸. These Guidelines, however, do not specify how to operationalise the EU support to civil society in Russia in a worsened political and legal climate. This would have required a development of the EU strategic approach that would factor the challenges and threats that Russian civil society and Russian citizens face when they chose to pursue independent civic and political activity, and define a strategic approach to the EU support to Russia. As the review below demonstrates, in the absence of such a strategy the EC continued to channel its support to Russian civil society predominantly via the existing common instruments and modalities - such as grants awarded via the EIDHR - that were insufficiently adapted for the Russian context post-2012 as shown below.</p>	
Indicator 1.1c	Consultations with civil society actors and organisations were used to inform the evolution of EU objectives
<p>Policy-level documentation does not refer explicitly to consultations with civil society, relating rather more broadly to the commitments, objectives, practices, and values with regard to fundamental freedoms, human rights, and civil society. No needs assessment reports or reports on consultations with civil society were</p>	

³⁴⁶ European Parliament resolution of 10 June 2015 on the state of EU-Russian relations, <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2015-0225+0+DOC+XML+V0//EN>

³⁴⁷ *ibid*

³⁴⁸ The EU's Russia policy: Five guiding principles, [http://www.europarl.europa.eu/thinktank/en/document.html?reference=EPRS_BRI\(2016\)589857](http://www.europarl.europa.eu/thinktank/en/document.html?reference=EPRS_BRI(2016)589857)

available for the evaluation in order to assess this indicator. Some EU-Russia CSF members representing larger Moscow-based CSOs note that they are involved in consultations on a regular basis. Respondents to the survey conducted for the current evaluation noted that they had not been involved in such consultations.

Judgement Criterion 1.2: The EU's approaches to supporting and engaging with civil society have evolved effectively in line with the needs of civil society actors over this period in Russia

The analysis of the current situation points to a serious dilemma for the EU support to CSOs in Russia. On the one hand, Russian independent CSOs whose work in areas of civic and public life is contested by Russian authorities have an increased need in political and financial support, but on the other hand the available EU support for such organisations contains an in-built risk for the EU grantees -of becoming even more exposed in the hostile legislative climate. Despite the risks, there is strong demand for EU support as evidenced by the number of applications received for the recent EIDHR Calls. There is a danger, however, that the EU support inadvertently brings these CSOs into conflict with the authorities and can lead to criminal charges/criminalisation.

Indicator 1.2a	The appropriateness of the targeting of engagement activities, including outreach and diversification questions
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This indicator is assessed against programmatic objectives of EU support to civil society, which are not directly and explicitly linked to the needs of civil society. The available documentary evidence does not explicitly address the needs of Russian civil society and therefore does not constitute sufficient basis to allow for the assessment of the indicator against the needs of civil society.

EU support to civil society prior to 2012

Documentary review of EU support prior to 2012 has demonstrated that the EU approach to supporting civil society organisations was appropriate in relation to its specified objectives, and led to the achievement of effective results. The EU's engagement with civil society in Russia included support in the sphere of human rights and democratisation via the EIDHR Programme, while the IBPP offered an opportunity to support NGOs working in the sphere of children's rights, women's rights, disability rights, and the NSA-LA focused on the promotion of partnerships between civil society actors and local authorities. On the whole, the aims of the Actions supported by the EU during that period were achievable, and activities implemented under the EU projects were received positively by grassroots/ local stakeholders, and beneficiaries. With regard to outreach, all Calls for Proposals included provisions for partnership development, grass-root outreach, small grants, and re-granting. The review of the Calls conducted for the current evaluation indicates that a broad range of civil society actors (NSA) was indeed promoted by the IBPP and NSA-LA Programmes including organisations representing religious groups, national minorities, organisations fighting corruption, universities, citizens' groups, etc.

EU support to civil society post-2012

The introduction of restrictive legislative measures by the Russian government, aimed at discouraging Russian NGOs from seeking foreign funding in pursuit of activities broadly labelled as "political activity," should have led – in the opinion of the current evaluation – to an adaptation in the EU approach towards supporting Russian civil society. This adaptation was required at the programming and implementation level in order not to expose Russian CSOs in an increasingly hostile environment, through an adoption of a "no-harm approach" that would have involved, for instance, risk assessment and screening of Call for Proposals against the Russian restrictive legislation and adapting them for the Russian context with the aim of avoiding risks of exposure for civil society actors through clashes with the Russian legislation governing the work of Russian NGOs.

Some adaptation of the EU approach, in particular in the latter part of the period under evaluation, is evident at the implementation level. For instance, support provided to activities pertinent in the Russian context, such as the development of innovative, internet-based tools, capacity development in fundraising, PR, engagement with volunteers, appears to reflect the current needs of the civil society sphere. The relaxation of certain EU financial or visibility requirements can also be seen to reflect such needs. These, however, represent a set of reactive measures on the part of the EU, aimed at damage-limitation to problems that had already emerged. Further adaptations for the Russian context should have been introduced, in the opinion of the current evaluation, at the programmatic level with

regard to the aims and objectives of the Calls for Proposals funded under the EIDHR and NSA-LA (CSO-LA) in order to lessen/avoid the risk of NGOs that received funding falling subject to the Foreign Agent legislation.

Whilst EUD Moscow sought to adopt an approach of *“facilitating, not setting, the agenda for civil society”*³⁴⁹, in practice, it appears to have been applied only partially through the EU’s approach. According to this approach, the EU does not prescribe the nature of activities at the project level, but funding applicants must demonstrate how their proposed workplans respond to the EU objectives as specified in the Calls for Proposals, which in turn serves to shape the applicants’ agenda. The review of the Calls for Proposals under the EIDHR and NSA-LA, for instance, indicates that the Calls were not sufficiently sensitive with regard to the pressures imposed on Russian NGOs by the restrictive legislation put in place by the Russian government. For instance, according to the Russian Legislation, any attempt at influencing governmental policy or public opinion with the aim of influencing policy-making falls under the category of “political activity”, and a Russian NGO that receives foreign funding for the conduct of such activities becomes a subject to the law on Foreign Agents. The evaluation acknowledges that it is difficult to achieve a balance between promoting EIDHR objectives and respecting Russian legislation, noting that the EUD attempts to formulate the objective in the most neutral way, avoiding the most challenging words like advocacy, LGBT rights whilst also ensuring an adherence to the universal Human rights and Democracy agenda void and irrelevant.

However - the promotion of aims that fall under the above-mentioned definition of “political activity” are present in the EU Calls for Proposals throughout the period post-2012. For instance, the *“sensitisation of public opinion about the work of human rights defenders, the role of civil society in defence of human rights and democracy and about the situation of vulnerable groups”* is listed among the aims of the 2013 EIDHR Call³⁵⁰. The NSA 2014 Call for Proposals list the following aim that can be regarded by Russian authorities as clashing with the Russian legislation: *“CSOs as actors of governance and accountability: this priority area will support CSOs in their efforts to strengthen democratic governance, to promote transparency and accountability of decision making, policy implementation and empowerment of the stakeholders concerned.”*³⁵¹.

The review of EU projects implemented in 2013-2015 identified examples of Russian NGOs funded by EU being blacklisted as Foreign Agents by Russian authorities. These NGOs now face an array of challenges, up to and including criminal charges in the most serious case, as a result of this status.

