



OPINION

European Economic and Social Committee

Civil Society's Role in Supporting Reform under the Growth Plans for the Western Balkans and Moldova, as well as in Ukraine's Reform Path

Civil Society's Role in Supporting Reform under the Growth Plans for the Western Balkans
and Moldova, as well as in Ukraine's Reform Path
(exploratory opinion)

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1. **Conclusions and recommendations**

- 1.1 The three facilities for the Western Balkans, Ukraine, and Moldova together represent the EU's most ambitious attempt to make enlargement-driven reforms credible and irreversible through performance-based framework. Each facility supports the respective country's path towards EU membership or closer integration, linking funding to progress on fundamental reforms in rule of law, public administration and economic governance - the very pillars on which accession is built. All three facilities must actively practice civil society engagement as a structural condition that underpins the sustainability of the enlargement process.
- 1.2 The EESC highlights that civil society ownership of the three facilities-supported reforms should consist of a permanent, active, structured and formally institutionalised role for social partners and civil society organisations, alongside national authorities. Societal ownership is essential to maintain the legitimacy of and confidence in the EU enlargement agenda, as it helps ensure convergence between governments' self-assessments, the European Commission's disbursement decisions and the substance of the reforms. The long-term sustainability and credibility of reforms should be assessed not only through the attainment of indicators but also through citizen trust, understanding of reforms and of their expected impact, and perceptions of fairness and inclusiveness. In this context, the EESC notes that organised civil society in the Member States has itself experienced accession processes and can therefore pass on recommendations grounded in best practices and lessons learned.
- 1.3 The EESC stresses that deadlines should not undermine democratic procedures, public debate, mandatory consultation or dialogue with social partners and civil society organisations, nor be used as justification for emergency legislative shortcuts that exclude social partners and civil society organisations. These elements are essential to ensure the legitimacy, quality and sustainability of reforms.
- 1.4 The EESC points out that the engagement of social partners and civil society organisations should be systematic and their role formally embedded in legislation and operational guidelines. Governments should establish a structured framework for social dialogue ensuring the involvement of nationally representative, with an appropriate number of members, organisations of employers, workers and civil society organisations, while respecting the specific role and autonomy of social partners.
- 1.5 The EESC recommends clear, public European Commission's guidance on assessing the full and partial attainment of Reform Agendas' implementation indicators, including verification standards, and reversals of the conditions previously fulfilled. This ensures transparency, credibility, commitment and engagement, allowing civil society organisations, social partners, and regional and local authorities to meaningfully monitor and support the implementation of the Reform Agendas.
- 1.6 The EESC recommends ensuring tailored sustainable and predictable financial support for civil society organisations and social partners through multi-annual and transparent funding mechanisms, noting that direct support through the three performance-based facilities remains uneven across partner countries. Adequate funding is essential to empower civil society as a

core partner in reform implementation, safeguard civic space, enable meaningful participation in monitoring and policy dialogue, and strengthen the legitimacy, credibility, resilience and sustainability of reforms.

- 1.7 The EESC recommends strengthening monitoring frameworks under the three facilities, making partnership with civil society organisations, social partners and local and regional authorities a core standard, with mandatory criteria for monitoring committee composition and enforcement, and promoting structured exchanges with EU peers under the Recovery and Resilience Facility (RRF) to share lessons learned, including structural pitfalls to avoid low levels of disbursements and bureaucratic red tape, thereby enhancing efficiency, accountability, legitimacy and the impact of reforms.
- 1.8 As the Reform and Growth Facility (RGF) for the Western Balkans enters a critical mid-implementation phase, accompanied by potential revisions to Reform Agendas and a re-distribution of funding across the Western Balkans, it is essential that financial support is calibrated to its broader strategic purpose.
- 1.9 Funding should actively contribute to preparing countries for membership in line with the European social and economic model, and not be limited to supporting integration into the Single Market. Reform Agendas should include clear key performance indicators (KPIs) assessing the economic and social impact of reforms, such as investment levels, job creation, the digitalisation of public services, business registration time, regulatory implementation, and other indicators ensuring that reforms translate into tangible economic and social outcomes.
- 1.10 We invite the Commission to draw on mid-term assessments of current Facilities' governance and implementation frameworks – with a focus on inclusive monitoring committees, the engagement of civil society organisations and social partners, and robust verification and reporting standards - and further improve the implementation of current and future relevant EU performance-based Enlargement instruments.

