

Process proposal for CSO participation in the 2024 update of the Green Agenda Action Plan

The Green Agenda Action Plan, endorsed by Western Balkan leaders at the EU – Western Balkans Summit in Slovenia in October 2021, consists of seven thematic roadmaps grouped under five pillars, with 58 actions, together with a description of the planned governance structure for its implementation and monitoring, and progress indicators for some topics.

Although the Action Plan claims that there was an *'extensive consultation process'* and that it was *'developed following a bottom-up approach'*, which among others, involved civil society organisations (CSOs), this is far from the truth, at least regarding environmental CSOs. The draft Plan was shared with environmental CSOs just two weeks before the Summit, preventing any meaningful consultation from taking place.

This, among other factors, contributed to the [poor quality of the Plan](#), which contains too many actions, poorly defined and difficult to measure, with only indicative deadlines, and in some cases no real clarity on who is responsible. This vagueness also weakens the first [implementation report](#), published in October 2023, which has difficulty in distinguishing which points have been completed, how to measure this, whether the progress made has been the result of the Green Agenda or would have happened anyway, and who is responsible for further action on points where no progress has been made.

Fortunately, updates to the Action Plan were built in from the start. It *'will be revised twice: by the end of 2024 and by the end of 2027, using the same consultative process with the Western Balkan authorities and partner regional organisations, thereby analysing the achieved progress against the AP objectives.'*

We very much hope that it will not be updated using the same process, but rather a much better one. To this end, we would like to make the suggestions below for CSO engagement in the Action Plan revision process. This might follow the same timeline as for other stakeholders (i.e. governments and others provide their comments at the same time as CSOs) or be done as a separate process.

However, it is important that CSOs are able to provide comments both at an early stage when all options are open (though obviously based on the Sofia Declaration), and at later stages when the draft has been adjusted according to other stakeholders' input.

- **Pre-draft consultation:** Define a period of at least three weeks during which CSOs can submit comments on the current Action Plan – *including the Actions, Roadmaps, and the governance structure* – and provide proactive suggestions for updates and changes based on the Sofia Declaration. As well as posting the information on the RCC website, proactively inform CSOs organisations who have already demonstrated an interest in the Green Agenda and make it clear where written comments should be submitted and by when. If joint CSO input is expected, the consultation period would need to be longer – at least six weeks.

- We recommend that this consultation takes place when the 2024 **Implementation Report** is published, or is at least accompanied by some kind of overview document on how the Action Plan implementation is going so far, as this would help to identify which elements need to be changed.
- If an **NGO Forum** event is to be organised this year, it would be useful to do it at the pre-draft consultation stage in order to gather targeted input on progress so far and needs for changes, or at the latest when a draft is available for consultation.
- **Consultation draft 1:** Provide a commenting period of at least three weeks (not including holiday periods) on the first draft of the updated Action Plan, including the following:
 - The proposed text of the updated Action Plan, including governance structure
 - A version of the current text with tracked changes showing the proposed updates for easy comparability with the current version.
 - An explanatory document of what updates are proposed and why.

If joint CSO input is expected, the consultation period needs to be at least six weeks.

- **Consultation draft 2:** To make the process more meaningful, we recommend a second commenting period on the updated proposed text of the Action Plan of at least three weeks (or six if joint CSO input is expected). This should be accompanied by an explanation of which comments were received in the CSO consultation and from other stakeholders, what has been changed from the previous draft and why, and which comments were not accepted and why.

Status of the Action Plan: More clarity is also needed on whether the Western Balkan governments actually commit to implementing part or all of the Plan and reporting on progress, and if so, by when. The current set-up, where it was ‘endorsed’ at the EU–Western Balkans summit in 2021 but does not seem to entail any reporting obligations, is very confusing and makes the Action Plan’s status unclear.

Timeline for next steps at the regional level: Unfortunately, the implementation of the Green Agenda is going very slowly. Too much time has been lost without a clear structure for including CSOs and without a clear, publicly available timeline for the next steps on the regional level. These both need to be clarified, preferably before the Action Plan update.

If the European Commission and RCC are serious about the Green Agenda and about promoting public participation in decision-making in the region, they must lead by example.

Civil society organisations know well what is needed to make the Green Agenda succeed and have much to offer in terms of knowledge and suggestions. However, we need adequate time to read, comment, coordinate, and agree on draft documents.

The stakes are high, and we have no time to lose. We will do our best to advance the goals of the Green Agenda, but we can only be effective if we are informed and consulted on time. Communication with civil society stakeholders has to be more strategic and consistent if the public is to understand the importance of the Green Agenda and feel connected to it.

Aarhus Center in BiH Bosnia and Herzegovina



Association of young ecologists of Niksic Montenegro



Belgrade Open School Serbia



Center for Economic Analyses - CEA North Macedonia



Center for Environment Bosnia and Herzegovina



Center for legal research and analysis North Macedonia



Center for protection and research of birds Montenegro



CEE Bankwatch Network Central and eastern Europe



Civic Alliance Montenegro



Climate Action Network Europe

Regional



Co-PLAN, Institute for Habitat Development

Albania



EDEN Center

Albania



European Environmental Bureau (EEB)

European network



4x4x4 Balkan Bridges Skopje

North Macedonia



Front 21/42

North Macedonia



Group of Rural Activists of Dibra-GARD

Albania



Green Home

Montenegro



Journalists for Human Rights, N. Macedonia

North Macedonia



Let's Do It Peja

Kosovo



Milieukontakt Albania

Albania



Montenegrin Ecologists Society

Montenegro



CRNOGORSKO DRUŠTVO
EKOLOGA

Organic Agriculture Association

Albania



Parks Dinarides - network of protected areas of Dinarides

Montenegro



Qendra Network Albania

Albania



Renewables and Environmental Regulatory Institute

Serbia



RES Foundation

Serbia



Western Balkan Network on Territorial Governance

Regional



WWF Adria

Regional



Youth Ecological and
Security Zone EcoZ

Kosovo



Youth Initiative for
Human Rights

Montenegro

