

Western Balkans vis-à-vis the Trio: single market, cohesion and civil society for the gradual integration into the EU

Osservatorio Balcani Caucaso Transeuropa (OBCT)
Regional Action Lab (Re-ACT Lab)

Research team:

Luisa Chiodi, OBCT
Raffaella Coletti, CNR IStEG
Sokol Zeneli, Re-ACT Lab
Gentiola Madhi, OBCT
Gresa Smolica, Re-ACT Lab



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List of acronyms

Acronym	Full name
AA	Association Agreement
ACAA	Agreement on Conformity Assessment and Acceptance of Industrial Products
CBAM	Carbon Border Adjustment Mechanism
CEF	Connecting Europe Facility
CEFTA	Central European Free Trade Agreement
CFSP	Common Foreign and Security Policy
CORE	Corporate Resource for Europe
CSO	Civil Society Organization
DCFTA	Deep and Comprehensive Free Trade Area
EC	European Commission
ECJ	Court of Justice of the European Union
ECT	Energy Community Treaty
EESC	European Economic and Social Committee
ENI	European Neighbourhood Instrument
ENP	European Neighbourhood Policy
EU	European Union
ETS	EU Emissions Trading System
FTA	Free Trade Area
Frontex	European Border and Coast Guard Agency
GDP	Gross domestic product
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
GP	Growth Plan
IPA	Instrument for Pre-accession Assistance
MFF	Multiannual Financial Framework
MS	EU Member States
NDICI	Neighbourhood, Development and International Cooperation Instrument
QMV	Qualified Majority Voting
RGF	Reform and Growth Facility
SAA	Stabilisation and Association Agreement
SAC	Stabilisation and Association Council
SAP	Stabilisation and Association Process
SEPA	Single European Payments Area
STEP	Strategic Technologies for Europe Platform
TBTs	Technical Barriers to Trade
TFEU	Treaty on the Functioning of the European Union
TIA	Territorial Impact Assessment
WB6	Western Balkans 6

Foreword

by Luisa Chiodi

The geopolitical developments of recent years, made the perspective of gradual integration to the EU the new slogan. While the aspiration of full membership remains the goal of all candidate countries, gradual integration seems to offer an earlier and more tangible access to EU markets, programmes, institutions and financial resources. Yet gradual integration is still an evolving concept rather than a fully established legal or political model. Its meaning, its instruments and its relationship with the traditional accession process remain the subject of debate.

The three chapters of this research contribute to the debate by approaching gradual integration from three complementary perspectives. Together, the three papers ask not only how candidate countries can move closer to the European Union before membership, but also under what conditions such a process can be credible, effective and sustainable.

The first contribution by Sokol Zeneli and Gresa Smolica (Re-ACT Lab) examines the legal architecture of integration. By comparing the Stabilisation and Association Agreements governing the Western Balkans with the Association Agreements and Deep and Comprehensive Free Trade Areas concluded with the Associated Trio, it identifies a significant structural asymmetry.

The countries that have been waiting for membership for the longest period are in important respects governed by an older and more static legal framework, while agreements initially designed for “integration without membership” in the Eastern neighbourhood contain more dynamic mechanisms for regulatory approximation and sectoral market integration.

The comparison is particularly revealing when gradual integration is considered through three pathways: access to the Single Market, participation in EU institutions and agencies, and financial instruments. It suggests that the challenge is not simply to provide candidate countries with more opportunities, but to create sufficiently predictable and legally meaningful links between reforms and the benefits of integration.

The second paper by Raffaella Coletti (CNR ISTeG) places these developments within the broader transformation of the European Union itself. The debate on enlargement cannot be separated from the debate on the future of the Union’s budget, its priorities and its capacity to reduce territorial and economic disparities.

The proposals for the 2028–2034 Multiannual Financial Framework therefore offer an important lens through which to examine the future of enlargement and cohesion policy together. Both are being reshaped by a changing European context in which competitiveness, security and geopolitical resilience have acquired greater prominence.

At the same time, the future of cohesion policy matters directly for enlargement: the capacity of future members to participate in and manage European structural policies will be central to their ability to achieve economic, social and territorial convergence after accession. The paper thus highlights the importance of looking at enlargement not only as an external policy of the Union, but also as a process that requires profound preparation within the Union itself.

The third contribution by Gentiola Madhi (OBCT) adds a dimension that is indispensable to any discussion of European integration: societal ownership. Enlargement is not merely a process of legal approximation, institutional adaptation or financial conditionality. It is also a process of social and political transformation.

