

## Joint NGO proposals on the GAWB Action Plan

### Part 3 - governance, monitoring, reporting and other mechanisms to support the implementation of the Sofia Declaration

#### Introduction

This document lays out joint civil society comments and proposals on Part 3 of the [Green Agenda Action Plan](#), on governance, monitoring, reporting and other mechanisms to support the implementation of the Sofia Declaration. It should be read in conjunction with our [comments](#) on Parts 1 and 2 of the Action Plan.

Currently, implementation of the Green Agenda is left to the countries, without any repercussions should they fail to make progress. We have been concerned from the beginning that offering IPA funds for the Green Agenda's implementation is not enough to make it happen. **Without binding implementation commitments from governments and consequences for non-implementation, progress is too slow.** It also complicates progress tracking, because national authorities can't be expected to report on something they haven't explicitly committed to. With so many items in the Action Plan, it is clear that not all countries will do all of them at the same time, but they need to choose at least some and report regularly.

The governance structure described in the current Action Plan is very loose and in reality most of the points described do not seem to have been implemented, or if they have, little or no information has been published about them. DG NEAR is insufficiently involved in coordination and oversight, instead outsourcing to the RCC and [Austrian Environment Agency](#), without making clear to the public how the division of labour works, what is expected of these bodies, by when, and how other stakeholders and civil society are to be involved.

The Green Agenda requires an all-out effort from different sectors across society, but this lack of clarity on the process has led to civil society feeling alienated from it, and often not understanding what the next steps are. And although they can speak up for themselves, we suspect this is also the case with at least some of the national governments and most local authorities. This clearly impacts on the Green Agenda's effectiveness.

We therefore hope our proposals will contribute to a more concrete and achievable Action Plan and ultimately to more results on the ground.

#### Comments and proposals on specific sections

##### Governance

The Action Plan names the inter-governmental **Regional Working Group on Environment** (RWG Env) established in 2015 as a backbone of the Green Agenda, along with other regional coordinators in charge of

various components of the Action Plan, and supported by the **South East Europe Biodiversity Taskforce** (SEE BDTF).

These need to be updated. The [IUCN's project on the BDTF](#) seems to have ended in 2021 and does not provide information on the deliverables or results of the project and the [RCC's page on the RWG Env](#) only mentions co-chairs up till 2020, with only very brief information on declarations generated by the body. The latest [Terms of Reference](#) for the ground we found online is from 2015, before the Green Agenda even existed. We found reference to a [similar-sounding working group meeting](#) in 2022, but it is not clear whether this is the same body, who is in it, when its meetings are, what is discussed or what the outcomes are. In November 2023, a Regional Working Group on Green Agenda for the Western Balkans (RWG GAWB) was [reportedly founded](#), but we could not find more information about it online.

The Action Plan also envisages **annual ministerial meetings** under the RWG Env framework, including ministers in charge of all relevant policy areas encompassed by the GAWB. A planned ministerial meeting in early 2022 ended up being cancelled, but apart from that, no such events are reported in the Implementation Report, nor are we aware of any. While we find it important to demonstrate political will for Green Agenda implementation at ministerial level, high-level meetings are expensive and time-consuming to organise, and do not go deep into the topics, so we would prefer to see mainstreaming of the GAWB into other similar events.

Two more platforms are also mentioned as part of the governance structure in the current Action Plan: The **NGO Forum** and **Green Agenda Days** for local self-governments. These are covered below under the respective sections on civil society and local authorities.

Given the above, **the Green Agenda's governance needs to be overhauled and updated in the Action Plan:**

- **The purely voluntary nature of the Green Agenda needs a re-think.** Governments do not need to do every single item in the Action Plan at the same time, but they do need to make specific time-bound commitments to specific actions that need to be either marked in the Action Plan or laid out in separate national action plans.
- Moreover, there need to be **consequences for failing to keep these commitments.** Obviously the rules have already been set for the current round of IPA funds, but for the next Multiannual Financial Framework, a more stringent framework is needed.<sup>1</sup> For Decarbonisation, introducing penalties into the Energy Community Treaty would help considerably, given the large overlap between the Treaty and the Green Agenda.
- **The Action Plan update must be closely consulted with the governments and they should be encouraged to propose actions.** But since they do not have to commit to every item at once, those with lower ambition should not be allowed to hold back the ambition of the whole document.

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<sup>1</sup> In this respect, the new Reform and Growth Facility will be an interesting pilot, being conditioned by the implementation of the envisaged reforms. Payments will be done twice a year, based on requests submitted by the Western Balkan partners and following verification by the Commission of the achievement of the relevant payment conditions and pre-conditions.