Indicator 1.2b	The appropriateness of choice of implementation modalities
<p>In the case of Russia, targeted support to civil society is channelled via grants, implemented via Calls for Proposals.</p> <p>The requirements of EU Calls for Proposals can be seen, in the opinion of the current report, to act as barriers for ensuring direct uptake of EU funding among small CSOs, as well as other than CSOs civil society actors such as trade unions, not-for profit associations etc. In order to be successful in receiving an EU grant, an applicant has to understand how to formulate a log frame, or design a project workplan. The presence of such skill sets is less salient among civil society actors other than CSOs who are more familiar with the requirements of foreign grants. According to the external evaluation of the IBPP Programme, none of the applications received from trade unions or business associations were selected under the 2006 Call due to their perceived low quality, and in fact, these groups of actors were removed from the list of eligible actors in subsequent calls³⁵².</p> <p>Another barrier to the EU support delivered via grants relates to the financial requirements of EU funding. The EU Calls for Applications require a significant amount of co-funding (5-10%) of the total amount of the grant. As the EU grants have increased in size (500,000-1,000,000 Euro), the accessibility of EU grants is becoming more limited to the small pool of the biggest organisations. This trend is reflected in the consensus among both EU-Russia CSF members and Russian respondents to the civil society survey, who noted that EU grants are too large and accessible only to large organisations. As one respondent summed up: <i>‘I think that there</i></p>	

³⁴⁹ Approach is outlined in the EU ‘Non-Paper’ on Strengthening the Civil Society Dimension of the ENP’

³⁵⁰ European Instrument for Democracy and Human Rights (EIDHR): Country-Based Support Scheme (CBSS) 2013 for Russia, Guidelines for grant applicants,

Reference: EuropeAid/2013/135185/L/ACT/RU

³⁵¹ Country Based Support Scheme for Russia, Guidelines for grant applicants, Budget line 21.02.08.03, Decision DCI-NSAPVD/2014/037625, 12 May 2015

³⁵² External evaluation of the Institution Building Partnership Programme in Russia, 2011, p 6

has been insufficient adaptation. The EU continues to support only large, institutional structures [in the civil society sphere], which accordingly fall under the purview of the Law on Foreign Agents. Meanwhile, the main growth in civil society development in Russia is taking place among small organisations and grassroots initiatives.'

The EU had been increasingly encouraging re-granting in order to address the issue of accessibility to EU funding. However, in recent years, it has become more difficult to implement sub-granting, as authorities require that local/small NGOs declare whether their partners are funded by foreign donors. For instance, in one project a solution was found to distribute funding to physical persons not legal entities, but this solution required a lot of negotiation with EUD Moscow to allow for necessary amendments of financial procedures. The EU has gradually introduced a range of amendments to grants' eligibility requirement to include commercial organisations, individuals, etc., as a way of adaptation to the Russian context.³⁵³

One Russian respondent to the civil society survey summed up this latest trend: *'In my opinion, EU support has been partially adapted – it is continuing, grants can be accessed by CSOs and civic initiatives that have re-registered as commercial organisations because of the Law on Foreign Agents.'* However, the support is not enough to meet the needs of civil society – the grants are too large, and support is concentrated too much on the theme of human rights, whereas it would be important to support key issues in other spheres.'

There is a scope and need in the Russian case, in the view of the current report (based on the feedback received to date), to explore and expand the use of modalities of support other than the provision of grants. This can include support delivered, for instance, via regional initiatives. E.g. the Prague Centre in collaboration with the Neighbourhood East Civil Society Facility organised a regional hackathon in Kyiv, where representatives of civil society and IT communities from the former Soviet Union including Russia were able to network and share experience. The Eastern Partnership Civil Society Facility offers a model of alternative modalities of support to civil society that could be appropriate in the Russian context.

Indicator 1.2c	The appropriateness of forms of engagement with civil society (targeted support, mainstreamed support, policy dialogue)
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In the period 2009-2011 the EU was able to leverage its support to Russian civil society through the three forms of support as well as political support in the least contested manner. This was due to a relatively more benign legal environment within which Russian civil society had to operate and a more cooperative nature of EU-Russia relations, exercised through the Partnership for Modernisation Framework. For instance, the IBPP programming was aligned not only with the EU but also with the priorities set by the Russian Government.

Prior to 2014, and in particular in between 2009-2012, the EU played an active role in stimulating a policy dialogue in Russia, e.g. through the organisation of annual human rights conferences that brought together Russian authorities, representatives of civil society as well as donor community to discuss the achievements of EU-funded initiatives and showcase the EU support to civil society in Russia. The EU was also able to leverage its support via the conduct of regular Human Rights Consultations with the Russian Government, as well as joint workshops between the European Economic and Social Committee (EESC) and the Civic Chamber of the Russian Federation (CCRF).

With regard to the mainstreaming of civil society support, civil society had always been involved in consultations during the identification phases of programming of EU assistance across all sectors of support.³⁵⁴ However, as EU-Russia bilateral assistance stopped in 2011, this should be seen as a reduction in opportunities for the EU to mainstream civil society. This has become even more pertinent since 2014.

As discussed above, the delivery of financed support to civil society has been experiencing increasing challenges since 2014, due to the efforts of Russian authorities that were aimed at curtailing foreign aid provision for Russian NGOs tackling the contested areas of public life in Russia. Within this context, the EU support provided via multi-country initiatives should be regarded as of increased salience.

³⁵³ Some NGOs chose to re-register as commercial organisations in responses to getting blacklisted as Foreign Agents

³⁵⁴ From feedback provided by EU staff.

The EU support to the EU-Russia Civil Society Forum, the initiative that emerged as a grass-root development, helps to promote the links among Russian and EU stakeholders in the sphere of civil society. This initiative is in particular pertinent given the hostile environment within which Russian and foreign NGOs are forced to operate, and which has increasingly acted as a barrier to cooperation. The work of the EU-Russia Civil Society Forum is also indispensable in providing a platform for a policy dialogue between Russian civil society, foreign donors, EU bodies in the context where opportunities for a policy dialogue inside Russia had diminished significantly over the recent years. While the joint workshops between the EESC and CCRF ceased, the interaction between the Forum and the Council continued post 2014. One of the consequences of the EU-Russia Civil Society Forum being a grass-root initiative, is that the EU has less influence over its shape and operations (as opposed to the Eastern Partnership Civil Society Forum). EU-Russia CSF staff and members confirm the Forum is currently at the crossroads (deciding on its future strategy post-2020) and needs strong and stable EU support (funding and capacity-building) to further strengthen its operations.

Russian survey respondents stress that EU support to Russia civil society is most pertinent, despite (and because of) the current hostile environment. Within this the respondents see a heightened salience for a political dialogue and engagement between the EU and the Russian government, including the involvement of the European Parliament. EU-Russia CSF members also noted the importance of combining civil society support activities with broader political involvement combining the efforts of the EU, EU Member States and their embassies in Russia.

Indicator 1.2d

Consultations with civil society actors and organisations were used to inform the evolution of EU approaches

The programmatic level documentation refers to the consultations with civil society actors and organisations. For instance, the NSA-LA programmatic documentation indicates that a 14-month consultation period was conducted with the involvement of a broad range of civil society stakeholders for the purpose of identification and formulation of the 2014 Programme. At the country level, the EUD conducts further consultations in order to render Calls for Proposals relevant for the needs of local contexts. The main consultation is with the EU-Russia Civil Society Forum, which brings together up to 180 Russian and European CSOs. Some Russian respondents to the civil society survey for this evaluation and some EU-Russia CSF members raised some concerns, however, about the scope and nature of such consultations. They expressed the opinion that EUD Moscow consults with a narrow circle of the same stakeholders, thus rendering the consultation process very limited in its coverage. They also feel that the nature of such consultations can be, at times, formalistic. On the same subject, EU staff noted that it is obviously not possible to reflect the priorities of all consulted CSOs into Calls for Proposals. One CSO respondent recalled an instance where s/he felt that the views of key stakeholders were not heeded to in the subsequent decision. In order for the evaluation to be in a position to verify the extent to which civil society consultations are inclusive and responsive to civil society's viewpoints and concerns, it would have been necessary to review a sample of minutes of such consultations and any other relevant documentation, such as needs assessments, etc., but it was not possible to retrieve them.

EQ2 (Efficiency): To what extent has the scale of resources deployed been justified considering the changes/results produced? To what extent have efficiency gains, or losses, occurred?

Judgement Criterion 2.1: The scale of resources deployed for targeted support has been appropriate in Russia

The case of EU support to Russian civil society stands in contrast with EU support to civil society in the Neighbourhood and Enlargement as the scale of resources deployed by the EU represents a very limited coverage in terms of the number of projects and organisations funded annually, cf. the size of Russian civil society³⁵⁵ or cf. the funding provided by Russian government to Russian NGOs³⁵⁶. With regard to the former, the numbers of funded projects per individual Call varied from

³⁵⁵ The number of registered NGOs grew from circa 60,000 in 2006 to circa 200,000 in 2018. The number of NGOs actively working constitutes 20,000-30,000 (10-15% of the registered total).

