



BRIEFING  
PAPER

JUNE  
2015

# ENP review public consultation: WWF contribution

A review of the European Neighbourhood Policy reflects the need for reviving a partnership that is under pressure while identifying options for improving EU's relationship and strategic engagement with Partner countries, to the South and East. The context has changed since the last review process and serious crises and conflicts affect many of the ENP countries. At the same time, development challenges faced in both regions are increasing including natural resource use and management and the impacts of climate change. WWF believes that a review of the ENP presents an opportunity to address not only pressing short term challenges, or the symptoms of deeper issues, but also to tackle the root causes of insecurity, conflicts, inequalities and unsustainable development and natural resource management and exploitation. This opportunity should not be missed if the EU is serious about its ambition to continuously improve its relations with its neighbours, promoting change towards democracy and sustainability.

The views expressed in this document are based on the inputs and experience of WWF offices working in some of the EU Neighbourhood countries to the south and east. Our contribution is structured around four key questions which were raised by the European Commission on the occasion of a consultative meeting held in Brussels on the 23rd of June with civil society representatives including WWF. The structure of the official EC consultation document and its broader list of issues were also taken into account when preparing our contribution. In this way we believe that WWF's concise feedback can contribute shaping a more effective and desirable partnership with the EU's neighbours.

# 1) SHOULD THE EU BE TAKING A MORE TAILOR MADE, DIFFERENTIATED APPROACH IN ITS RELATIONS WITH ENP PARTNERS?

## **A differentiated yet integrated approach**

The EU in the past has committed to increase its support to neighbouring countries, promising “more for more” and following a differentiated approach linking support to progress on reforms. For WWF this represented an opportunity to associate ENP countries to the EU's ambition to move towards a green economy and social-economic development that is coupled with environmental protection and investment in critical natural capital assets. Some progress has been achieved, however the cited “more for more” principle, with the corresponding “less for less”, did not always have the leverage to push for democratic reforms or to achieve results in terms of sustainable and inclusive development, with a few exceptions.

The Neighbourhood regions East and South are quite different, in terms of social, economic, cultural and environmental issues and levels of development and as a result face different challenges. The level of ambition regarding EU integration varies from those countries aspiring to have the closest possible relationship with the EU to others who are now rethinking the scope of their partnership. Within each region different factors contribute to push countries in different directions, with implications for the regional approach and its added value. Within the Eastern Partnership (EaP) for instance, countries like Armenia and Azerbaijan are moving towards closer relations with Russia and further away from the EU, while others like Ukraine and Georgia tend to have the opposite trend.

In light of these challenges, the EU may want to explore new relationship formats to satisfy the aspirations and choices of each partner. Hence a more differentiated and tailored approach to its partners could be desirable for the future, based on country ownership and meaningful participation of key stakeholders, without losing the strategic value added of addressing common challenges on a regional or at least transnational level. This would imply supporting democratic reforms and promoting respect for human rights, as well as creating development opportunities which look at all dimensions of sustainability (environmental, economic and social) in an integrated fashion with a long term perspective. Other elements should not be overlooked, such as cooperating on migration, security and peace while recognising the links between security, natural resources and human well-being. Good environmental governance and sustainable natural resource use, transboundary water basin management, marine and fisheries, energy and climate change would be obvious issues that would be addressed in such a context.

Within each region, differentiation should be promoted to allow for different depths of partnership according to the needs and priorities of each, acknowledging that countries differ in their desire for harmonising policies with the EU. For instance a review and renegotiation of the Association Agreements with ENP countries might be one channel that would allow for a more strategic approach with ENP countries, ensuring more coordination and coherent approaches between EU and MS in their external relationships.

## 2) HOW CAN THE EUROPEAN NEIGHBOURHOOD POLICY BECOME MORE FLEXIBLE?

When looking at options for the ENP to become more flexible and promoting a more differentiated approach, it would be useful to carry out an assessment of the tools that are currently available and how these have been working so far. To this end we have looked at the ENP action Plans and ENP progress reports highlighting whether these have proven to be the right tools to deepen our partnerships or if they have provided added value towards reaching agreed objectives.

