

A man in a suit is presenting to an audience in a conference room. A large screen in the background displays a line graph with an upward trend. The text is overlaid in yellow on a teal background.

Monitoring cohesion policy funds in central and eastern Europe

CEE

**Bankwatch
Network**

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Introduction

Partnership is a cornerstone of the programming and implementation of the European Union's cohesion policy. Unlike other EU funding streams, the Common Provisions Regulation (CPR)¹ that applies to the cohesion policy requires the involvement of public authorities at national, regional and local levels as well as economic and social partners and bodies representing civil society in accordance with the partnership principle. In order to achieve a meaningful and structured partnership, Member States must establish monitoring committees in which partners are represented, informed, and empowered to contribute to the design of the programmes. Monitoring committees therefore play a watchdog role in scrutinising the direction of the cohesion policy.

In central and eastern Europe, cohesion policy funds are an important source of funding for supporting a fair transition to a green economy. Despite the various delays that have affected the 2021–2027 cohesion policy programming cycle, the implementation phase is currently ongoing and the monitoring committees established in 2022 have now started deliberating on the programmes. Nevertheless, the functioning of the committees, the representation of partners on these platforms, and the frequency and quality of the meetings vary considerably from one country to the next.

The purpose of this briefing is to provide an overview of the monitoring committees charged with overseeing programmes on the environment, climate and energy, and the just transition in eight countries in central and eastern Europe. These countries are Bulgaria, the Czech Republic, Estonia, Hungary, Latvia, Poland, Romania and Slovakia. Following an explanation of the legal framework underpinning the monitoring committees, the second section of the briefing outlines the functioning and composition of these committees in the above countries, highlighting good and bad examples. The final section provides recommendations related to the analysis carried out.

Legal framework and the role of monitoring committees

The legal basis for the partnership provisions set out in the CPR applies to the governance of all European Structural and Investment Funds (ESIF), including the European Regional and Development Fund, the Cohesion Fund, and the Just

¹ European Parliament, Council of the European Union, [Regulation \(EU\) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy](#), *EUR-Lex*, 30 June 2021.

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Transition Fund (JTF). These funds are the focus of this analysis. Article 8 of the CPR, which focuses on the preparation of programmes, stipulates that Member States must organise and implement comprehensive partnerships with regional, local and urban public authorities, economic and social partners, civil society organisations, as well as research organisations and universities. The Article pays particular attention to the representation of environmental organisations, which are listed together with ‘bodies responsible for promoting social inclusion, fundamental rights, rights of persons with disabilities, gender equality and non-discrimination’.²

In 2014, the partnership principle was significantly strengthened with the introduction of the European Code of Conduct on Partnership³ (hereinafter referred to as the Code of Conduct) as a legal act attached to the CPR. Since then, Member States have had clear guidance on how to involve partners throughout the whole programming cycle, from the planning of investments through implementation monitoring to evaluation. With regard to monitoring committees, the Code of Conduct sets out membership and procedural rules that EU governments must weigh up when establishing committees in their respective countries. For example, partners need to be able to join the process at an early stage and be supplied with all of the necessary information in order to provide timely input. They may also be offered reimbursement, capacity-building opportunities, and technical assistance. Since the last revision of the CPR in 2021, Member States are required to involve partners in all phases of the programming cycle, which means that monitoring committees need to be appointed early in the process. Additionally, new provisions under the Code of Conduct, currently being revised, are expected to be released at the end of 2024. The revision of the Code of Conduct involves a wide group of partners within the European Community of Practice on Partnership (ECoPP),⁴ a platform established by the European Commission that brings together managing authorities and stakeholders.

Thanks to the legal provisions laid down in these two pieces of EU legislation, Member States are obliged to establish monitoring committees, the main platforms for ensuring that the cohesion policy is implemented with transparency, integrity and, above all, the meaningful participation of stakeholders. These stakeholders therefore have an essential role to play in the decision-making process. As stipulated in Article 40 of the CPR, monitoring committees are empowered to track progress in the implementation of the programmes, issue recommendations and, most importantly, discuss and approve the project selection criteria for all interventions under these programmes.⁵ This means that the members of the committees, including civil society organisations, can impact and improve the quality of the investments by ensuring that the selection criteria are rigorously applied.