³⁵⁶ According to the External Evaluation of EIDHR, 2008, for instance, in 2008, the Public Chamber of the Russian Federation allocated an amount of 200 million RUB (equivalent to € 5.7 million) to NGO activities in the sphere of human rights and legal education cf. the 2008 EIDHR allocation of € 1.2 million in the same year, External Evaluation of EIDHR, 2008, p. 4.

4 to 19 across the period, with recent tendency of awarding as few as 4 EIDHR projects per year, due to the enlarged size of the EIDHR grants. Within this limited scale, direct recipients of EU grants are international and Russian CSOs.

Indicator 2.1a	Extent to which the choice of modality, and their mix, led to increased outreach to grass-root organisations
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In the case of Russia, EU targeted support to civil society is primarily channelled via grants, implemented via Calls for Proposals

The scale of resources deployed by the EU represents a very limited coverage in terms of the number of projects and number of organisations funded annually under each Call, cf. the size of Russian civil society³⁵⁷. With regard to the former, the numbers of funded projects per individual Call varied from four to 19 across the period. Although an option of covering 100% of the project cost was introduced several years ago, this option has yet to have been taken up by grantees.

The Russian government is the largest funder of Russian NGOs³⁵⁸. For instance, in 2008, the Public Chamber of the Russian Federation allocated an amount of 200 million RUB (equivalent to € 5.7 million) to NGO activities in the sphere of human rights and legal education cf. the 2008 EIDHR allocation of € 1.2 million in the same year.³⁵⁹

With regard to the outreach and diversification, EU support, in particular prior to 2012, allowed for a wide geographical outreach cf. its very limited scale. Projects supported by the EU reached out to beneficiaries and stakeholders located as far as the Far East, Northern parts of Russia, as well as the Republics of Chechnya, Dagestan, and Ingushetia.

Documentary review shows that in between 2007-2011, EU-funded projects were able to build partnerships with grass root/local organisations, as well as local authorities, governmental bodies, including prison administrations, police, health services, in the case of the EIDHR. The IBPP, according to the external evaluation of IBPP, achieved good partnerships between CSOs and local authorities, but was less successful in achieving outreach to business communities and mass media.

Post-2012, it has been increasingly more difficult to achieve outreach and diversification as the hostile environment inside Russia generated pressures and disincentives for small organisations, local authorities, as well as other stakeholders against the involvement with the EU-funded activities. On one occasion, for instance, an uninvited crew of journalists showed up at a seminar organised as part of an EIDHR project. This crew attempted to intimidate seminar participants by shaming the organisers of the seminar for their foreign funding connection.³⁶⁰ EUD Moscow now practises a waiver of the EU visibility rules for the conduct of seminars and other outreach activities.

Indicator 2.1b	Extent to which pooling of resources has been utilised to achieve cost-effectiveness
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Throughout the period 2007-2018 the requirements for co-funding in the amount of 5-10% in the case of Russian CSOs remained. Prior to 2012, this was easier for Russian CSOs to achieve, through either receiving state funding (Federal or regional grants), funding from local authorities, or other foreign funders. Post-2012, such sources of additional funding have become more inaccessible. There has been a rise in alternative sources of funding, such as public, private donations, crowdfunding in general available to Russian civil society. It is less evident whether these sources are available to those organisations who work in the spheres falling under label of undesirable “political activity”.

The enlargement of EU grants seen in the recent years also acts as a constraint as it translates in a higher financial commitment requirement for CSOs seeking EU support. . Although an option of covering 100% of the project cost was introduced several years ago, this option has yet to have been taken up by grantees.

³⁵⁷ The number of registered NGOs grew from circa 60,000 in 2006 to circa 200,000 in 2018. The number of NGOs actively working constitutes 20,000-30,000 (10-15% of the registered total).

³⁵⁸ External Evaluation of EIDHR, 2008, p. 4

³⁵⁹ External Evaluation of EIDHR, 2008, p. 4

³⁶⁰ EU internal monitoring report

Indicator 2.1c	Extent to which considerations of cost-efficiency played a role in the use of available instruments (geographical and thematic) and aid modalities
<p>The evaluation did not have access to documentation that would allow for the assessment of this indicator at the level of instruments or modalities. According to the feedback provided by EUD Moscow, consideration of cost-effectiveness is an important consideration at the level of EU instruments and modalities, but it is not the main factor influencing choice of modality.³⁶¹ The review of available documentation has confirmed that cost-efficiency is systematically monitored by EUD Moscow at the level of individual projects as discussed below.</p>	
Indicator 2.1d	Extent to which efficiency gains, or losses, have occurred
<p>Analysis of EU-funded projects implemented prior to 2012 indicates that, on the whole, projects were delivered efficiently. There are instances where projects did not manage to raise co-funding to the full extent, which resulted in the delivery of a reduced programme of activities. There are also cases where projects managed to attract additional funding, e.g. from local authorities that allowed for an expanded programme of activities to take place.</p> <p>Since 2012, EU-funded projects increasingly experienced difficulties in the course of their implementation³⁶², due to the worsening of the external environment. In one case, staff of a foreign NGO could not receive Russian visas in order to deliver a planned programme of training, which resulted in a negative knock-on effect on the project. The implementing organisations of this project were contemplating its termination, but as they saw very strong demand among beneficiaries, they decided to continue with the implementation. A number of projects experienced difficulties caused by the need to re-configure their partnerships, as some organisations had to go into self-liquidation in their response to being blacklisted as Foreign.</p> <p>There is no consensus among interviewees regarding the extent of these challenges. To give an example, some CSO respondents reported that the state authorities forced an EIDHR funded project to terminate its activities and prevented an independent evaluation from conducting the planned review of this project. The implementing NGO was blacklisted as a Foreign Agent and had consequently changed its legal status. On the other hand, one EU staff told the evaluation team that no CSO actions in Russia were terminated or suspended due to unavailability of co-funding, no projects were terminated or suspended for political reasons and that in all cases of difficulty some way was found to ensure that the action could continue.</p> <p>The evidence also indicates that Russian CSOs have increasingly experienced problems with either outreach or re-granting. In one case known to the evaluation, small/grassroots organisations were only prepared to accept funding distributed via re-granting as physical persons not as organisations, due to their unease of possible exposure. Russian authorities require CSOs to report whether their partners receive foreign funding, however they did not require - at the time of the implementation of this particular project - physical persons to report connection with foreign funding. Pursuing this loop-hole, however, required negotiating a permission of the EUD Moscow for relaxing the eligibility rules and allowing re-grating to physical persons.</p>	
Indicator 2.1e	Extent to which institutional capacity of partner organisations was assessed at programming, implementation and monitoring stages
<p>EU requirements with regard to institutional capacity of partner organisations, applying for EU grants in the framework of Calls for Applications, are set high, e.g. EU Calls for Proposals are based on prerequisites of strong co-funding capacity of NGOs. Strong co-funding capacity predetermines a strong institutional capacity of NGOs, given the sizes of EU grants as discussed elsewhere in the current report. The nature of competition for EU funding in terms of demand is also high. In one year, for instance, the ratio between grant applications and awards was 10 to 1³⁶³. These factors serve to ensure strong institutional capacity of EU grantees, on the one hand, but they also result in a low accessibility of EU funding among the majority of Russian CSOs, as remarked by one of the respondents to the civil</p>	

³⁶¹ Interview with a representative of the EUD Moscow

³⁶² External Evaluation of the EIDHR CBSS for Russia, 2015; Documentary review of the sample of projects.

³⁶³ Interview with a representative of EUD Moscow

society survey: *'The conditions of the grant competition are such, that the majority of NGOs, particularly those who represent groups whose rights are the most violated, do not have any chance of receiving EU grants.'*

It is interesting to note that most EIDHR grantees in Russia are Russian CSOs or EU-based CSOs established by Russian physical persons-activists.