- **The RCC needs to introduce Progress Reporting Agreements** for the Western Balkan governments to fully commit to transparent reporting on the Action Plan implementation.
- **The RWG GAWB needs to be more transparent.** Publishing new terms of reference, a calendar of meetings, agendas and conclusions or outcomes is a must. Given that environmental decision-making must be as open to the public as possible, at least some of the meetings should be open to civil society.
- If not done already, **each Western Balkan country needs to establish a National Secretariat** within the Ministry for EU Integration or equivalent to be responsible for reporting, and a **National Focal Point** to be responsible for coordination, reporting and communication under the Progress Reporting Agreement.
- Demonstration of high-level political will to implement the Green Agenda should be **mainstreamed into existing regional ministerial meetings** such as EU–Western Balkan summits and Berlin Process summits rather than separate ones under RWG Env. This appears to be happening in reality now but it was not clear in the Action Plan.
- **The status of the Biodiversity Task Force needs to be clarified, and if necessary a new advisory body for biodiversity formed.** If the Task Force still exists, information about how to become a member, when meetings are held, agendas, minutes, and what deliverables are planned and implemented needs to be published.
- **The updated Action Plan also needs to include a clear timeline and responsibilities for all the governance aspects,** just as with the thematic pillars.

### Participation of civil society

According to the Action Plan, civil society should play a significant role in the whole GAWB process through the NGO Forum, consisting of groups identified by the RCC who would meet twice a year before the RWG Env meetings.

These were good intentions, but apart from drawing up a list of organisations, appointing the first Chair of the NGO Forum, and holding a meeting in Belgrade in March 2023, most of what is written in the Action Plan has not happened. We understand that the coordinator at RCC has changed and a civil society liaison person has been appointed in the meantime, and we don't want to dwell excessively on the past, but in order to find a better approach, we find it important to briefly state why the original one has not worked.

- Apart from producing an Action Plan and revising it, the Green Agenda planning process has not been made clear, e.g whether and by when the countries had to produce national or sectoral action plans, when the RWG Env meetings would be and what would be discussed. Having a clear plan and timetable is the first and most important condition for NGO participation. If we know what is planned when, we can largely identify our own opportunities to contribute or monitor.
- The list of NGO participants was envisaged in the Action Plan as '*a living document that can be revised to include other NGOs*'. But as far as we know, the RCC did not set criteria for what type of organisations could be included and how to join if your organisation was not already part of the list.

As a result, some relevant NGOs were not included while some less relevant ones<sup>2</sup> were, and it was not clear who could decide to change this and based on what.

- The first task for the NGO Forum was commenting on the Action Plan two weeks before it was adopted, which did not get the cooperation off to a good start.
- Towards the end of 2021, the RCC mentioned the idea of holding a Forum meeting to the NGO Forum Chair. But since the Action Plan had already been adopted, it was not clear what the next steps in the process were and the idea came late during a busy period, the idea did not meet great enthusiasm among the NGOs involved.
- After that, there was a gap<sup>3</sup> until the [NGO Forum meeting in Belgrade](#) in March 2023. Many of us hoped to finally get clarity there on how the Forum would operate, but neither the RCC nor the Commission was able to provide a list of further steps. Overall it sounded like the meeting was a one-off and the CSO involvement section of the Action Plan was no longer valid. An RCC representative appeared to argue that regional CSO consultations are not necessary as consultation should be done on the national level, which we completely disagree with: both are important, particularly because the input from national consultations is so rarely taken into account.
- A major focus in Belgrade was the Implementation Report, but no opportunity was given for NGOs to feed into it, either via a consultation with questions on implementation or by commenting on the draft. Admittedly it would have been difficult to provide quality comments due to the vagueness of the Action Plan, but we hope this will be rectified with the Action Plan update.

Given the above, **the CSO involvement section of the updated Action Plan therefore needs an overhaul** as follows:

- **The NGO Forum should be revived and criteria need to be set** for the type of organisations which can be involved, what is expected from them, and how organisations can get involved who are not already on the list. Given the lack of clarity in the section on youth and vulnerable groups (see below), a clear decision needs to be taken on whether they should be specifically encouraged to join the NGO Forum or included via other bodies or processes.
- **A more structured format should be considered.** In reality, not everyone has equal capacity to get involved and earlier practice showed that in addition to the chairperson, an informal group of more closely involved NGOs evolved. The Forum could consist of a core group of 2-3 national representative NGOs working on different relevant aspects and a wider group participating more sporadically.
- If this is the case, an easily accessible communication channel with the national representative organisations is a must; a mechanism is needed to ensure that they represent the positions of the

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<sup>2</sup> E.g. some that don't work in the region, some that are more consultancies than NGOs etc.

<sup>3</sup> With the exception of an NGO representative being invited to the January 2022 ministerial meeting. However, the meeting was cancelled in the end.

wider environmental NGO community, or at least that other NGOs and the public can contribute their opinions directly (e.g. see below).