### **ENP Action Plans**

The Action Plans have framed the development of relationships between the EU and most ENP partners. However, often these have proved to be too vague, broad, and lacking indicators and/or clear targets against which to measure progress. This has made them appear unachievable in their entirety and thus undermined the ambition and intent. They have created a sense of ambiguity in the sense that whatever is done somehow seems to fit the action plan. For instance, having an action point “promoting sustainable development and green economy” (example from existing Ukraine AP) was meaningless without accompanying targets and indicators to help identify clear and measurable outcomes.

However, in a revised ENP and with a new approach to Action Plans, it is important to ensure that a more flexible tool with a targeted focus will not undermine the achievement of priorities for sustainable development in all its dimensions, economic social and environmental. In this sense the ENP review could benefit playing close attention to the ongoing process of developing the future Sustainable Development Goals (SDGs) at international level, where the three dimensions of sustainability clearly come together in a universal framework that will apply to all countries, including the EU.

It will also be fundamental to include some support measures within the future Action Plans that contribute to strengthening civil society participation and building capacity for good governance. Although one might argue that this counteracts the aim of fostering ownership among EAP countries, it can be justified by a stronger “investment approach”. In addition, both short-term and long-term objectives are needed in future Action Plans: short term to react flexibly to new challenges and show that cooperation has tangible outputs and long-term to ensure sustainability of outcomes.

For those countries where there is little appetite for closer integration, the Action Plan should be more limited, thereby also creating less bureaucratic burden. If a country is currently not showing strong interest in harmonising its policies with those of the EU, the Action Plan should focus on the few areas where there seems to be a realistic chance of achieving impact. This may be complemented with a more strategic engagement with these countries through the regional or continental initiatives and existing strategies with the neighbours of the neighbours, for example the Joint Africa-EU strategy covering the northern African countries.

### **ENP Progress Reports**

Such reports are a tool which is supposed to help the EU monitor progress with each of the ENP partners that have Action Plans against the jointly agreed objectives set out in those Plans. However reality has shown that progress reports are rather vague - most likely as the action plans themselves are vague.

In some cases, after having been involved in the process of developing the ENP progress reports, the feeling that emerged among some civil society groups is that the value of the tool is not clear. The tool is often a narrative description of content and objectives which are difficult to measure against indicators that do not always exist. Contributions to the ENP progress report are not sought in a timely manner nor through a highly transparent process, making it difficult for participants to understand how and to what extent their contributions are taken into consideration and valued in relation to others. Some topics dominate the content of the Progress report while for other themes, like environment, energy, climate change, fisheries, water and many more, there is not always a direct counterpart in the European

Delegation (EUD) and an effective dialogue on these issues is thus undermined in the framework of the progress reports.

Looking forward, ENP Progress Reports could be transformed into a useful tool if they are able to stimulate effective civil society dialogue, promoting accountability and more balanced discussions on all priorities backed by stronger indicators and targets to effectively measure progress. It will be important to identify lessons learnt and areas for further support. Since, in many of the countries concerned, critical public discourse, participation and transparency are not so well developed, the EU reports may continue to have a role, as long as there are meaningful evaluations happening on the ground. Certainly useful would be to promote tripartite consultative meeting between governments, civil society representatives and the EU. Examples of such approaches exist in Northern African countries, for instance in Morocco where CSOs participate in the Annual Thematic subcommittees (on Environment, Energy and Transport). Such a participative approach could be instituted in all ENP countries.

### 3) ON WHAT PARTICULAR POLICY AREAS THE ENP SHOULD BE FOCUSING WITH ITS PARTNERS?

The ENP review is an opportunity to establish a firm understanding between the EU and partners on areas of common interest and to consolidate the basis for a future strengthened partnership. As mentioned, a revised ENP needs to be tailored to the needs and aspirations of the partner countries, address key pressing challenges that need a solution in the short term and at the same time have a **long term vision** focused on support for democratic governance reforms and **inclusive sustainable development in its economic, environmental and social dimensions**. Thus, if a more focused approach is pursued, we would strongly recommend the integration of environmental and climate change considerations throughout. Based on the list of focal areas suggested in the EC consultation document, which include Governance; Security; Economic development; Energy and connectivity; Migration, Mobility, the following key recommendations can be outlined.