Indicator 2.1f	Extent to which monitoring and other mechanisms are deployed in order to ensure cost-effectiveness of targeted support
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The review of the sample of the projects demonstrated that projects are monitored or evaluated independently on a sample basis. The monitoring covers issues relating to relevance and quality of design, efficiency, effectiveness, prospects for impact and sustainability, as well as issues arising and challenges encountered. Select projects are also monitored by EUD Moscow directly through, e.g. the attendance of the activities organised by projects.

Judgement Criterion 2.2: The scale of resources deployed for mainstreamed support has been appropriate in Russia.

The current evaluation could not assess the scale of EU resources deployed for mainstreamed support due to the gaps in evidence. The available ROM, evaluation reports do not contain details relating to the assessment of mainstreaming of civil society. EU-Russia CSF members interviewed and Russian respondents to the civil society survey conducted by the current evaluation reported no direct experience or knowledge of EU mainstreaming of civil society.

Indicator 2.2a	Extent to which monitoring and other mechanisms are deployed in order to ensure cost-effectiveness of mainstreaming activities
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Cost-effectiveness is a cross-cutting consideration in the work of EUD Moscow, according to the feedback received from EUD Moscow. According to EUD Moscow, the process of identification of interventions always involves consultations with civil society representatives across all sectors. The available documentary evidence did not contain details in order to independently verify this indicator.

Indicator 2.2b	Extent to which institutional capacity of partner organisations was assessed at programming, implementation and monitoring stages
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The available documentary evidence did not contain details in order to independently verify this indicator.

Judgement Criterion 2.3: The scale of resources deployed for policy-level engagement has been appropriate in Russia

The current evaluation could not assess the scale of EU resources deployed for policy-level engagement due to the gaps in evidence. By agreement with the EU, very limited interviews were carried out with Russia-based stakeholders.

Indicator 2.3a	Extent to which considerations of cost-efficiency played a role in the organisation of policy-level engagement activities
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According to the feedback received from EUD Moscow, cost-effectiveness is a cross-cutting consideration in the work of EUD Moscow. The available documentary evidence did not contain details in order to independently verify this indicator.

Indicator 2.3b	Extent to which monitoring and other mechanisms are deployed in order to ensure cost-effectiveness of policy-engagement activities.
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According to the feedback received from EUD Moscow, cost-effectiveness is a cross-cutting consideration in the work of EUD Moscow. The available documentary evidence did not contain the required details in order to verify the extent to which monitoring and other mechanisms are deployed in order to ensure cost-effectiveness under this indicator.

EQ3 (Effectiveness): What have been the effects of the EU's various forms of engagement with Civil Society in Russia?

Judgement Criterion 3.1: The effects achieved through the targeted support to civil society have corresponded to the EU's initial objectives in Russia

Indicator 3.1a Aggregate achievement of short/mid-term results within targeted support

The current review concludes that prior to 2012, EU support provided through the targeted form of engagement, such as the EIDHR Programme, IBPP Programme, was effective in achieving its intended objectives. The focus of EU support on partnership building helped Russian CSOs to establish partnerships both within Russia (geographically, thematically) as well as with their European counterparts. These partnerships in turn allowed for the sharing of approaches, methodologies, tools, good practices, awareness-raising within broader civil society community, as well as among general public and local authorities.

A built-in focus on a multiplier effect within EU support contributed to the capacity development and professionalisation of the work of CSOs beyond the boundaries of individual projects. A combined effect of EU support allowed to address most pertinent challenges present in the Russian society in the sphere of human rights, such as the violation of human rights in prisons and military barracks, the rights of minority groups, children, women and the disabled., etc. Capitalising on the convergence of interests among civil society, public bodies, authorities and the general public brought about the strongest achievements resulting in strengthened reputation of CSOs among local authorities, public institutions, and their communities.

EU support allowed CSO to achieve tangible outcomes for Russian individuals, communities, public institutions, local authorities, including the outcomes achieved at the federal level. For instance, as a result of an EIDHR project that targeted abuse of human rights in prisons, including torture, victims were able to receive compensation from the State, and a number of perpetrators were brought to justice³⁶⁴. In another case an IBPP-funded project implemented a range of activities resulting in reducing re-offending among young people, which garnered strong support from police.³⁶⁵ An example of a “buy-in” at the federal level can be illustrated by the outcome achieved by another IBPP project whose lobbying efforts resulted in including an issue onto the State Duma Committee Agenda³⁶⁶.

However, as discussed above, since 2012 it has become increasingly difficult for Russian CSOs to implement EU funded projects, given the persistence of Russian authorities in their smear and criminalisation campaign against foreign funded NGOs working in contested areas related to civic and political activism. In contrast to the earlier period, where projects were successful in forging multi-stakeholder partnerships, the post 2012 period saw a reversal of this trend. According to the observation made in 2015 by the evaluation of the EIDHR Programme, “*A real problem for all projects has been partnership with the authorities and/or involvement of government stakeholders. Projects which were earlier supported by the local authorities for example, and had established good partnerships, were challenged by a new hostile attitude after the law [on Foreign Agents] was adopted and the local authorities have suddenly decided to withdraw support...*”³⁶⁷

Despite the hostile climate and difficulties in implementation, EU support continued to focus on sensitive areas such as LGTB rights, the rights of conscripts, fight against corruption, etc. Notwithstanding the difficulties encountered in implementation, some EU funded projects had, nevertheless, produced anticipated

³⁶⁴ Review of documentation relating the sample

³⁶⁵ External evaluation of the Institution Building Partnership Programme in Russia, 2011, p.23

³⁶⁶ External evaluation of the Institution Building Partnership Programme in Russia, 2011, p.33

³⁶⁷ External Evaluation of the EIDHR CBSS for Russia, 2015, p. 33

outcomes, including in the areas contested by the State, albeit at a price for the organisations involved in these projects, as described elsewhere in the report. Where the projects managed to succeed in achieving results, they did so through incorporating new innovative approaches, e.g. use of 'non-threatening' media such as comics in awareness raising campaign about human rights, use of IT and online tools in creating online platforms for monitoring violations relating to, e.g. corruption cases, or abuse of human rights, as well as for communicating with the public.

In terms of maintaining the space for networking among NGOs and with broader range of stakeholders, the work of the EU-Russia Civil Society Forum served as an important conduit of activities aimed at promoting cooperation among European and Russian CSOs as well as a platform allowing Russian NGO community to engage with other international stakeholders. All EU-Russia CSF Members interviewed confirmed the importance of the Forum as a dialogue platform and the need for mobility opportunities and exchange of experiences between EU and Russian CSOs. The regional initiatives, such as the Black Sea NGO Forum, co-funded by the EU in the framework of Black Sea Synergy, provided an additional engagement with Russian civil society, facilitating the interaction of Russian NGOs with their counterparts in the former Soviet Union and Western Europe.

The evaluation was not able to assess the achievements of EU support delivered via the EED as the EED website does not list Russia as a country that receives its support (due to the sensitivity of the subject matter) and no other information was made available to the evaluation.

Judgement Criterion 3.2: The effects achieved through the mainstreamed support to civil society have corresponded to the EU's initial objectives in Russia

Indicator 3.2a	Sectoral achievement of short/mid-term results within mainstreamed support
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The termination of EU bilateral assistance to Russia in 2011 and curtailing of EU-Russia relations post 2014 has had a significant effect on the potential for mainstreaming of civil society in EU funded interventions. EUD Moscow always involved civil society in the process of identification of EU interventions (mainstreaming). However, the available ROM, evaluation reports, EU-Russia Common Spaces Progress Reports do not contain details relating to the assessment of mainstreaming of civil society. EU-Russia CSF Members interviewed as well as Russian respondents to the civil society survey conducted by the current evaluation reported no direct experience or knowledge of EU mainstreaming of civil society.

Indicator 3.2b	Extent to which the EU strategic approach and related guidelines and tools to deal with CS mainstreaming were appropriate.
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The EU seeks a mutually beneficial relationship with Russia based on common values and international commitments. Russia is a high-income country, and there is no basis for development cooperation. There is a modest bilateral programme under the Partnership Instrument. The EU also operates the EIDHR thematic programme. This programme is used to address a wider range of themes than in some higher income countries, EIDHR funds are used only for limited themes, such as the death penalty.