Monitoring committees also have a key role to play in screening funds earmarked for harmful projects, and in ensuring that the necessary environmental safeguards, notably environmental impact assessments and

² Ibid., 27, 28.

³ European Commission, [Commission Delegated Regulation \(EU\) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds](#), *European Commission*, 14 March 2014.

⁴ European Commission, [European Community of Practice on Partnership \(ECoPP\)](#), *European Commission*, accessed 29 November 2023.

⁵ European Parliament, Council of the European Union, [Regulation \(EU\) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy](#), *EUR-Lex*, 49, 50, 30 June 2021.

environmental legislation, are properly applied and enforced. Considering the ambitious spending targets of the cohesion policy funds aimed at meeting the EU's green objectives, the role of these committees assumes even greater importance. In the current programming period between 2021 and 2027, new spending targets have been introduced for climate-related actions, specifically 30 per cent for the ERDF and 37 per cent for the Cohesion Fund. In tandem, the EU, building on its Biodiversity Strategy for 2030, is 'working towards the ambition of dedicating 7.5 per cent of the 2021-2027 Multiannual Financial Framework to biodiversity objectives as of 2040, and 10% in 2026 and 2027'.⁶

The current cohesion policy funds therefore represent a unique opportunity to ensure that investments are used for the direct benefit of people and the climate. To achieve a green transition that leaves no one behind, public participation has a significant role to play in the decision-making process. All groups need to be heard and involved at all levels to maximise the use of public resources, strengthen the sense of ownership of the projects supported, and reinforce the legitimacy of the EU cohesion policy.

Let us now examine the current status of the monitoring committees responsible for overseeing the 2021–2027 cohesion policy funds in eight central and eastern European countries.

Overview of EU fund monitoring committees in central and eastern Europe

While the CPR requires Member States to involve partners throughout the whole process, it also gives Member States the flexibility to involve relevant partners at different stages in the programming. As stated in Article 39 of the CPR, Member States are responsible for determining the composition of the monitoring committees and for ensuring that all relevant stakeholders are represented in a fair and balanced manner.⁷

In practice, this means that committees can be set up in very different ways across the respective Member States, depending on the size of the country, its administrative structure, relevant national regulations, and previous practice in monitoring European funds. Some Member States, such as Estonia, have chosen to establish only one monitoring committee, while others, such as Poland, have set up both national and regional monitoring committees. Regrettably, the EU legal framework does not specify how many committees must be established in a country or what topics each committee should follow. For example, in the current programming period, EU countries can choose to appoint a separate committee for the JTF or discuss the implementation of Territorial Just Transition Plans (TJTPs) on other committees. In general, the disbursement of the JTF can be overseen by:

- a dedicated national monitoring committee (Czech Republic);
- a national monitoring committee covering all or some EU funds, including the JTF (Estonia, Hungary, Latvia);
- or regional monitoring committees covering funds allocated under regional programmes (Poland).

⁶ European Commission, [Biodiversity financing](#), *European Commission*, accessed 10 November 2023.

⁷ European Parliament, Council of the European Union, [Regulation \(EU\) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy](#), *EUR-Lex*, 49, 30 June 2021.

The table below presents an overview of the monitoring committees tasked with overseeing the cohesion policy funds for the 2021–2027 period in eight countries in central and eastern Europe:

Country	Number and types of monitoring committee	Has a dedicated just transition monitoring committee been established?
Bulgaria 	One monitoring committee for the partnership agreement along with programme-specific committees.	No. The European Commission has not approved Bulgaria’s TJTP, which has delayed the rollout of the JTF. Just transition investments are currently covered under the 2014–2020 Regions in Growth Programme.
Czech Republic 	One monitoring committee for the majority of the programmes.	Yes. The Just Transition Programme covers all just transition investments in the country. ⁸
Estonia 	One monitoring committee for the 2021–2027 Multiannual Financial Framework.	No. However, a just transition steering group has been set up to oversee Estonia’s sole just transition region, Ida–Virumaa.
Hungary 	One monitoring committee for each programme and one monitoring committee for the partnership agreement. Various subcommittees have been set up to address cross-cutting issues affecting several programmes, such as energy efficiency and education.	Yes. The monitoring committee for the Environmental and Energy Efficiency Programme Plus (KEHOP Plusz) consists of three subcommittees, each of which oversees a specific county. The three counties are Borsod–Abaúj–Zemplén, Heves, and Baranya. As of mid-November 2023, none of these subcommittees had convened.
Latvia 	One monitoring committee for all EU cohesion policy funds. The Common Agricultural Policy funds and the European Maritime, Fisheries and Aquaculture Fund have their own separate monitoring committees.	No. The just transition is covered under the monitoring committee overseeing all EU cohesion policy funds.
Poland 	29 monitoring committees have been established to oversee the cohesion policy funds, including eight national committees, 16 regional committees, one co-ordination committee for the	Yes. The JTF is allocated to five regions: Upper Silesia, Lower Silesia, Łódzkie, Eastern Wielkopolska, and, on a slightly different basis, Western Małopolska. The spending of the fund in these regions is