Civil society organisations have long played an important role in monitoring reforms, advocating for democratic standards, creating transnational networks and bringing national experiences into the European policy debate. Yet their role remains unevenly institutionalised across the different association frameworks. The emergence of the Growth Plans creates new opportunities for participation, but also raises questions about transparency, accountability and the extent to which consultation can move beyond ad hoc practices towards genuine participation in the design and monitoring of reforms.

Seen together, the three papers point to a broader conclusion. Gradual integration should not be understood simply as a technical intermediate stage on the road to membership. It is becoming a potential new architecture for the relationship between the European Union and countries aspiring to join it.

Such an architecture necessarily combines legal approximation, market access, institutional participation, financial support, territorial convergence and democratic engagement. Its credibility will therefore depend not only on the volume of resources or on the number of sectors opened to candidate countries, but also on the predictability of the link between reforms and rewards, the quality of institutions, the protection of the rule of law, and the participation of citizens and civil society.

This perspective is particularly important when comparing the Western Balkans and the Trio. Their histories, legal frameworks and political circumstances are different, and a single model cannot simply be transferred from one group to the other. Yet their simultaneous movement towards the European Union makes their comparison particularly instructive. It reveals both the opportunities created by the current momentum behind enlargement and the institutional inequalities that have accumulated over time.

The papers collected here therefore approach gradual integration neither as a substitute for accession nor as an end in itself. Rather, they explore if and how the period before membership can become more meaningful and more promising for the achievement of European integration. The ultimate test will be whether this approach can simultaneously accelerate convergence, sustain domestic reform and preserve the political credibility of the membership perspective.

At a time when the European Union is reconsidering both its internal architecture and its place in a changing geopolitical environment, the question of how to integrate future members is inseparable from the question of what kind of Union the EU itself seeks to become. This research offers three complementary perspectives on that question, and invites further discussion on how gradual integration can contribute to a more coherent, credible and inclusive European enlargement policy.

Pathways to gradual integration: A comparative analysis of the EU association framework

by Sokol Zeneli & Gresa Smolica, Re-ACT Lab

Introduction

The European Union (EU) enlargement process continues to be a complex task which has taken different shapes throughout the years. While the historic ‘big bang’ enlargement of 2004 and 2007 demonstrated the Union’s capacity to project stability and prosperity across Europe,¹ the subsequent two decades were defined by profound ‘enlargement fatigue’.² Driven by internal crises and concerns over absorption capacity, progress with the Western Balkans 6 (WB6)³ stalled dramatically, leading also to low willingness to progress with the foreseen reforms and accession path.⁴ Despite the formal Stabilisation and Association Process (SAP), and the reiterated European perspective for the region, their accession journeys devolved into a struggle with lengthy negotiations, domestic governance deficits often termed ‘stabilitocracy’⁵, bilateral disputes frequently instrumentalised by individual Member States (MS), and a sense of disillusionment described as a process without an end.⁶

Seeking to revitalise this stalled momentum, the European Commission (EC) introduced a revised enlargement methodology in 2020. The new methodology aimed to inject more dynamism in the accession process, more predictability, and a stronger political steer into the process by clustering negotiations chapters into clusters, and reinforcing the ‘fundamentals first’ principle⁷, ensuring that Cluster 1 (Fundamentals)⁸ opens first and remains open until the very end. Most notably, the 2020 methodology formally introduced two new principles: the principle of gradual integration (also referred to as phased or accelerated integration/accession) and the reversibility option.⁹ Gradual integration - also referred to as phased or accelerated integration - was designed to allow candidate countries to progressively participate in specific EU policies, markets, programmes and institutions before full

1 Dimitrova, A., et al.(2019) *Learning from Enlargement? Comparing EU Capacity Building and Monitoring under Enlargement with the Implementation of the Association Agreements*. EU-STRAT.

2 Esch, V. & Kabus, J. (2014) *EU Enlargement: Between Conditionality, Progress, and Enlargement Fatigue*. Aspen Institute Germany;

3 WB6 refers to the geographical area that consists of the following countries: Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia.

4 Mariacq, F. (2025) *Pragmatic, Gradual, Geopolitical: What’s Left of the Ambitions of the European Union’s Enlargement*. CIFE; Becker, P. & Lippert, B. (2024) *Acceding Countries’ Gradual Integration into the EU Single Market: Prerequisites, Opportunities and Hurdles*. German Institute for International and Security Affairs.