#### **Promote Environment and Climate Mainstreaming**

In a view of promoting prosperity in partner countries there is a need to address structural weaknesses and root causes of conflicts and unsustainable development. Hence the need to address inequalities and poverty, promote respect for the rule of law, good governance and greater space for civil society and policy dialogue. In addition, WWF believes that achieving a long-term goal of prosperity, while focusing EU support to key sectors, can only be achieved if biodiversity, environment and climate change related aspects are being integrated throughout all objectives and consequently into country and regional action plans. This is why an emphasis on **sustainable economic development** is encouraged and should be complemented by relevant targets and indicators to ensure meaningful action and to enable progress on such an integrated approach to be measured (e.g., measures of progress that look beyond GDP growth; creating x new jobs in the rural economy without reducing environmental quality or increasing emission of GHG).

#### **Valuing Natural Capital**

For WWF, it is also important that the revised strategy acknowledges and **addresses the role and value of ecosystems (natural capital)** in providing a wide range of benefits that are essential for human well-being and economic development perspectives. These would range from provision of goods, such as food and water, to services like carbon storage, flood regulation, soil formation as well as recreation and spiritual values. Generally the economic benefits of these services are not recognised or captured in markets, resulting in ecosystem degradation and the irreversible loss of natural capital. WWF actively invests in promoting tools such as “The Economics of Ecosystems and Biodiversity” (TEEB) which shows that investing in the conservation and restoration of natural assets saves societies from facing the cost of the loss of fundamental ecosystem services, ensures the maintenance of non-marketed services that are essential for human well-being, and creates new business opportunities.

In this respect, WWF recommends favouring investment in the natural capital of EU neighbouring countries (forest/rural areas, water ecosystems, coastal landscapes, fisheries, sun and wind energy – are all critical assets) over « hard » investments (traditional infrastructure development) as well as promoting **innovative tools for environmental integration and the protection of natural resources**. The latter might include Payment for Environmental Services initiatives or the implementation of the Ecosystem Based Approach in ENP projects. ENI funds should also support investment in natural capital (e.g. restored wetlands for flood control) that can help adaptation to a changing climate and avoid financing measures that work only under present climatic conditions.

In the context of promoting investment in natural capital protection and restoration, the EU should also help partner countries to achieve the 2020 goals agreed in the Convention of Biological Diversity especially in terms of: i) technical assistance and capacity building targeted to environmental and conservation bodies, and ii) development and implementation of nature protection legislation and proper management of existing and future protected areas.

### **Good governance**

Good governance is pivotal to achieving sustainable development. **Natural resource management** should be integrated in this focal area as explained above. In particular, if infrastructure projects are planned by public authorities in ecologically sensitive areas, for example roads and other transport infrastructure, energy plants such as hydropower plants, tourism infrastructures, hotels) it is key that the right capacity, skills, tools and resources are available – and used - to analyse environmental impacts and raise the appropriate issues to investors. Public authorities should also involve all relevant stakeholders in an effective manner and ensure that anti-corruption mechanisms and measures are in place. Good governance is critical in all sectors, therefore a certain percentage of ENP funds should be focussed on building up and supporting governance structures and mechanisms.

### **Energy**

Energy is identified as a focal sector for the future ENP and it is important to clarify from the start which type of energy and which energy-related issues shall be promoted beyond pure connectivity. With growing energy demand and needs in ENP countries, it is highly desirable to help these countries diversify their energy mix and reducing their dependency on fossil fuels, while contributing to reducing carbon emissions and avoiding the need to depend on dangerous nuclear energy. In line with our vision to achieve 100% Renewable Energy sources by 2050, we believe that clean, safe and affordable renewable energy sources should strongly be promoted by the EU in its relations with ENP countries, taking into account the potential of **RES (renewable energy sources)** development in some of these countries, for instance the solar power potential development in the ENP South countries. This support should mirror a **strategic country-wide vision for its energy mix** developed in consultation with all major stakeholders. It should ensure proper implementation through institutional strengthening, together with an adapted regulatory framework and innovative finance mechanisms.

At the same time, RES technologies need to be promoted with strong **biodiversity safeguards** in place since some can have biodiversity and ecosystem impacts if not planned very carefully. Hydropower, whether small or large, always has impact on river ecology and even mitigation measures can only partly reduce these impacts. Solar panels may also have impacts if they are installed on a large scale in protected areas. Similarly for windpower plants ecologically acceptable and economically viable locations have to be identified. In many ENP countries, ecological data and strong environmental authorities are lacking that can guarantee good planning processes, including the use of SEAs (strategic environmental assessments) and EIAs (environmental impact assessments) with the goal of minimising impact, while maximising their potential for the diversification of the energy mix.