⁸ Ministry of the Environment of the Czech Republic, [Just Transition 2021–2027](#), Ministry of the Environment of the Czech Republic, 26 September 2022.

	<p>partnership agreement, and four committees for Interreg programmes managed by Poland. Additionally, Polish civil society organisations are represented on the monitoring committee overseeing the national recovery and resilience plan and on four other Interreg monitoring committees managed by neighbouring countries. Poland is also represented on the monitoring committees of six more Interreg programmes at European and transnational levels, but without the involvement of civil society organisations.</p>	<p>overseen by regional monitoring committees, which are supported by just transition working groups. At the national level, a subcommittee called the Just Transition Council operates within the partnership agreement committee.</p>
<p>Romania</p> 	<p>The Ministry of Investments and European Projects has established eight programmes under the cohesion policy. Each of these programmes has its own monitoring committee.</p>	<p>Yes. The Ministry of Investments and European Projects, the main intermediary body, has established one dedicated just transition monitoring committee. Regional development agencies and county council working groups co-ordinate regional development policies and programmes in line with the TJTP and the JTF.</p>
<p>Slovakia</p> 	<p>One monitoring committee for Slovakia's overarching programme for 2021–2027 entitled 'Programme Slovakia'.⁹ Under the monitoring committee, several subcommittees have been established.</p>	<p>Yes. The monitoring committee for Programme Slovakia is supported by a subcommittee tasked with overseeing the JTF.</p>

Our previous analysis¹⁰ from December 2022 revealed that several Member States were late in establishing monitoring committees; in fact, only a few had begun deliberations by the end of last year. Although several delays at the start of the 2021–2027 programming cycle held back the appointment of the committees, all monitoring committees in the above countries, with the exception of Bulgaria, are currently meeting and discussing the implementation of the programmes, including the JTF. In the next section, we highlight good and bad practices in the functioning of these monitoring committees with the aim of assessing whether their provisions on institutional partnership align with EU legislation.

⁹ Ministry of Investments, Regional Development, and Informatization of the Slovak Republic, [Návrh Programu Slovensko 2021-2027](#), Office of the Government of the Slovak Republic: Open government portal, 22 June 2022.

¹⁰ CEE Bankwatch Network, [Participation Table 2022](#), Tableau Public, 28 November 2022.

Good and bad practices: monitoring committees in the 2021–2027 period

Despite the complexity of the existing monitoring committee systems, we have identified a number of common good and bad practices among monitoring committees based on the level of application of the partnership principle and compliance with the Code of Conduct. Our findings are informed by the contributions of CEE Bankwatch Network member groups involved in the monitoring committees overseeing programmes covering climate, energy, transport and the just transition in the eight countries mentioned above. The annex to this briefing provides a more detailed overview of these examples.



Good practices

- **Strengthening the institutional capacity of partners**

According to Article 17 of the Code of Conduct, managing authorities can provide technical assistance to strengthen the institutional capacity of partners ‘so that they can effectively participate in the preparation, implementation, monitoring and evaluation of the programmes’.¹¹ If well-implemented, technical assistance can help to enhance the typically limited capabilities of groups to influence change within monitoring committees. The following countries provide good examples of the implementation of technical assistance in the current programming cycle:

- In the **Czech Republic**, NEON, an informal network of non-governmental organisations, together with the Ministry of Regional Development, have set up a project to support cooperation between the state and civil society. Funded by the Ministry’s Technical Assistance Programme (OPTA),¹² the project comes into force at the beginning of 2024.
- In **Hungary**, the managing authorities of the Environmental and Energy Efficiency Programme Plus, the Human Resources Development Programme Plus (EFOP Plusz), and the Implementation Programme Plus (VOP Plusz) organise capacity-building trainings for their monitoring committee members; non-governmental organisations receive compensation for the time they spend participating in these meetings.
- In **Latvia**, technical assistance is provided to members of the EU funds monitoring committee in the form of capacity-building seminars; the Ministry of Finance consults non-governmental organisations when proposing topics to be covered in these seminars.
- In **Poland**, the Ministry of Development Funds and Regional Policy oversees the Technical Assistance for European Funds Programme,¹³ which includes an allocation of funds to help

¹¹ European Commission, [Commission Delegated Regulation \(EU\) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds](#), *European Commission*, 6, 14 March 2014.

¹² Ministry of Regional Development of the Czech Republic, [OP Technical Assistance \(2021-2027\)](#), *DotaceEU.cz*, 19 May 2022.

¹³ Ministry of Development Funds and Regional Policy, [Pomoc Techniczna dla Funduszy Europejskich](#), *Ministry of Development Funds and Regional Policy*, accessed 7 December 2023.

beneficiaries implement the EU cohesion policy funds. Each programme has a dedicated technical assistance allocation as well. However, the access of civil society organisations to these funds has been constrained by delays in setting out their rules of use.

- In **Slovakia**, the Office of the Plenipotentiary of the Government for the Development of Civil Society provides a capacity-building programme for civil society experts (not organisations)¹⁴ as well as technical assistance through ‘Programme Slovakia’ to evaluate the capacity of regions and municipalities within the just transition regions.¹⁵

- **Rules of membership for monitoring committee**

When applying the rules of membership for monitoring committees, as stated in Article 10 of the Code of Conduct, managing authorities are required to take two actions: engage partners who were previously involved in the preparation of the programmes, and promote gender equality and non-discrimination.¹⁶ However, as these provisions are overly general, the selection of partners is left to the discretion of the Member State concerned. Estonia is a good example of a monitoring committee represented by a wide range of partners:

- The representation of partners on Estonia’s sole monitoring committee is wide and inclusive. Government representatives make up less than 50 per cent of the committee, which comprises different social groups, such as the Estonian National Youth Council, the Estonian Union for Child Welfare, and the Estonian Chamber of People with Disabilities.

- **Rules of procedure for monitoring committees**

Monitoring committees are obliged to meet at least once a year, as specified in Article 38(3) of the CPR.¹⁷ However, the option of scheduling additional meetings is left to the discretion of the managing authorities. Article 11 of the Code of Conduct, which covers the rules of procedure of monitoring committees, specifies that the notice given about meetings and the transmission of documents ‘as a general rule, shall not be less than 10 working days’. Our analysis shows that the implementation of these rules of procedure varies widely across the eight central and eastern European countries. Poland stands out as an example of good practice:

- In **Poland**, the rules of procedure adopted for the European Funds for Infrastructure, Climate and the Environment (FEnIKS) Programme include longer deadlines for convening meetings and sending documents, at 15 and 10 working days, respectively. Members are also provided with more

¹⁴ Office of the Plenipotentiary of the Government of the Slovak Republic for the Development of Civil Society, [Projekt technickej pomoci Efektívne zapojenie občianskej spoločnosti do implementácie a monitorovania EŠIF zavádzaním participatívnych postupov 2](#), Ministry of the Interior of the Slovak Republic, accessed 6 December 2023.

¹⁵ Ministry of Investments, Regional Development, and Informatization of the Slovak Republic, [Program Slovensko](#), *eurofondy.gov.sk*, accessed 7 December 2023.

¹⁶ European Commission, [Commission Delegated Regulation \(EU\) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds](#), *European Commission*, 5, 14 March 2014.

¹⁷ European Parliament, Council of the European Union, [Regulation \(EU\) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy](#), *EUR-Lex*, 49, 30 June 2021.

time to comment compared to the period stipulated in the Code of Conduct. These extensions were introduced upon the request of civil society organisations to allow for consultations with experts and coalitions of non-governmental organisations, which typically meet once a month (with the exception of July and August). Since the beginning of the year, nine meetings have been organised under the programme, which favourably compares with the frequency of committee meetings in other Member States. However, it should be noted that despite the frequency of these meetings, the administrative capacity of partners has been overestimated: the sheer volume of technical documentation submitted by the managing authority prior to each meeting makes it impossible to carry out in-depth reviews or consult with peers.