5 Bieber, F. (2018) *The Rise (and Fall) of Balkan Stabilitocracies*. *Horizon Journal of International Relations and Sustainable Development*, no. 10, pp. 176-85. JSTOR.

6 Bachev, D. (2024) *Can EU Enlargement Work?*. Carnegie Europe.

7 European Commission (2020) *Enhancing the Accession Process - A Credible EU Perspective for the Western Balkans*.

8 Cluster 1: Fundamentals includes Judiciary & Fundamental rights, Justice, Freedom & Security, Public Procurement, Statistics, Financial Control, Economic Criteria, Functioning of Democratic Institutions, and Public Administration Reforms.

9 Ibid, 7.

membership. The underlying logic was to offer tangible socio-economic benefits earlier in the process, thereby sustaining the reform momentum in candidate countries.

However, it was the dramatic geopolitical shift following Russia's full-scale invasion of Ukraine in 2022 that truly operationalised the concept of gradual integration in the 2020 methodology.¹⁰ Viewing enlargement as a geostrategic imperative, the EU granted candidate status to the Associated Trio (Ukraine, Moldova and Georgia) and Bosnia and Herzegovina while rapidly deploying new instruments, such as the EU Growth Plan (GP) for the Western Balkans and the Ukraine Facility, to drive integration through strict, conditionality-linked financial incentives and selective market access.¹¹ With this renewed geopolitical focus, the discussions regarding the EU's readiness for enlargement have intensified. Such debates focus on the necessity for internal institutional reforms - such as budgetary adjustments and potential shift towards Qualified Majority Voting (QMV) for intermediate enlargement steps - to ensure the Union can function effectively with new members.¹²

While gradual integration has become the central pillar of the current enlargement strategy, this must be operationalised through existing legal frameworks negotiated in entirely different eras for entirely different purposes. First, the Stabilisation and Association Agreements (SAAs), which are tailored for the WB6 countries within the SAP framework, aimed at post-conflict stabilisation and preparing countries for eventual membership.¹³ Second, the Association Agreements, including Deep and Comprehensive Free Trade Areas (AA/DCFTAs) concluded with Ukraine, Moldova and Georgia. These were initially conceived for deep integration without a membership perspective but have been politically repurposed as key pre-accession instruments following their application.¹⁴

This paper argues that relying on these distinct legal frameworks creates a structural integration paradox. The AA/DCFTA model inherently provides a significantly deeper and institutionally robust foundation for gradual integration due to its dynamic mechanisms. In contrast, the SAA relies on static, evolutionary clauses that require massive external policy intervention to convert regulatory alignment into tangible market access. To demonstrate this asymmetry, this study employs a qualitative, comparative legal and policy analysis. It draws upon a textual examination of primary treaty texts, specifically the SAA with Albania and the AA/DCFTA with Ukraine. The core analysis is contextualised through relevant secondary EU legislation, and policy documents.

The paper proceeds as follows: next section outlines the overarching EU association Framework and defines the operational logic of gradual integration. The core comparative analysis is then structured along three distinct integration pathways. Pathway I evaluates the capacity for economic integration into the EU Single Market, contrasting the static logic of market liberalisation of the SAA with the dynamic market access mechanism of the

10 Lippert, B., (2024) *EU Enlargement: Geopolitics Meets Integration Policy*. German Institute for International and Security Affairs;

11 You can read more about the EU Growth Plan for WB6 here: https://enlargement.ec.europa.eu/enlargement-policy/growth-plan-western-balkans_en

12 Zweers, W. et al., (2024) *Unblocking Decision-making in EU Enlargement: Qualified Majority Voting as a way forward?*. Clingendael, DGAP, and ELIAMEP.

13 Find more at: <https://eur-lex.europa.eu/EN/legal-content/summary/the-stabilisation-and-association-process.html>

14 Van Elsuwege, P. & Chamon, M. (2019) *The Meaning of 'Association' under EU Law: A Study on the Law and Practice of EU Association Agreements*. European Parliament Research.

AA/DCFTAs. Pathway II explores institutional inclusion, assessing how both frameworks facilitate access to EU agencies, programmes, etc. Pathway III analyses the financial architecture, charting the shift from standard capacity-building grants to the transformative, performance-based conditionality of the new generation financial instruments. The paper concludes by summarising the integration paradox and offering policy recommendations for bridging the structural gap between the two regions.