Promotion of RES should be complemented by concrete efforts to ensure that energy efficiency receives high attention and political support at the national level. **Energy efficiency** is the cheapest and lowest impact option of meeting energy needs and should be seen as a profitable approach for all, therefore prioritized. Structural measures for efficient energy use should be also promoted - such as consumer behaviour analysis, efficient regulation, accompanying measures and incentives, and adapted financial packages.

## Organised crime

A strengthened focus on working with ENP partners on the fight against organised crime could include action on illegal wildlife trade where the connections span across Europe, often unhindered by EU borders. As an example, Caspian and Black Sea sturgeon populations are suffering from poaching pressure because of their valuable fish eggs (caviar) and meat. Illegal trade of sturgeon meat and caviar is facilitated by organised crime networks. Similarly, illegal logging and transport of illegally sourced wood can greatly be reduced by fighting against organised crime.

## Support to Civil Society

The ENP should further develop and deepen engagement with civil society and promote links with social partners, and other actors. The changes we witnessed in North Africa and in Eastern Europe, promoted and defended by civil society, clearly show that these organisations are willing and prepared to participate actively in the policy making process and need to be further empowered in a context of democratic governance and, where necessary, peaceful conflict resolution. **Sustainable development is unattainable without a strong civil society** that keeps governments accountable and ensures stakeholders participation in policy making and project assessment. EU cooperation with neighbours has so far done too little to enable a thriving civil society. A revised approach to the partnership should clearly define a new space for the full inclusion of civil society and their organisations in the process.

Effective, timely and properly planned civil society consultations should be a cornerstone of the EU's commitment to good governance and policy dialogue. The **principle of consultation with civil society** and key stakeholders (effective, meaningful, timely and transparent) needs to be fully embedded into the programmes, future Action Plan and the programming of EU funding support. In terms of institutionalised channels of dialogue and exchange between EU, partner countries and civil society actors, there is the example of the Civil Society Forum in the ENI EAST which is structured and is fully owned by civil society. In the ENI South, however, there is no similar process in place yet, despite recent attempts to go in this direction. Such attempts should be strengthened.

WWF is actively involved in some ENP countries in the promotion of **civil society capacity in the field of climate and environment policy**. In Morocco WWF supported the creation of a "Group de Travail" (GdT), at the occasion of a seminar held in Rabat in 2008 on the topic « Le rôle de la société civile dans la Politique Européenne de Voisinage et la préservation des ressources en eau au Maroc ». It is an informal grouping of Moroccan associations active in the field of environment and sustainable development. It works in a coordinated fashion to promote environmental policies at local and national level, and in relation to EU policies in the country. It supports education for sustainable development and awareness raising of Moroccan citizens on the importance of environmental protection for the sustainable development of their country.

The GdT is a good example in ENI South where a CSO network gives regular input and plays its role in monitoring EU and Moroccan Environmental policies. There has been a clear growth in analytical and policy skills and competences within this group and it is well advanced in moving from ad hoc consultation to continue and structured dialogue. However it needs facilitation and support, in particular for core operations, which is difficult to secure for the future, especially from EU funded opportunities.

Generally, WWF encourages the EU to promote an **appropriate mix of aid modalities** throughout its funding programmes for development cooperation, including in this case the ENI funds at the national, regional, Cross-Border level as well as within Civil Society Facility. Such mechanisms should target a large spectrum of CSOs, including environmental organisations and networks, who are committed and active at local and national level to promote better management of natural resources in their countries. Funding should enhance public participation and build the capacity of the civil society organisations to participate in policy dialogue at the local and national level. The EUDs should also continue to promote CSO participation in policy dialogue at local, national policy making levels by improving the linkages between the different instruments it has available such as the HRBA toolkit and the CSO Roadmaps.

CSO roadmaps have the potential of harmonising EU and Member States support to civil society dialogue and engagement and hence should be seen as catalyser for a coherent and effective

participation at all levels, including for example the programming of EU assistance and choice of focal sectors of support within the bilateral and regional cooperation. Moreover, if more MS's involvement is desirable, the CSO roadmap could be one of the channels to fully exploit and raise the level of political engagement to ensure coherence and consistency of the approaches. In the phase of implementation of the roadmaps it is important that EUD and MS fully engage in keeping up the momentum and actually increase their engagement in a participatory manner.