- **Collaboration with managing authorities**

Where cooperation between the managing authority and committee members is particularly productive, comments and suggestions are more likely to be comprehensively discussed and considered. In some of the countries analysed, this has led to the following positive results:

- In **Slovakia**, comments submitted by civil society organisations have been adequately discussed. As a result, the preparation and approval of calls for proposals for many regional programmes and national projects have been conducted in a participatory manner.
- In **Poland**, following a request by the Polish Green Network, an evaluation plan adopted by the monitoring committee (FEnKS programme) was amended to include an assessment of ‘do no significant harm’ (DNSH). A compromise version of the request was agreed at a DNSH working group meeting and unanimously adopted by the monitoring committee. This collaboration has led to another positive development: Polish Green Network succeeded in supplementing the rules of procedure with binding green standards, including taking sustainable transport to meetings and dispensing with plastic cutlery.
- In **Hungary**, the existence of an energy subcommittee, which discusses concepts and draft selection criteria, is positive as these platforms offer an earlier and more effective opportunity to properly involve stakeholders in the decision-making process. Subcommittees provide greater opportunities for civil society organisations to become meaningfully involved and influence the decisions subsequently taken by the main monitoring committees than would be the case if stakeholders had to address the same issues only within the monitoring committees.



Bad practices

- **Selecting partners and the composition of committees**

Due to the absence of precise legal provisions on the composition of monitoring committees in the Code of Conduct, civil society organisations are under-represented on monitoring committees in central and eastern Europe, with the sole exception of Estonia, which represents good practice in this area:

- In **Bulgaria**, only four of the 42 committee members that make up the monitoring committee for the Transport Connectivity 2021–2027 programme are represented by civil society organisations.
- In the **Czech Republic**, there are only two non-governmental organisation networks among the 28 voting members of the Technologies and Applications for Competitiveness Programme (OP TAK).
- In **Slovakia**, the main monitoring committee overseeing cohesion policy programming consists of several subcommittees. Of the 37 full members and 13 observers on the subcommittee overseeing policy objective 2,¹⁸ which focuses on the green transition to a net-zero economy, only two (approx. four per cent) are civil society representatives.

Furthermore, given the lack of strict rules on the composition of these committees, managing authorities often simply reappoint the same committee members from the previous programming period, as in the case of the Technologies and Applications for Competitiveness Programme in the **Czech Republic**. This is problematic because it limits the inclusiveness and diversity of the partners, which has the effect of hindering the inclusion of new groups in the discussions. Youth groups, gender groups and LGBTIQ+ activists, despite having taken a firm foothold in modern society, still struggle to find a place on the monitoring committees overseeing programmes on the environment, climate, and the just transition. Because the provisions do not adequately specify the need to involve these particular vulnerable groups, the quality of the programmes is inevitably impacted. Given the increasing activity of these groups in discussions on the green agenda, their involvement could make a substantial contribution to the decision-making process.

Unfortunately, environmental organisations are also massively under-represented, despite the reference to the inclusion of environmental partners in Article 8 of the CPR. Given the large amount of funding allocated to achieving both climate and environmental goals in the current programming period, the lack of involvement of environmental civil society organisations makes it hard to verify whether the programmes align with the objectives of the European Green Deal, as the following examples show:

- In **Estonia**, the sole monitoring committee includes only one environmental umbrella organisation among its 33 members.
- In the **Czech Republic**, only one of the 28 members of the monitoring committee for the Technologies and Applications for Competitiveness Programme is represented by a green organisation.
- In **Latvia**, only one of the 62 members of the monitoring committee is represented by an environmental organisation.
- In **Romania**, only two out of a total of 29 members on the just transition monitoring committee are represented by environmental organisations.
- In **Slovakia**, 20 environmental non-governmental organisations are represented by only one member of the just transition subcommittee, and only two environmental non-governmental

¹⁸ Ministry of Investments, Regional Development and Informatization of the Slovak Republic, [Komisia pri Monitorovacom výbore pre Program Slovensko 2021 – 2027 pre cieľ 2 \(Zelenšia nízkouhlíková Európa\) politiky súdržnosti EÚ](#), [eurofondy.gov.sk](#), accessed 6 December 2023.

organisations are represented on the committee working on 'green' policy objective 2. The composition of the committees for the other policy objectives, which do not directly deal with green issues, is even less balanced.