Until 2014-15, the EU, together with the few MS that continued to offer bilateral funding, had an ambitious vision of civil society support, including extensive, geographically and thematically broad consultation and funding support. This support focused on grant-based "NGOs", particularly those focusing on governance, human rights themes and anti-discrimination themes. There was rather less attention to other sectors of civil society, some of which may have been perceived as overly close to or influenced by the Russian authorities. The evaluators did not identify documents that indicate any significant exploration of opportunities for constructive engagement with the Russian authorities. The years covered by this evaluation were in any case characterised by an increasingly unfavourable operating environment for foreign-financed CSOs in particular. The evaluators did not identify documents that suggest any significant EU focus on funding diversification and constituency building in civil society. The provision of grants became increasingly difficult, as noted in Chapter 4 of this evaluation report.

Dialogue with the Russian authorities on themes relating to civil society became increasingly difficult in the early years of the period covered by this evaluation, and remained at a minimal level for most of the period examined. The EU monitored cases of concern and brought some issues to the attention of the local

counterparts. However, there were no identified opportunities for multi-stakeholder forums or pilot projects that could facilitate building of relationships or confidence between Russian authorities and elected representatives on the one hand, and Russian civil society on the other.

In 2013-2015, the EU contracted only limited funds to cooperation with Russia. However, 90% of these EU funds represented targeted and mainstreamed support to civil society. This support was mostly targeted, reflecting the main sources of funding made available – country allocations under EIDHR. These years were characterised by a decline in the legislative, regulatory and political environment for civil society after 2012, and an increasingly frosty relationship between the EU and Russia.

The pattern of contracting of EU cooperation funds changed in 2015-2016. There was a collapse in funds contracted to actions supporting CSOs alongside a significant increase in other forms of EU cooperation with Russia. This reflects challenges in contracting funds related to the worsening environment for Russian CSOs and international CSOs working in Russia, alongside an expansion of other forms of cooperation.

The evaluators note that within the thematic budget lines a significant amount has been indicatively committed to Russia in 2018-20. This may re-establish civil society support as a significant proportion of EU cooperation with Russia. This would seem to depend primarily on the constraints of the operating environment, and the ability of Russian civil society and their allies to negotiate these challenges.

As noted in the February 2019 Progress Report “As requested by EUD Moscow, the evaluation team has not reached out to beneficiaries of EU support, in line with concerns over the safety of these civil society representatives – the repressive measures adopted by the Russian authorities mean that civil society respondents would take a risk in sharing opinions with an evaluation team working on behalf of the European Commission (and restrictive measures also apply to foreign actors). The documentation made available for the already limited sample of interventions (cf. the regional matrices) has also been limited in scope. This results in a significant evidence gap for the current evaluation, which mediating measures can only address to a limited extent.” It could also be noted in this respect that the RoadMap for engagement with civil society in Russia is restricted: no RoadMap or public summary is available.³⁶⁸)

Judgement Criterion 3.3: The effects achieved through policy-level engagement with civil society have corresponded to the EU's initial objectives in Russia

Indicator 3.3a	Aggregate achievement of short/mid-term results within policy-level engagement
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The review of the EUD Moscow website demonstrates that EUD was most active in organising human rights conferences bringing together representatives of Russian civil society, governmental bodies, as well as other international donors in the period prior to 2012. Post-2012, as the situation of Russian CSOs deteriorated due to shrinking space for civil society, such information is not available to the public for safety reasons. EU staff confirmed to the evaluation team that locally appropriate consultations have continued, without a negative impact on the Russian civil society participants.

Russian respondents to the civil society survey noted a limited scale of involvement of civil society in policy dialogue organised by the EUD Moscow, remarking that: *‘The EUD prefers to organise such dialogues only among a very narrow circle of representatives of Russian civil society. As a result the majority of NGOs, including ours, do not know much about such initiatives.’*

The deterioration of relations between Russia and the EU in 2013-2014 led to the rolling back of activities relating to policy dialogue between EU and Russian civil society, as summed up by one of the respondents to the survey: *‘There was a reduction in the number of such dialogues, and from 2014 on we cannot really talk about achievements of such events.’*

In this context, EU support to the EU-Russia Civil Society forum is very important as it allowed for the dialogue between Russian CSOs and European stakeholders to continue. For instance, while regular joint workshops on human rights issues between the European Economic and Social Committee (EESC) and the Civic Chamber of the Russian Federation (CCRF) ceased after 2014, the interaction between the EU-Russia Civil Society Forum and the EESC continues through the

³⁶⁸ <https://europa.eu/capacity4dev/public-governance-civilsociety/wiki/roadmaps>

conduct of joint seminars that allows participants to discuss developments within the civil society sphere both in Russia and the EU, as well as other issues, for instance the 3rd meeting of the joint seminar conducted in November 2016 was dedicated to the discussion of migration policies as well as the situation with civil society in Russia and EU³⁶⁹. According to feedback received by the ET, however, it has become increasingly more difficult for Russian CSOs to find partners in EU countries, because of the worsening of EU-Russia relations.

EQ4 (Impact): To what extent have the EU's various forms of engagement with Civil Society in Russia contributed to the enhancement of participatory and inclusive democratic governance?

Judgement Criterion 4.1: EU's engagement with civil society has contributed to the increased capacity of civil society organisations and actors to perform their roles as independent development actors.

Indicator 4.1a	Aggregate achievement of long terms results delivered through targeted support
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2007-2012

Documentary review of EU targeted support covering the period prior to 2012 identified evidence relating to actual or potential impact of EU- funded projects. Impact has been seen at individual, institutional, societal/attitudinal levels.

The IBPP Programme enabled CSOs to perform their role as independent development actors in the spheres relating to children's, women's rights and the rights of people with disabilities and achieve impact in these areas. According to the conclusions of the external evaluation, *"It has done this by developing models or approaches of inclusiveness of vulnerable citizens and responsiveness within local social service provision in Russia. Some of these models or approaches have been taken up by the local agencies and some have fed into policy making at oblast level"*³⁷⁰. The standing and credibility of NGOs was also enhanced among local communities and authorities who appreciated the level of professionalism of IBPP-funded organisations. The awareness raising activities brought about changes in societal attitudes, e.g. towards people with disabilities, and sensitised communities and authorities with regard to the needs and rights of disadvantaged groups thus making a positive contribution to the nature of inclusivity in communities involved in the work of IBPP funded projects.

EU support provided via the EIDHR Programme strengthened the work of CSOs working in the sphere of human rights addressing the most difficult areas that traditionally had been closely guarded by the State against influences from the outside of the governmental realm. As a result of activities funded by the EIDHR, Russian citizens were able to get access to legal aid and seek redress against violation of their human rights. The combined weight of the contribution made by the EIDHR programme made it possible for the CSOs to contribute to the public debate and oversight of human rights issues, despite a lack of cooperation by state bodies.³⁷¹

Post-2012

As discussed throughout the current report, Russian state authorities intensified their efforts aimed at curtailing civic and political participation of Russian citizenry, and in particular of those civil society actors who voiced their criticism of the Russian government policies and practice. Part of this clampdown campaign was a focus on foreign funding that supported Russian CSOs in pursuing their roles as active development actors. As this report indicates, a number of Russian CSOs were blacklisted as Foreign Agents for their work funded by the EU. This status severely limits the ability of Russian CSOs to implement their agendas. As noted

³⁶⁹ <https://www.eesc.europa.eu/agenda/our-events/events/3rd-joint-seminar-between-eesc-and-eu-russia-civil-society-forum>

³⁷⁰ External evaluation of the Institution Building Partnership Programme in Russia, 2011, p. 5

³⁷¹ External Evaluation of EIDHR, 2008, p. 27

earlier, an association with foreign funding acts as a strong disincentive for broader community of stakeholders, including partner organisations, governmental bodies and institutions, authorities against their involvement in activities funded by the EU.

An interesting finding provided by evidence in feedback and ET observations relates to the contributions made by Russian civil society actors, as current or previous recipients of EU funding, to activities in other countries, including the Neighbourhood East region, and also through exchange of good practice with counterparts in EU Member States.