2. **General comments**

I. **Enlargement as a geostrategic imperative**

- 2.1 The EU's enlargement policy underscores that EU membership is 'a geostrategic investment in a strong, stable, secure and united Europe based on common democratic values'¹. The EESC supports the reaffirmation of enlargement, based on credible reforms and on the principle of own merits.
- 2.2 The EU has urged Ukraine, the Republic of Moldova and the Western Balkans to sustain credible, merit-based reform efforts - particularly in the rule of law and democratic governance. At the same time the EU itself needs to step up its internal preparedness and reform efforts^{2,3}.

¹ [2025 Communication on EU enlargement policy](#).

² [EU-Western Balkans Summit - Brussels Declaration](#), 17 December 2025.

³ [Presidency conclusions on Enlargement](#), 16 December 2025.

The EESC welcomes the progress achieved in enlargement countries and underlines that sustained and credible reform efforts, as well as good neighbourly relations and alignment with the EU's Common Foreign and Security Policy, are essential to fully benefit from enlargement momentum and increased EU financial support needed for long-term development⁴.

- 2.3 Sustained and credible reform cannot rely on governments and institutions alone. The legitimacy and long-term viability of the enlargement process hinge on the active involvement of civil society as genuine stakeholders in shaping, implementing and monitoring reforms. The EESC therefore calls on the European Commission and national authorities to treat engagement not as a consultative formality but as a structural requirement for a credible, inclusive and irreversible enlargement process.

II. **Implementation of the Reform and Growth Facilities for Western Balkans, Moldova and Ukraine**

- 2.4 The EESC underlines that the successful implementation of the three performance-based facilities, as integral components of the EU's external economic governance and budgetary framework, is essential not only for advancing institutional and structural reforms. Their efficient operation ensures that EU-financed support delivers measurable, lasting convergence and inclusive growth in partner countries, in line with EU values and objectives.
- 2.5 The EESC notes that the implementation of the Reform Agenda under the Reform and Growth Facility (RGF) is advancing unevenly across the Western Balkans, requiring targeted public administration capacity-building roadmaps to address governance gaps. Albania, North Macedonia and Montenegro are in a more advanced implementation phase reflecting the endorsement of their Reform Agendas and initial disbursements linked to progress assessed across several reform areas. Implementation in Serbia, Kosovo⁵ and Bosnia and Herzegovina has progressed more slowly, reflecting differences in implementation readiness, ratification timelines, and governance and coordination structures.
- 2.6 As regards the Republic of Moldova, the Growth Plan and the Reform Agenda for the period 2025-2027⁶ constitute key pillars of a strategic framework aimed at accelerating the European integration process, of modernising the economy, and of strengthening country's social and institutional resilience. While the first phase of implementation has seen initial progress, the upcoming scale-up will require stronger reporting, verification, and communication systems.
- 2.7 Implementation of the Ukraine Facility is taking place under extraordinary wartime conditions. This situation increases the importance of independent verification, transparent public reporting and proportionate monitoring arrangements that can function across all covered territories, including war-affected and de-occupied areas, while safeguarding the civic space and anti-corruption institutions.

⁴ OJ C, C/2024/4065, 12.7.2024, ELI: <http://data.europa.eu/eli/C/2024/4065/oj> adopted on 25. 4.2024.

⁵ This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

⁶ [Reform Agenda under Moldova's Growth Plan for 2025-2027](#).

III. Civic space, dialogue and consultation standards

- 2.8 The EESC notes that consultation practices in several Western Balkan countries, Moldova and Ukraine remain uneven and poorly documented, highlighting the need for minimum standards for the quality of consultation and dialogue, as well as for follow-up and reporting. This shortcoming often stems from consultations being largely formal exercises that have little real influence on decision-making, revealing a gap between procedural requirements and actual practice. The participation of social partners and civil society organisations is, at times, limited to procedural compliance, with their input – including that of vulnerable groups – insufficiently reflected in final outcomes. In Moldova, consultative platforms exist across ministries, but their functionality, predictability, follow-up, and real influence on decisions vary significantly.⁷ In Ukraine, civil society and recent EU reports⁸ underline the need to protect watchdog and anti-corruption organisations and ensure that dialogue is continuous, safe, and meaningfully informs decision-making and disbursement-linked assessments.
- 2.9 The EESC underlines that structured dialogue among social partners and civil society organisations is essential to build trust, strengthen social cohesion and support effective reform and accession progress under the Growth Plan in the Western Balkans. It stresses that a functioning, adequately supported and protected civic space - including freedom of association and expression, access to information and the legal safeguards for the protection of watchdog and anti-corruption organisations - is a precondition for credible reform implementation. Without the involvement of genuinely independent and relevant social partners and civil society organisations, monitoring risks becoming merely pro forma and EU financial support may end up reinforcing systems that lack real accountability. Safeguarding civic space, including freedom of association, expression and access to information, is essential for ensuring that social partners and civil society organisations can effectively contribute to reform monitoring, policy dialogue and public accountability.
- 2.10 The EESC underscores the need to engage social partners, civil society organisations, the expert community, media organisations, academia, and regional and local authorities in the development, monitoring and implementation of the Reform Agenda, as well as in the monitoring of specific and intermediate indicators to measure the progress of the Moldova Growth Plan⁹. The EESC also underlines that social partners and civil society organisations should not only be involved in monitoring reforms but can also serve as valuable implementation partners in areas such as social inclusion, local development, anti-corruption, service delivery and community outreach, where they often possess unique expertise, local knowledge and public trust.