1. The EU association framework

In order to assess the potential for gradual integration, it is crucial to first understand the legal aspects governing the EU's accession process and their relationship with the two regions. Although both SAAs and AAs share a common legal basis under Article 217 of the Treaty on the Functioning of the European Union (TFEU), the political mandates and technical mechanisms embedded within them diverge significantly. It is exactly these structural differences that fundamentally shape the capacity of each framework to enable and facilitate gradual integration.

Stabilisation Association Process and Stabilisation Association Agreements

[Stabilisation and Association Process](#) and its legal instruments, the SAA's, constitute the EU's legal framework towards the Western Balkans. The SAAs were launched to stabilise the region in response to the aftermath of the Yugoslav wars, with the overarching goal of promoting political stability, fostering regional cooperation and establishing a free-trade area (FTA) - wrapped into the promise of eventual EU membership. However, it is worth noting that, as highlighted in their names, these agreements aimed mostly at political stabilisation rather than deep economic integration with the EU.¹⁵

SAA's were explicitly designed as pre-accession instruments. With this logic, through them, the EU acknowledged the 'potential candidate' status of WB6 countries¹⁶, thus establishing a clear link between the implementation of the agreement and progress toward EU membership.¹⁷ The primary goal of these agreements was to anchor the region in peace and stability through regional cooperation, with the trajectory toward membership in the EU. As such, the agreements generally prioritise political dialogue and regional stability over the technical mechanisms of integration.¹⁸

SAAs, among other things, focus largely on the liberalisation of the market, and the legal obligations for harmonising the national legislations of accession countries with the EU

15 Lehne, S. et al. (2025) *Access Before Accession: Rethinking the EU's Gradual Integration*. Carnegie Europe.

16 An important legal exception exists for Kosovo. Because five EU Member States (Cyprus, Greece, Romania, Slovakia, and Spain) do not recognise Kosovo's independence, its SAA was concluded as an "EU-only" agreement to bypass the need for national ratification. Furthermore, the agreement employs a status-neutral language: it purposefully omits the term "potential candidate" found in all other Western Balkan SAAs, referring instead only to Kosovo's "European perspective and rapprochement with the EU". You can read more at: Van Elsuwege, P. (2017). *Legal Creativity in EU External Relations: The Stabilization and Association Agreement Between the EU and Kosovo*. *European Foreign Affairs Review*, 22(3), 393-410.

17 Ibid, 14.

18 Becker, P. & Lippert, B. (2024) *Acceding Countries' Gradual Integration into the EU Single Market*:

acquis.¹⁹ It is worth noting that this legal obligation is best described as a soft or evolutionary measure. Generally, the SAA clauses oblige the partner country merely to ‘endeavour to ensure’ that its future legislation is compatible with the EU *acquis*.²⁰ Unlike the later agreements, the SAA lacks a mechanism to automatically update legal targets to fulfil this harmonisation. This is especially relevant considering the long years of the accession process and the evolving nature of the EU *acquis* in the last two decades.

Association Agreements / Deep and Comprehensive Free Trade Agreements

Unlike the SAA’s, the current AAs concluded with Ukraine, Moldova and Georgia represent a new generation of EU agreements. The main difference between these two types of agreements stems from the fact that the latter were born out of the European Neighbourhood Policy (ENP) and were originally intended as alternatives to EU membership, following a logic of ‘*integration without membership*’.²¹

Due to the lack of membership opportunity, the EU DCFTA was offered as a compensation mechanism for this region. This mechanism was built on the idea of ‘*sharing everything but the institutions*’, hence necessitating a far more detailed and rigorous legal framework to allow these non-members to participate in the EU Single Market.²² AA/DCFTAs were especially praised for their defining feature, the ‘*dynamic approximation*’ mechanism.²³ These agreements contain an extensive annex listing specific EU Regulations and Directives that the partner country must adopt within a set of deadlines. Most importantly, as seen in the case of the EU - Ukraine AA, there are specific articles that oblige the country to update its domestic legislation as the EU *acquis* evolves.²⁴ This allows the Associated Trio to be more synchronised with Brussels, compared to the WB6 countries, where such provision is not present.

Considering that these agreements were originally prepared with the idea of gaining access to the EU Single Market, rather than EU membership, they have been considered as more advanced than the SAAs when it comes to the legal approximation and reforms, as well as receiving the economic benefits of these reforms.