Indicator 4.1b	Aggregate achievement of long terms results delivered through mainstreamed support
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Given the negligent scale and nature of this form of support, in particular since 2012-2014, it is not realistic to anticipate impact in the context of the prevalent restrictive environment.

Indicator 4.1c	Aggregate achievement of long terms results delivered through policy-level engagement
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Given the negligent scale and nature of this form of support, in particular since 2012-2014, it is not realistic to anticipate impact in the context of the prevalent restrictive environment.

Judgement Criterion 4.2: EU's engagement with civil society has contributed to the promotion of conducive environments for CSOs and broader civil society actors.

Indicator 4.2a	Aggregate achievement of long terms results delivered through targeted support
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Prior to 2012, tangible positive impact was seen primarily at the level of local communities. As noted in the external evaluation of IBPP report, a representative of one of the CSOs implementers of an IBPP funded project conveyed to the evaluators of the IBPP Programme that, '*Now we can no longer say the authorities ignore us*³⁷². Similar positive feedback was received from local authorities who appreciated their partnership with CSOs as CSOs were seen as being close to local communities.³⁷³ Another sign of positive change in terms of conducive environment could be seen in instances where local authorities stepped in through the provision of additional funding for the work of CSOs. Or in the case of some EIDHR projects, a number of CSOs that received capacity development training in human rights issues, later were able to get funding from the State funding sources in order to continue with human rights related work.

The period post-2012, however, has seen a reversal of this trend, as result of Russian authorities clamp down on the foreign funded NGOs. Nevertheless, there have been some successes in engagement with Russian authorities, including in important and sensitive issues such as penitentiary reform, and rights of military conscripts.

Indicator 4.2b	Aggregate achievement of long terms results delivered through mainstreamed support
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Given the negligent scale and nature of this form of support, in particular since 2012-2014, it is not realistic to anticipate impact in the context of the prevalent restrictive environment.

³⁷² External evaluation of the Institution Building Partnership Programme in Russia, 2011, p. 45

³⁷³ External evaluation of the Institution Building Partnership Programme in Russia, 2011, p. 6

Indicator 4.2c	Aggregate achievement of long terms results delivered through policy-level engagement
Given the negligent scale and nature of this form of support, in particular since 2012-2014, it is not realistic to anticipate impact in the context of the prevalent restrictive environment.	
Judgement Criterion 4.3: EU's engagement with civil society has contributed to the promotion of structured participation of CSOs and civil society actors in domestic policies, in EU programming cycles and internationally	
Indicator 4.3a	Aggregate achievement of long terms results delivered through targeted support
Notwithstanding the limited scale of EU support in terms of the number of CSOs supported, it has helped Russian CSOs to tackle "hard to reach" issues such as violation of human rights in Russian prisons or military barracks, or address areas of contention such as domestic violence, LGBT rights, freedom of mass media, corruption, etc. Russian CSO community was able to succeed in shaping domestic policy agendas and influencing public debate, e.g. in relation to the adoption of the Law on Alternative Military Service, raising the salience of domestic violence in the public debate. However, as the efforts of the Russian government to "disable" civil society intensified, it has become increasingly more difficult for the Russian CSO community and ordinary citizens to get involved in a policy sphere in a meaningful way.	
Indicator 4.3b	Aggregate achievement of long terms results delivered through mainstreamed support
Given the negligent scale and nature of this form of support, in particular since 2012-2014, it is not realistic to anticipate impact in the context of the prevalent restrictive environment.	
Indicator 4.3c	Aggregate achievement of long terms results delivered through policy-level engagement
Given the negligent scale and nature of this form of support, in particular since 2012-2014, it is not realistic to anticipate impact in the context of the prevalent restrictive environment.	

EQ5 (Sustainability and Ownership): To what extent have the changes to which EU support have contributed proved to be sustainable after the end of EU funding?

Judgement Criterion 5.1: The results achieved through the EU's support and engagement with civil society allow the beneficiary organisations and actors to continue to operate as effective actors in the civic and governance realms.	
Indicator 5.1a	Extent to which the capacities developed under EU support are sustained.
Notwithstanding its relatively limited scale with regard to the numbers of Russian CSOs supported, the EU has been providing sustained support to Russian civil society since 1990s. It has contributed to the development of expertise and professionalisation of the Russian civil society sector through the provision of financed and non-financed support, including grants as well as networking opportunities.	

For the purpose of this evaluation, a tracer study was conducted of a sub-sample of EU-funded grantees, through an internet-based review in order to assess the nature of sustainability. It has identified cases where the EU grantees had continued to operate as HR defenders, campaigners, and/ or providers of services to the Russian public and retain the thematic focus of their work post- EU funding in the **civic** domain.

In addressing the question of sustainability of capacities developed under EU support, the Russian respondents to the survey of civil society expressed no unanimity of opinion, partly due to the limited direct experience of receiving EU support. According to some respondents, there are some signs of sustainability at the individual or organisational level in terms of acquired expertise and capacity, especially among the strongest actors.

However, the current unfavourable environment within which foreign-funded NGOs have to operate has negatively impacted on the NGOs' relationships with state bodies and authorities. As one respondent summed up, there is a lack of willingness among Russian authorities in utilising the skills and knowledge of NGOs.

At the time of writing of the current report, the Russian government policy of targeting the Russian NGOs for their association with foreign donors, seen since 2012, has brought not only serious risks with regard to NGOs' sustainability, but also a risk of criminalisation of individual civil society actors.

Documentary review of the sample has shown that a number of EU grantees were registered as Foreign Agents while implementing EU funded projects. The registration of an NGO as a Foreign Agent creates a range of barriers for the work of NGOs. Some NGOs chose self-liquidation. In those instances where EU grantees chose to continue to operate as a Foreign Agent, the review identified cases where NGOs face further punitive measures- e.g. being fined for non-compliance with the procedures associated with the Foreign Agent status. In the worst scenario, there is currently a case of criminal charges brought against a head of an NGO, a grantee of EU funding, for the violation of the 'foreign agent' law with a prospect of receiving up to six years of imprisonment.

EU staff told the evaluators that most CSO grantees of the EU had not been classified as foreign agents as a direct result of their EU funding not consistent.

Indicator 5.1b

Extent to which the achievements seen in creating an enabling environment for civil society are sustained

Within the period under evaluation, the most favourable legal environment governing CSOs activities in Russia was observed between 2009-2011 marked by the amendments introduced into the Russian Law on NGOs³⁷⁴ under the then President of the Russian Federation, Dmitry Medvedev. During this period EU-Russia relations were shaped by a relatively more positive mutual willingness to cooperate, and the EU-Russia regular political dialogue contributed to the enabling environment for civil society during that time.

However, the restrictive package of legislation introduced from 2012 to 2018 had sought to reverse the trend seen in earlier years³⁷⁵. The deterioration in political relations between the EU and Russia seen since 2013 has contributed to the EU's reduced leverage over the developments in the civic sphere in Russia.

The Russian respondents to the survey of civil society are unanimous in providing a negative assessment of the current state of affairs with regard to the role of the EU in supporting the enabling environment for the Russian civil society.

The sustainability of networking among Russian and European NGOs has also seen a strain in the recent years. It is increasingly more difficult for foreign NGOs to operate in Russia. Travel to Europe for Russian civil society actors remains complicated due to the visa procedures.

Indicator 5.1c

Extent to which the achievements seen in enhanced involvement of civil society in the policy sphere are maintained.

³⁷⁴ The 2009 amendments reversed to some extent the restrictions introduced in 2006 to the Russian Law on NGOs

³⁷⁵ According to the CIVICUS Monitor, the Russian environment for civil society is classified as repressive in 2018. <https://civicus.org/index.php/media-resources/news/3640-new-report-6-in-10-countries-now-seriously-repressing-civic-freedoms>

The Russian respondents to the civil society survey are unanimous in their negative assessment of the state of affairs with regard to involvement of civil society in the policy sphere post-2012. Since 2012 the Russian government sought to curtail involvement of independent civil society actors in the policy sphere, in particular of those NGOs who receive foreign funding. To this end the Russian government not only introduced a package of restrictive legislative measures, but also launched a smear propaganda campaign against foreign donors and Foreign Agents.