⁷ [Republic of Moldova 2025 Report](#). Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions.

⁸ [Ukraine 2025 Report. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions](#).

⁹ OJ C, C/2025/2965, 16.6.2025, ELI: <http://data.europa.eu/eli/C/2025/2965/oj>.

IV. Governance frameworks

- 2.11 The EESC calls for further strengthening and clarification of governance arrangements applicable to external instruments, including inclusive monitoring committees¹⁰, transparent and analytical scoreboards reflecting meaningful performance requirements, as well as effective independent monitoring across all covered territories, complemented by KPIs that are publicly accessible, regularly updated and designed to measure the economic and social impact of reforms. These measures are key to reinforcing transparency, inclusiveness and accountability, improving reform and investment tracking, and ensuring that policy objectives translate into verifiable and lasting results.
- 2.12 Building on the lessons learned with the three performance-based facilities, the EESC encourages the Commission to conduct structured consultations with partner authorities, social partners and civil society organisations of enlargement countries to identify potential improvements and integrate lessons learned into the ongoing design of the Global Europe Instrument. This approach should also inform the further development of gradual accession pathways, maximising the transformative and long-term impact of EU support.
- 2.13 With the growing use of performance-based financing in EU external support, strengthening the capacity of social partners and civil society organisations to engage with these instruments is essential for successful democratic oversight of future funding instruments and for meeting EU-related governance standards. The EESC underlines that adequate and predictable support to social partners and civil society organisations is vital to preserve social capital, sustain independent media and social partner engagement, and promote knowledge-sharing across candidate countries and with EU counterparts. In this framework, organised civil society must remain a core pillar of democratic governance and a partner in reform delivery.

3. Specific comments

I. Civil society as a governance requirement

- 3.1 The EESC considers that the engagement of social partners and civil society organisations must be treated as a core governance requirement of performance-based EU instruments, rather than as a complementary or ad hoc element, starting from the earliest stages of drafting the Reform Agenda, and continuing throughout its subsequent revision and monitoring. Structured, predictable and adequately resourced participation of civil society is essential to ensure ownership, reform credibility and legitimacy, and their long-term sustainability, in line with the values underpinning EU enlargement. It is also essential to strengthen societal vigilance against foreign information manipulation and cognitive warfare, while raising public awareness of the effectiveness of EU support as the largest donor in the Western Balkans, Ukraine, and Moldova.
- 3.2 For the remaining implementation period, the government reports submitted to the Commission should be made public in accessible formats enabling independent analysis, thereby supporting

¹⁰ Practices in the establishment of the Monitoring Committees differ from country to country, leading to varying standards and safeguards, which can affect the consistency, transparency, and effectiveness of oversight across the region.

informed engagement and consultation. Transparency in ensuring access to RGF government data should become a standard practice in the RGF monitoring and reporting cycle.

- 3.3 The EESC underscores the need to engage citizens, social partners, civil society organisations, the expert community, academia, and regional and local authorities in the independent monitoring and implementation of the Reform Agenda, based on specific and intermediate progress indicators. Particular emphasis should be placed on involving social partners and civil society organisations in the development of the plan's scoreboard¹¹.