- If the NGO Forum becomes more active, with a clear plan of action and calendar, support via a TACSO call should be considered for organisations' participation in the activities, as well as for independent national monitoring bodies with clearly defined criteria and responsibilities and inclusion of all relevant stakeholders including civil society. Although IPA calls on the Green Agenda have been published, these only help a very small number of groups to become active.
- **Basic information about the NGO Forum needs to be put online**, including contact details, activities, criteria for joining and details of ongoing public or CSO consultations. This can also incorporate a digital space where Forum members, the NGO community and the wider public can contribute.
- **All major Green Agenda documents must be publicly consulted**, including Implementation Reports, Action Plan updates (see specific proposals [here](#)) in line with the standards defined in the Aarhus Convention and associated relevant Compliance Committee decisions. This should also be specified in the revised Action Plan.
- **Live meetings could be useful when specific NGO input is needed** and sufficient advance notice should be given – at least six weeks. They should not be large plenary conferences like the Belgrade meeting but rather organised into structured discussion groups. However, people's limited capacity for travel should be considered and other meetings can take place online if needed.

### Participation of local self-governments

The participation of local authorities is crucial but does not seem to be happening in reality, with many people having heard 'Green Agenda' as a buzzword, but few really knowing what it is. This is particularly a missed opportunity for carbon-intensive regions which need an extra boost to redevelop in a more sustainable way. We are not sure whether the planned Green Agenda Days have ever happened, but a quick online search revealed nothing, so we assume not.

It is up to the local authorities themselves to define how they would like to be involved, so we will not offer concrete proposals. We will just underline how important it is, as they are too often sidelined in national-level decision-making and when applying for IPA funds. Their participation is crucial for areas like energy efficiency and district heating, but they often [lack capacity](#) to approach international donors with developed projects.

The low absorption capacities of local authorities is an under-discussed topic, and more concrete commitments are needed as part of the Action Plan, e.g. local authorities hiring and/or training staff to work solely on GAWB topics, raise funds for projects etc.

### Donor coordination platform and financing of the GAWB

Again, we do not know if the planned annual meetings happened, or whether donors are regularly involved in RWG Env meetings. In any case, they should be involved in whatever coordination mechanism exists.

However, what would be very useful is to have a **database of GAWB-related projects online** (see below under Monitoring system/Reporting) as it is otherwise completely unclear how many such projects are currently ongoing and how they are contributing to the Action Plan's goals. Without such a database, it is also very difficult to understand what difference the GAWB is making compared to pre-existing mechanisms such as the Western Balkans Investment Framework or bilateral donor funds.

### Participation of the business community, youth and vulnerable groups including Roma

This section of the Action Plan is a strange mixture, as the business community, women, youth and vulnerable groups are hardly in the same position as one another. The text is also purely aspirational, with no concrete measures envisaged.

We do not believe that special measures are needed to involve business except what has already been mentioned about publishing clearer information about the Green Agenda, its various steps and implementation. Based on such information, businesses can identify their own opportunities to be involved.

For youth and vulnerable groups, again it is up to them to define how they would like to be involved, so we would refrain from making concrete proposals here, except to recommend that the RCC specifically reaches out to relevant organisations when updating the Action Plan.

### Monitoring system/Reporting

The 2022 Implementation Report clearly shows that monitoring and reporting need to be redefined in the revised Action Plan, as almost none of the actions are measurable and the Report does not distinguish between actions implemented under the auspices of the Green Agenda and those done by someone else at some other time with some other funds.

If the goal is to transform the Western Balkan economies and align them with the EU Green Deal, this transformation has to be duly monitored and evaluated on both national and regional level. As presented in our comments on the Action Plan pillars, the indicators need to be revised but it also needs to be specified **who is responsible for monitoring**. For example, as also mentioned above under *Participation of civil society*, **national monitoring committees** could be formed for each of the five pillars in order to ensure independence.

As discussed under *Governance*, a **combination of reporting by national governments and fact-checking by independent monitors** such as civil society is needed, with the RCC compiling the information regionally to make up the annual Implementation Report. From the [EU4Green website](#), it appears that some kind of work on national-level monitoring is ongoing, but it is not clear exactly what, and it will need to be adjusted after the Action Plan revision.

In the existing Action Plan, the RCC committed to develop a **GAWB Observatory** to provide a visual presentation on the Sofia Declaration implementation progress. This is certainly needed, but could be used **not only for presenting but also reporting** by national authorities. This should include:

- **Western Balkan- and country-specific actions, deadlines and indicators** to measure the progress of the Action Plan implementation. It should also include annual and quarterly progress indicators to prevent delays in achieving milestones.