The documentary review of the project sample as well as internet-based research demonstrate signs of discontinuation of partnerships between foreign funded NGOs and authorities. There are also cases where local CSOs give in to pressure and withdraw cooperation with those CSO who operate re-granting, as local CSOs are required to report whether their partners receive foreign funding. There is also evidence that some NGOs chose to refrain from engagement with authorities and limit their activities to providing services to the general public.

Judgement Criterion 5.2: The design and implementation of EU interventions and activities have facilitated sustainability.

Indicator 5.2a	Phasing-out measures were developed and deployed.
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The documentary evidence made available to the evaluation does not provide details of phasing out strategies. Documentary review has demonstrated that planning for financial and institutional sustainability had become increasingly difficult for the EU grantees in recent years due to the uncertainty of the environment within which Russian NGOs have to implement EU funded projects.

Indicator 5.2b	Effective liaison over sustainability was conducted with key stakeholders in the civil society, governmental and international donor spheres.
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Documentary review has shown that the strongest prospects for sustainability for EU-funded projects existed where the interests of all stakeholders (project partners, local and grass root organisations, beneficiaries, as well authorities) converged. The higher demand-driven nature of project activities meant the higher the degree of sustainability. This trend is most evident prior to 2012. For instance, one EIDHR project provided capacity development for local organisations in human rights, who then were able to receive funding from the Russian government to conduct training in human rights at the local level. In the case of another EIRHD project, the implementing NGO was able to receive Russian government funds to continue with their work. Some IBPP funded projects secured their sustainability by receiving funding from local authorities, or by ensuring that their methodologies were adopted by various agencies with whom the projects interacted. In the period between 2010-13 EUD Moscow was able to support the interaction between all relevant stakeholders through the organisation of regular conferences and events that would bring together implementers of EU-funded projects, federal authorities, representatives of donor community as well as Russian civil society.

This open interaction and exchange of experiences ceased in the recent years due to the deterioration in political relations between Russia and the EU and because of the restrictive measures imposed by the Russian government on Russian society domestically.

Nevertheless, despite the restrictive climate within which Russian NGOs have to implement the EU-funded projects, the External Evaluation of the EIDHR CBSS for Russia conducted in 2015 re-confirmed that *“those projects that meet identified demands of the population have greater sustainability since they usually have grassroots support and have involved where possible the authorities.”*³⁷⁶

Whilst pursuing the policy of restricting the flow of foreign funding for Russian NGOs, the Russian government sought to encourage the work of “socially orientated non-commercial organisation” through the additional legislative changes as well as the provision of funding to the work of SCOs that meet the definition of “Providers

³⁷⁶ External Evaluation of the EIDHR CBSS for Russia, 2015, p.45

of Public Benefit Services”³⁷⁷. The current Russian climate creates a dilemma for EU-funded Russian NGOs whether to seek or refrain from foreign support and re-orientate towards domestic sources of funding.

Apart from governmental sources of funding, Russian NGOs are increasingly relying on crowdsourcing, fundraising, private and public donations³⁷⁸. A new generation of Russian civil society actors is emerging that has never had to rely on foreign funding³⁷⁹.

EQ6 (Coordination, complementarity and coherence): To what extent have the various forms of EU engagement (including policy dialogue and financial support) with Civil Society in Russia been effectively coordinated, complementary, and coherent with the activities of EU MS and other donors?

Judgement Criterion 6.1: Links between policy work, multi-stakeholder dialogues (e.g. fora) and financial support were effectively established and coordinated in each of the regions under evaluation.

Indicator 6.1a	Effective coordination among relevant EU DGs, EEAS, EUDs etc. was established over the question of EU engagement with civil society
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According to feedback provided by EUD Moscow, effective cooperation has been established among DG NEAR, EEAS and EUD Moscow over the question of EU engagement with civil society. A forum for such coordination is facilitated by the joint exercises organised within the framework of the development of EU Roadmaps for Civil Society.

Judgement Criterion 6.2: The combined efforts of the EU and EU Member States and other donors have led to a coherent and complementary response to the needs of civil society.

Indicator 6.2a	Effective coordination between the EU and EU Member States and other donors was achieved.
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According to feedback received from EUD Moscow, prior to 2012 regular donor coordination was practised in Russia. The most recent practice is for donor coordination meetings to have a more ad hoc and informal character when they take place in Russia. Some donor coordination is also taking place in Brussels, or in conjunction with the EU Civil Society Forum.³⁸⁰ No documentary evidence shared with the ET contained information relating to donor coordination. It is assumed therefore that this information is considered to be too sensitive to share with non-EU staff.

Judgement Criterion 6.3: Synergies were achieved and duplication of efforts of the EU, EU MS and other donors was avoided in Russia.

Indicator 6.3a	Extent to which synergies were identified and exploited, overlaps were avoided at the policy level
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³⁷⁷ Civil Society Monitor: Russia, ICLN, <http://www.icnl.org/research/monitor/russia.html>

³⁷⁸ <https://www.openglobalrights.org/crowdfunding-to-bypass-russia-s-civil-society-crackdown/?lang=Russian>

³⁷⁹ <https://www.openglobalrights.org/despite-closing-space-innovative-branches-of-russian-civil-society-thrive/?lang=Russian>

³⁸⁰ Interview with a representative of EUD Moscow

The period under evaluation has witnessed the phenomenon of “shrinking space” not only for Russian NGOs but also for foreign donors and international organisations operating in Russia due to the introduction of various restrictive legislative changes aimed at curbing foreign funding to Russian CSOs over the period 2012-2014.³⁸¹ Even before that the number of foreign donors operating in Russia had been declining.³⁸²

The deterioration of the relations between Russia and the West (EU, EU MS and the USA) seen since 2013 and, in particular, since the annexation of Crimea has resulted not only in the sanctions imposed on Russia and vice versa, and the decrease in cooperation in general but also in the rolling back of the political dialogue over the issues relating to democracy, human rights, civic and political freedom. The mechanisms for engagement with the Russian government had been suspended: EU-Russia regular human rights consultations as well as the joint workshops between the European Economic and Social Committee (EESC) and the Civic Chamber of the Russian Federation (CCRF) were stopped. Russian membership in G8 was also suspended resulting in the loss of a G8 format for political engagement with Russia, including in the sphere of democracy and human rights.

Indicator 6.3b

Extent to which synergies were identified and exploited, overlaps were avoided at the implementation level.

The current evaluation exercise has not had access to Russian CSOs that have been involved in implementing EU-funded projects, as EUD Moscow deemed this not to be safe for Russian interlocutors, given the possible risks involved in providing feedback to an external evaluation. Out of three programme-level evaluation reports available to the current evaluation, only one report, the external evaluation of the Institution Building Partnership Programme in Russia conducted in October-November 2011, addressed the issue of synergies with other donors as well as the synergies with the Russian government funding. The IBPP evaluation report covering the period between 2007-11 identified synergies with the USAID-funded activities, activities implemented by the UNICEF, UK embassy, the MATRA Programme implemented by the Dutch Government and the World Bank small grant scheme. According to the feedback provided by the IBPP grantees, the IBPP was considered as a unique initiative “*in terms of geographical scope, flexibility and focus on service providing (rather than simply campaigning) NGOs.*”³⁸³ The review of the sample has allowed for the additional identification of synergies at the project level, e.g. with the Council of Europe, and Russian Governmental funding such as the Presidential Fund.

EQ7 (EU-added value): To what extent have the various forms of EU's engagement with Civil Society in Russia over the evaluation period had characteristics which distinguished it from that of other actors?

Judgement Criterion 7.1: EU support to civil society in Russia has had a distinctive feature in comparison with that provided by other actors, based on its comprehensive and multi-faceted approach.

Indicator 7.1a

The combination of forms of engagement with civil society has been a distinctive feature of the EU's support.