II. Strengthening oversight and monitoring capacities

- 3.4 Parliamentary oversight of the Facilities currently relies mainly on general democratic accountability and EU accession-related scrutiny. The EESC calls for continuous, well-informed parliamentary scrutiny throughout implementation, supported by timely and detailed information on reform progress and financial execution. The establishment of new, or full use of existing, mechanisms for structured consultation between parliamentary committees and social partners and civil society organisations is recommended, enabling dual oversight of the transposition of EU legislation as well as the monitoring of RGF absorption and reform implementation outcomes, including through regular public hearings with social partners and civil society organisations.
- 3.5 Under the EU partnership principle, regional and local authorities should be meaningfully involved in monitoring, implementing, and supporting reforms and investments. Lessons from Member States' Recovery and Resilience Facility practices can inform the set-up and functioning of concrete mechanisms aimed at strengthening sub-national engagement, ensuring local perspectives are integrated and that reforms and investments achieve tangible results on the ground.
- 3.6 The EESC notes that while RGF monitoring committees exist in most Western Balkan countries, their governance and oversight functions remain underutilised. The focus of monitoring committees should include clear KPIs, early risk identification, qualitative assessment of reform progress in priority areas and follow-up on mitigation actions, rather than only procedural validation. Systematic input from social partners and civil society organisations is needed to strengthen accountability, legitimacy, and reform impact. Greater engagement of local and regional authorities remains key for balanced territorial coverage and alignment of reforms with development objectives.
- 3.7 The EESC notes that civil society in Moldova values the Reform Agenda's coherence and authorities' openness to consultation. However, the EESC underlines that ad hoc consultations should evolve into permanent, structured mechanisms with formalised feedback from authorities, involving social partners and civil society organisations, the Parliament, and the Government to ensure meaningful participation, effective monitoring, and a strong commitment to participatory governance and European integration.

¹¹ OJ C, C/2025/2965, 16.6.2025, ELI: <http://data.europa.eu/eli/C/2025/2965/oj>.

- 3.8 The EESC underlines that challenges in design and implementation capacity have become more evident in the first year of execution, affecting the timely and effective delivery of reforms and investments¹². In the remaining implementation period, the EESC urges the Commission to deploy timely qualitative assistance to support the strengthening of partner Governments' coordination, reporting, evaluation and communication capacities. The EESC stresses that complementary and adequate support should directly reach social partners and civil society organisations and regional and local authorities to strengthen accountability, leverage local knowledge and ensure reforms deliver tangible results on the ground.
- 3.9 Building on these capacity challenges, the EESC draws attention to the risk of a governance gap, where available financial resources may not be fully utilised due to limited administrative coordination, weak monitoring and reporting systems, insufficient public communication, and inadequate structured involvement of civil society¹³. If unaddressed, these gaps could cause implementation delays, reduce effectiveness, and increase public resistance, which calls for the development of targeted risk mitigation and capacity-strengthening plans. The mid-term revision opportunity should be used to conduct an evidence-based assessment of these governance deficits.

III. Strengthening transparency, accountability, and lessons for future EU financial instruments

- 3.10 The RGF links payments to the fulfilment of quantitative and qualitative Reform Agenda steps, with partial disbursements possible for the former and full completion required for the latter. The European Court of Auditors¹⁴ has recommended that the Commission develop guidance for assessing fulfilment of the payment conditions and potential reversals of the conditions previously fulfilled, as no comprehensive European Commission guidance exists. The EESC considers that clear and public guidance – covering verification standards, treatment of partial fulfilment and reversal procedures, as well as assessment of the fulfilment of pre-/general conditions – would strengthen transparency, accountability and civil society engagement for the remaining implementation period¹⁵. The EESC welcomes the fact that this issue is once again addressed in the latest Opinion on the Global Europe Instrument issued by the European Court of Auditors¹⁶.
- 3.11 The EESC stresses that, as implementation progresses, informed public debate regarding the implications of the grant-loan ratio and the long-term fiscal effects of Facilities-supported reforms and investments should take place to maintain reform ownership, legitimacy, public confidence, and alignment with enlargement countries' absorption capacity and macroeconomic resilience. The EESC also emphasises the importance of transparent, clear and accessible public

¹² As of 19 March 2026, the RGF WBs achievement rate stands at around 6% for steps due in June 2025, compared with the due 19% envisaged in the approved calendar. Data refer to the information published in the European Commission's [RGF Scoreboard](#).

¹³ [Republic of Moldova 2025 Report](#).

¹⁴ [Opinion 01/2024, concerning the proposal for a Regulation of the European Parliament and of the Council on establishing the Reform and Growth Facility for the Western Balkans](#), February 2024.

¹⁵ [Albanian Reform Agenda Progress Report: October 2024 – June 2025](#), Cooperation and Development Institute, October 2025.

¹⁶ [Opinion 07/2026 on Global Europe](#), February 2026.

communication on reform objectives, progress and financial implications, which is essential to strengthen public understanding, build trust and counter disinformation. Lessons from current Facilities loan management and financial transparency should inform the design of the post-2027 Global Europe Instrument, ensuring the financial framework supports, rather than burdens, candidate countries' convergence and fiscal stability.

3.12 The EESC stresses the need to learn lessons from RGF implementation in real time in order to inform future performance-based tools, as well as the post-2027 Global Europe Instrument.

Brussels, 29 April 2026.

The President of the European Economic and Social Committee
Séamus Boland