- **A database of Green Agenda-related projects**, including information on the source of financing, the number of the national budget line or the number of international or EU support, and the name of the party responsible for the implementation of each measure or action.
- **A reporting portal**, as the standard way of implementing the Progress Reporting Agreement proposed above.

This can then be used by the RCC to compile a draft Implementation Report which should be available for comments from civil society, local authorities and other stakeholders and the wider public. **The Implementation Report must cover all aspects of the Action Plan, including the governance sections**, which was not the case with the one published in 2023.

## Indicators

Although it is useful to have an overview of how the countries are progressing overall, beyond what can be attributed to the Green Agenda, this seems to be needless additional work for the RCC that is partly already done by others such as the Energy Community Secretariat, Eurostat, the International Energy Agency, the European Commission and NGOs. **If these overall indicators are retained, the number of them should be reduced and only the most meaningful ones retained.** We therefore propose the following.

To keep/adjust	To abolish
Total GHG emissions (tonnes of CO2 eq) <b>plus year-on-year comparison to 1990 or other baseline levels and 2030 targets.</b>	The number of sectoral policies that include climate change adaptation – <b>lacks quantitative dimension.</b>
GHG emission intensity of power generation (tonnes of CO2 eq) <b>plus year-on-year trend, regional and EU average.</b>	Level of climate financing – <b>lacks quantitative dimension.</b>
Implementation ratio renewable energy – <b>Change to: Share of renewable energy in electricity year-on-year compared to 2020 and 2030 target.</b>	Implementation ratio electricity – <b>link to environmental improvements too indirect</b>
<b>Transport: Introduce indicators on modal split for freight and passenger transport</b>	Implementation ratio gas – <b>gas is a fossil fuel, not part of the Green Agenda!</b>
Domestic material consumption per capita.	Transport: Relevant directives/regulations/standards/specifications transposed – <b>link to environmental improvements too indirect</b>
Domestic material consumption	Transport: Western Balkan Strategies updated with sustainable and smart elements – <b>Too unmeasurable</b>

Resource productivity	Infrastructure developed according to TEN-T (related to green elements) – <b>Too unmeasurable and tenuously linked to sustainability in case of roads.</b>
Generation of waste	Artificial land cover per capita by type – <b>Interesting but not sure it provides a clear message.</b>
<b>Add: Municipal waste recycling rate</b>	Production of renewable energy from agriculture – <b>rather niche.</b>
Annual ambient concentrations of PMs, SO2 and NOx	GHG emissions from agriculture (tonnes of CO2 eq) – <b>if kept, data should be provided for other main sectors as well.</b>
Annual emissions of PMtotal, PM10, SO2 and NOx from large combustion plants – <b>delete PM10 as Energy Community reports do not show this.</b>	Number of farms and food processing enterprises receiving (IPARD) support to align with hygiene and animal welfare standards – <b>lacks a qualitative element.</b>
Annual emissions of NH3 and NMVOC	
Population connected to public water supply (%)	
Population connected to wastewater treatment plants (%)	
Nitrate in groundwater.	
Share of the area under organic farming in the total utilised agricultural area	
Share of land under management requiring reduction in chemical input.	
Mean organic carbon content in agricultural land	

### Communication, awareness raising and citizen participation

Communication and public participation should be a key part of the Green Agenda. However, this section of the Action Plan is mainly aspirational and currently rings rather hollow in a situation where even avid civil society followers of the Green Agenda are not able to explain what the next steps in the process are and how the public can be involved.



In the Action Plan update, this section should be much more down to earth and realistic, concentrating mainly on the basic steps needed for transparency and accountability towards the public, as outlined above, as well as outreach to specific target groups such as local authorities, youth, women and vulnerable groups.

**These proposals are endorsed by the following groups:**

CEE Bankwatch Network



EcoZ,  
Kosovo



Environmental Citizens' Association Front 21/42,  
North Macedonia



Center for environmental research and information  
Eko-svest Skopje,  
Macedonia



Environmental center for Development Education and  
Networking (EDEN center),  
Albania



Protection and Preservation of Natural Environment in  
Albania (PPNEA),  
Albania



Center for Environment / FoE Bosnia and Herzegovina,  
Bosnia and Herzegovina



Network Albania,  
Albania



Group of Rural Activist of Dibra-GARD,  
Albania



Belgrade Open School,  
Serbia



Center for Economic Analyses – CEA,  
North Macedonia



The Resource Environmental Center (REC) Albania,  
Albania



Resource Environmental Center (REC) North  
Macedonia,  
North Macedonia



NGO Eco-team,  
Montenegro



Climate Action Network (CAN) Europe



Resource Environmental Center (REC) Bosnia and  
Herzegovina,  
Bosnia and Herzegovina



Resource Environmental Community (REC)  
Montenegro,  
Montenegro