- **Rules of procedure**

As mentioned above, EU partnership legislation allows managing authorities to decide how often the monitoring committees meet and which rules of procedure to adopt. In most of the cases analysed in this briefing, the lack of precise rules of procedure set out in the Code of Conduct can result in a very busy timetable for the members of the monitoring committees, making it more complicated to properly engage.

- In **Estonia**, the monitoring committee has met twice since the beginning of the current programming cycle, presumably meaning that it only meets once a year. Updates are occasionally shared via email on an ad hoc basis. The rules of procedure allow, in justified cases, for materials to be sent only one week before the meeting takes place. However, this clause has been exploited, such as in cases of email voting, without proper justification.
- In **Hungary**, the secretariat of the monitoring committee usually sends out a meeting invitation along with the meeting documents 10 days in advance. However, all too often, changes are made to the documents after they are sent. This makes it particularly difficult to properly prepare for the meeting, especially when other organisations need to be consulted.
- In **Slovakia**, meetings of the committee for policy objective 2 are held on an ad hoc basis without providing members with sufficient prior notice of the date or topics to be discussed. This limits the opportunities and time given to partners to prepare responses to the proposed documents. An indicative timeline of the topics for discussion shared in advance would allow experts to prepare relevant studies and carry out more extensive background research.

- **Technical assistance**

As previously stated, technical assistance is a crucial support that not only strengthens the institutional capacity of partners, but also allows them to actively participate and share their expertise during discussions at monitoring committee meetings. However, our analysis has identified cases where the technical support provided has been insufficient, such as in the following countries:

- In **Bulgaria**, technical assistance for the Transport programme is limited to simply covering the expenses of transport and accommodation.
- In **Estonia**, the allocation of technical assistance is severely limited. Only one non-governmental organisation has received financial support. Requests for technical assistance submitted by the other organisations have been rejected.

Conclusions and recommendations

This briefing has provided an overview of the functioning and composition of the monitoring committees appointed for the current cohesion policy programming period across central and eastern Europe. Although most of the committees only began work at the beginning of last year, there is still much room for improvement. Drawing on the experiences of CEE Bankwatch Network's member groups, who are represented on these monitoring committees, this briefing presents a collection of good and bad practices related to the partnership provisions outlined in the Code of Conduct.

The Code of Conduct is the main document that regulates the application of the partnership principle in the cohesion policy. Since its introduction in 2014, it has been instrumental in ensuring stakeholder engagement in the policy's programming cycles. However, some of the examples presented in this briefing reveal the need for stronger and more precise provisions to avoid uncertainty and arbitrary decisions. As we have learned, the ways in which the monitoring committees currently function have impacted the involvement of civil society and resulted in less-than-ideal working conditions, characterised by unrealistic deadlines, excessive documentation and a lack of technical assistance. The ongoing revision of the Code of Conduct is an opportunity to improve and update the current version of the document to make it compatible with the challenges we face today.

CEE Bankwatch Network contributes to the process of revising the Code of Conduct in its capacity as a member of the ECoPP. Based on the input of its members, the ECoPP is due to present a new version of the Code of Conduct, which the European Commission will consider when drafting its final proposal for the new text. Informed by our exchanges within the ECoPP, we here present our recommendations for improving the partnership provisions:

- The Code of Conduct should ensure that the representation of monitoring committees is balanced by adding requirements related to stakeholder diversity and the equal representation all interested parties. To achieve an acceptable level of diversity, reflecting the provision of ensuring a wide range of stakeholders in the Code of Conduct, marginalised and youth groups should be represented to reflect a variety of societal interests.
- The composition of monitoring committees should be tailored to the specific objectives of the monitored programme to facilitate participatory decision-making. For example, in the case of programmes dedicated to climate action and environmental conservation objectives, the representation of environmental organisations should be subject to a minimum quota of at least 30 per cent to reflect the significant share of climate and environmental spending in these programmes and the ambitious targets of the European Green Deal.
- The rules of procedure for monitoring committees should be supplemented with additional requirements that specify a minimum time frame for committee members to adequately review, evaluate and consult on documents. This will prevent committee members from being overburdened with an excessive workload that compromises the quality of their input and engagement.
- Technical assistance plays a key role in supporting partners. The provisions in the Code of Conduct should further specify that managing authorities must support partners in strengthening their

institutional capacity. In particular, priority should be given to partners who lack the resources, skills and confidence to contribute to the monitoring committees in order to ensure the inclusive participation of these marginalised groups.