Between 2007-2012, international donor activity in support of Russian civil society was conducted to a relatively limited extent, in line with the status of Russia as a middle income country³⁸⁴. From 2010 there was a decline in donor funding for this sphere, even prior to the political changes since 2012. The key donors working

³⁸¹ Among the legislative changes that directly targeted foreign donors and organisations are the introduction of the Federal Law on Measures of Influence of Persons Relating to Violation of Basic Human Rights and Freedoms of Citizens of the Russian Federation in 2012 and a range of amendments to Russian legislation made in 2014 dubbed as “the Law on Undesirable Organizations”, see, for instance, Civic Freedom Monitor: Russia

³⁸² External evaluation of the Institution Building Partnership Programme in Russia, 2011, p. 49

³⁸³ External evaluation of the Institution Building Partnership Programme in Russia, 2011, p. 49

³⁸⁴ Donors operating in Russia during this period across all sectors included the World Bank and UNDP, the US and Canada, the EU, and the EU MS Denmark, Finland, Germany, the Netherlands, Sweden and the UK.

on the civil society priority area were USAID, Netherlands, Sweden. Since 2012 there has been an exodus of international donors from Russia, a consequence of the worsening of relations between the RF and the EU and the USA and other countries that had previously actively supported civil society in Russia. As USAID has ceased operations in Russia in 2012, after the Russian government demanded it do so having accused it of ‘meddling in politics’³⁸⁵ the EU and those MS that have continued to provide active support to civil society have been the key agencies in the donor sphere.

Of those donors still actively supporting civil society, Sida (Sweden) has included an emphasis on gender rights, as well as activities in support of trades unions³⁸⁶. Sweden and Finland continue to work on environmental issues in the Baltic Sea region and in the Arctic, that aims to involve civil society participation. A full assessment of EU MS support, and indeed of EU support itself, is difficult to achieve, as the support has increasingly taken on a far lower profile in terms of visibility (reflected in the decrease in the availability of documentary evidence), in response to the negative stance adopted by the Russian authorities since 2012.

Within this context, and as one of the few remaining international donors supporting civil society in Russia, the EU has sought to leverage its financed as well as political support to civil society in Russia notwithstanding the increasing constraints seen since 2012. The EU continues both to monitor the situation in Russia and provide political as well as financial support to Russian civil society to the extent feasible in the increasingly difficult context shaped by the deterioration seen in the Russian domestic political climate as well as EU-Russian relations. The EU reconfirmed its commitment to supporting people-to-people contacts and Russian civil society as one of the Five Guiding Principles defining its current relations with Russia³⁸⁷. The extent to which the EU has been able to pursue all 3 forms of engagement has been considerably curtailed, however, in comparison to the situation seen in the other regions under evaluation.

Indicator 7.1b

The combination of thematic and regional instruments has been a distinctive feature of the EU’s support.

The EU was able to combine thematic and regional instruments to the extent feasible in the Russian context. The EIDHR instrument has allowed the EU support to address “tough” cases in the sphere of human rights protection, such as human rights violations relating to abuse of conscripts, torture in prisons, LGBT rights; whereas the NSA-LA and its predecessor, IBPP, served to provide support to civil society in such spheres as children’s rights, women’s rights, the rights of people with disabilities. Through this combination the EU was able to provide a more comprehensive thematic coverage. The EU support provided through “Non-state Actors and Local Authorities programme for the Baltic Sea Region within the framework of priorities of the Northern Dimension” allowed for an additional sub-regional outreach within Russia.

In the opinion of some respondents to the survey, EU support to civil society in Russia is considered to be ‘less politicised’ in comparison with the USAID approach to civil society – and this has been a factor that has allowed the EU to continue to be active in this sphere, despite the negative changes since in recent years. A further distinctive feature of EU support has been the emphasis on partnership building and networking among Russian and European NGOs. This has been achieved through the above-mentioned instruments as well through the activities of the EU-Russia Civil Society Forum. (This can be compared with Sida support – which also emphasises networking, but between Russian and Swedish NGOs, i.e. on a bilateral, not pan-European basis.) The involvement of Russian civil society organisations in the regional initiatives funded by the EU extended the opportunity for networking and sharing of experience with counterparts from Neighbourhood East/ Black Sea Region countries. For instance, the Black Sea NGO Forum, established in the framework of the Black Sea Synergy Regional Cooperation Initiative, created a platform for networking among civil society representatives, governmental and international stakeholders from the wider Black Sea region, including Russia.

Indicator 7.1c

The combination of modalities and modes of engagement has been a distinctive feature of the EU’s support.

³⁸⁵ <https://www.bbc.co.uk/news/world-europe-19644897>

³⁸⁶ <https://www.sida.se/English/where-we-work/Europe/Russia/Our-work-in-Russia/>

³⁸⁷ “The EU’s Russia policy: Five guiding principles”, Briefing October 2016, EPRS, European Parliamentary Research Service, European Parliament

The EU has used grants as a primary modality of targeted support to civil society in Russia. While there is a recognition that EU grants are accessible only to the most mature CSOs in terms of their institutional and financial capacity, the structure of such grants allows, in principle, for outreach to smaller organisations that cannot apply directly for the EU funding, via the capacity development activities aimed at small/grassroot organisations as well as the provision of funding to small/grassroot organisations via the distribution of micro-grants, or re-granting. However, in the current ‘disabling’ environment, reaching out to small NGOs and grass root organisations is restricted due to their increasing unwillingness to associate themselves with foreign funding.

Prior to the deterioration seen in relations between the EU and Russia, the EU source of funding or the EU origin of approaches/standards promoted by the projects could be seen as a strong added-value among various stakeholders³⁸⁸. Since 2014, the situation has changed dramatically, both the EUD and the implementers of EU-funded projects have to observe caution, and refrain from /show caution when promoting EU visibility.³⁸⁹ Some grantees reported that they feel safer if they can show an association to the Council of Europe or UN, as Russia is a member of these international organisations³⁹⁰, though there is also evidence that the activities implemented under the Council of Europe aegis are not immune from running into difficulties³⁹¹.

EQ8 (EU-added value): To what extent could changes, which the EU contributed to, have happened in its absence?

Judgement Criterion 8.1: EU support has been an essential factor in contributing to significant change in the sphere of civil society development in Russia

Indicator 8.1a	EU support has responded to an extent or in ways not provided by other donors.
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Among the positive features of the EU support to civil society the respondents to the survey named a strategic, long-term and less politicised approach of the EU support, in comparison with other donors. According to one respondent: ‘*The EU has the capacity to be one of the most effective donors, especially when it comes to promoting democratic values, human rights, the rule of law, good governance. Therefore EU support is important and much needed.*’ However, the respondents to the survey also noted the perceived low accessibility of EU funding and a very limited outreach of the EU support to Russian civil society. EU-Russia CSF members further noted that only strong and Moscow-based organisations have access to EU funding due to limited funds and high capacity requirements for applicants. The EUD now increasingly focuses on regional issues, and each call for proposal includes a consideration of regional issues as a priority.

Indicator 8.1b	The EU has been able to leverage institutional and financial resources not available to other donors.
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As mentioned above the number of foreign donors able to operate in Russia has shrunk dramatically. While the EU continues to operate in Russia, the number of staff working in the EUD was reduced from 30 to 5.³⁹² This represents a strain on human resources within the EUD. Notwithstanding the deterioration seen in the relationship between the EU and Russia, the EU has reinstated its political commitment to the support of Russian civil society. The distribution of financial support to Russian civil society via the main instruments such as the EIDHR has been continuous throughout the whole period under the evaluation. In order to reconcile the reduction in the institutional (HR) resources and the need to continue with financial support to Russian civil society, the EUD has had to resort to enlarging the size of grants in order to achieve the manageability of the EU support. This enlargement of grants has resulted in the reduction of the number of projects funded per year. Within this approach the EU has emphasised the re-granting component in order to maximise the outreach. E.g. there is a requirement within EIDHR grant calls for 30% re-granting for the grants exceeding 400,000 Euro.

³⁸⁸ External evaluation of the Institution Building Partnership Programme in Russia, 2011, p.20

³⁸⁹ The EUD has introduced a waiver to the EU visibility rules

³⁹⁰ External Evaluation of the EIDHR CBSS for Russia, 2015, p. 44

³⁹¹ External Evaluation of the EIDHR CBSS for Russia, 2015, p. 44

³⁹² Interview with a representative of DG NEAR, September 2018