There are a few examples of particularly interesting tools that could be further provided within the revised ENP framework and its funding programmes.

For example, flexible finance tools for small to medium project such as the “Bistro” under TACIS, administered by the EU Delegation, that can respond quickly to emerging needs (e.g. a series of workshops in Ukraine to promote the hydropower Guiding Principles or some workshops with EU experts to get input to management planning of a concrete Protected Area (PA) or a legal analysis on feed-in tariffs). Such an instrument should be available to local authorities, NGOs, trade unions and other CS representatives.

WWF staff in Ukraine has profited from protected management courses offered by Austria's Klagenfurt University and scientific cooperation stemming from it. The Young Scientist Summer Programme (YSSP) of IIASA could be an excellent model for fostering future cooperation and establishing long-lasting contacts among young scientists (40 young scientists are being invited from around the globe to spend 3 months together, fully paid, to work on assignments of their interest and learn about what IIASA and their peers are doing). What would be desirable is flexible schemes that allow for paid internships/scholarships for colleagues working for NGOs in EAP countries.

## 4) HOW TO MAKE THE POLICY MORE VISIBLE AS WELL AS INCREASE A SENSE OF OWNERSHIP OF THE POLICY IN PARTNER COUNTRIES?

### **Increased ownership through participatory processes**

The European Neighbourhood Policy has been criticised for a lacking sense of ownership of the policy by the partner and across their societies, as well as a generally weak level of public awareness, both in the EU and in Neighbouring countries, of the policy's aims, results and impact.

With the opportunity provided by the review, there is room to identify those mechanisms and processes that can contribute to improve real ownership. Such efforts could include EU support for genuine and truly participatory process in the development of agreed priorities and work programmes (the future Action Plans and Progress reports) on a country and regional level and in a way that allows for an equal dialogue among partners, including from civil society, to discuss lessons learned, challenges and identify shared solutions and approaches.

The structures of the ENP should be made more collaborative, to highlight the partners' own choices and to enable all civil society actors to take part. Ownership and involvement of all stakeholders is key. For instance, if a country identifies the transport sector as one of its own priorities for deepening cooperation and integration with the EU, the EU should support programmes for participatory sustainable transport planning.

Energy planning should also be done with involvement of civil society to tap into the knowledge of civil society actors, to ensure transparent processes and to avoid the problems described above (such as badly sited hydropower plants or a focus on fossil fuel development). A similar approach is relevant for all sectors.

Furthermore there is a need to respect and promote mutual accountability between EU and partners, a principle introduced through the 2011 ENP reform. This principle ensures that “partners will be

accountable to the EU for the fulfilment of their reform commitments, and the EU will be accountable to partners for delivering on its promises of support". Indeed, ensuring mutual accountability and transparency in the implementation of the ENP will be invaluable to increase a sense of ownership of the "partnership" on both sides. Promoting "transparency" in policy formulation and engaging all relevant stakeholders including independent civil society, trade unions and media in different policy processes will also contribute to this objective and to the increased visibility of the ENP.

Besides promoting ownership and visibility of the new ENP, it is important that support and cooperation towards partner countries is carried out in respect of the EU's legal obligation for Policy Coherence for Development (PCD), as stated in article 208 of the TFEU. In reviewing its ENP strategy and in light of a more focused, albeit differentiated approach in Neighbouring countries, the EU should put in place appropriate structures and mechanisms to promote and ensure coherence across all policy areas promoted in partner countries (Particularly relevant in this regard are EU Trade, Environment, Climate Change, Security, Agriculture, Fisheries, Migration, Research and innovation, Transport and Energy )

These mechanisms could cover, for instance: proper impact assessments; designated Policy Coherence for Development (PCD) focal points in EU delegations; strengthened dialogue with local stakeholders regarding the impacts of EU policies. Furthermore, the EU should strengthen cooperation and coordination between, DG NEAR and other relevant DGs, the EEAS as well as its Member States to avoid discrepancies between their respective policies, and promote more sustainable development oriented results.



**For further  
information:****Margherita Solca**

EU Development Policy  
and Funding Officer  
WWF European Policy  
Office  
Avenue de Tervuren 168,  
1150 Brussels  
Tel: +32 2 7438800

**Why we are here**

To stop the degradation of the planet's natural environment and  
to build a future in which humans live in harmony with nature.

[www.wwf.eu](http://www.wwf.eu)