- The partnership principle should be applied to all EU funds and policies in order to make cohesion policy a model of partnership, openness, inclusiveness and dialogue, bringing about a systematic change in the management of public funds.

Annex: Good and bad practices among monitoring committees in eight central and eastern Europe countries

Country	Monitoring committee	Good practices	Bad practices
Bulgaria	Transport Connectivity 2021–2027 Programme	<ul style="list-style-type: none"> • Support provide by external experts, such as in the case of Kresna Gorge. 	<ul style="list-style-type: none"> • Technical assistance is limited to covering expenses associated with transport and accommodation. • Under-representation of environmental civil society organisations.
Czech Republic	Technologies and Applications for Competitiveness Programme	<ul style="list-style-type: none"> • Technical assistance for capacity building is now available following a proposal by civil society. 	<ul style="list-style-type: none"> • Under-representation of environmental civil society organisations. • The composition of the monitoring committee replicates that of the previous programming period. • Youth groups are not represented on the Technologies and Applications for Competitiveness Programme.
Estonia	Multiannual Financial Framework (2021–2027)	<ul style="list-style-type: none"> • Wide and inclusive representation of civil society organisations, including youth groups and groups representing people with disabilities. • Comments are shared with all committee members, ensuring transparency. • Comments have thus far been consistently addressed. 	<ul style="list-style-type: none"> • Under-representation of environmental civil society organisations. • Only two meetings since the beginning of the period. • In justified cases, meeting materials may be sent only one week before the meeting takes place, but this loophole has been exploited in unmerited cases. • The limited technical assistance available means that most civil society organisations do not receive the allocation.

<p>Hungary</p>	<p>Environmental and Energy Efficiency Programme Plus</p>	<ul style="list-style-type: none"> • The managing authorities organise capacity-building trainings and, in some cases, reimburse non-governmental organisations for participating in these meetings. • The existence of an energy subcommittee, which discusses concepts and draft selection criteria, is positive as these platforms offer an earlier and more effective opportunity to properly involve stakeholders in the decision-making process. 	<ul style="list-style-type: none"> • Meeting documents are often changed at short notice prior to the meeting taking place.
<p>Latvia</p>	<p>EU cohesion policy funds (2021–2027)</p>	<ul style="list-style-type: none"> • Technical assistance is provided in the form of capacity-building seminars, and proposals for topics for discussion can be made. 	<ul style="list-style-type: none"> • Under-representation of environmental organisations. • Only one meeting has been held to date.
<p>Poland</p>	<p>European Funds for Infrastructure, Climate, and the Environment Programme</p>	<ul style="list-style-type: none"> • The operation of the monitoring committee is financed from a budget line for technical assistance; capacity building is one of the eligible uses of this budget. • As requested by civil society organisations, there are now longer deadlines for convening meetings and sending documents, and more time for members to comment on materials than required under the Code of Conduct. • Following a request by Polish Green Network, amendments to the evaluation plan were incorporated to include an 	<ul style="list-style-type: none"> • The huge volume of documentation supplied in advance of every meeting prevents monitoring committee members from thoroughly analysing the documents or consulting with civil society organisations and experts. • The composition of the monitoring committee does not fully reflect the topics and needs of the programme. Despite its climate focus, there are no dedicated seats for civil society organisations specialising in climate issues or for youth groups.

		assessment of ‘do no significant harm’.	
Romania	Just Transition Programme	<ul style="list-style-type: none"> • Comments are shared with committee members and addressed transparently. 	<ul style="list-style-type: none"> • Under-representation of environmental civil society organisations.
Slovakia	Policy objective 2 of the cohesion policy (green transition to a net-zero economy)	<ul style="list-style-type: none"> • Comments by civil society organisations are discussed and result in the approval of participatory preparation of the calls for proposals. • Capacity-building programme for civil society experts (not organisations) available under the Office of the Plenipotentiary of the Government for the Development of Civil Society. 	<ul style="list-style-type: none"> • Under-representation of environmental civil society organisations. • Meetings happen on an ad hoc basis and without providing adequate prior notice of the dates of the meetings or topics to be discussed.

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