2. Gradual integration

Gradual integration, also referred to as ‘*phasing in*’ or ‘*accelerated*’ integration, represents one of the fundamental efforts of the European Commission (EC) in rethinking the EU

Prerequisites, Opportunities and Hurdles. German Institute for International and Security Affairs.

19 Nezirovic, S., et al (2022) *Stabilisation and Association Agreement between the Western Balkan Countries and the European Union*. Journal of Geography, Politics and Society, 12(2), p. 36-50.

20 Ibid, 17.

21 Dragneva, R. & Wolczuk, K. (2025) *Integration and Modernisation: EU’s Association Agreement with Ukraine*, in *Ukraine’s Thorny Path to the EU - From “Integration without Membership” to “Integration through War”* (Eds. Maryana Rabinovych and Anne Pitsch). Palgrave Studies in European Union Politics.

22 Van Elsuwege (2025) *Revisiting EU-Ukraine Association Agreement: A Crucial Instrument on the Road to Membership*, in *Ukraine’s Thorny Path to the EU - From “Integration without Membership” to “Integration through War”* (Eds. Maryana Rabinovych and Anne Pitsch). Palgrave Studies in European Union Politics.

23 Ibid, 21.

24 Art. 463 of EU - Ukraine AA/DCFTA.

enlargement process, presented in the new Enlargement Methodology 2020. In its core, the gradual integration aims to allow candidate countries that have completed demanding reform benchmarks to progressively integrate into (i) selected EU policy areas, (ii) participate in EU programmes, and (iii) most critically, gain access to parts of the EU Single Market prior to attaining full membership in the Union.²⁵ Given the general enlargement fatigue present in the enlargement process for the last 20 years, gradual integration was also brought up with the idea of incentivising the candidate countries to progress with their reforms (legal, institutional, economic and political ones).²⁶

It is worth noting that the gradual integration remains just a concept/approach, rather than a legal process regulated in any of the accession agreements. As a concept/approach, it is not meant as an alternative to full EU membership, and there are no formal links between it and the official and legal enlargement process. In itself, gradual integration is not linked to nor does it impact in any way the progress of countries in accession negotiations - opening or closing accession chapters - or vice versa.²⁷ The accession negotiations remain a legal and political process dependent on the fulfilment of conditions set in the accession agreements, and most importantly, the political will of MS not to block this progress.²⁸

Although there is no clear explanation from the EC on how gradual integration plays in real-life cases, its functional logic rests on 3 pillars:

1. *Sectoral Market Access* - aiming to grant early access to specific sectors of the Single Market (be it energy, transport, digital, etc.) once countries have adopted relevant *acquis*. Through this, the EU treats the candidate countries as member states within that specific sector.
2. *Institutional Inclusion* - aiming to allow representatives from candidate countries to attend EU Council meetings and working groups as ‘observers’ (formally or informally) to socialise them into EU decision-making processes.
3. *Financial Convergence* - aiming to increase pre-accession funds to a higher level in order to prevent economic shocks upon gradual accession into the EU and its structures.

Gradual integration is also strengthened by a critical safety valve through which benefits can be immediately withdrawn if a country backslides on fundamental reforms, particularly regarding the Rule of Law. This has been largely promoted and discussed in the process of the gradual integration of the WB6 countries.²⁹ However, it must be noted that gradual integration implies different operational realities for the two regions analysed in this paper, mainly due to their distinct legal provisions in place.

For the Associated Trio, a gradual integration path was provided before they actually received the candidate status. As it was mentioned earlier, the AA/DCFTAs were originally designed to offer ‘integration without membership’, as an alternative to accession. They are

25 Ibid, 15.

26 Buras, P., et al. (2025) *Gradual Integration: Bringing Aspiring Members Closer to the EU*. Think Tank Europa and European Council on Foreign Relations.

27 Ibid, 26.

28 Zeneli, S. & Smolica, G., (2024) *Navigating the EU Conditionality in the New Growth Plan for the WB6*. RE-ACT Lab.

29 See more at footnote 11.

built on a ‘dynamic approximation’ clause that, by default, facilitates deep sectoral integration.³⁰ Therefore, for this region, gradual integration, in essence, means the full implementation of the agreements they signed.

Whereas the WB6 region faces a different reality. For them, the gradual integration is a remedial process. The SAAs determining their accession process are of an older generation of agreements and lack the ‘dynamic’ mechanism for deep market integration we find in the DCFTAs. In light of market integration necessity, the EC introduced the EU New Growth Plan as a supplementary political instrument to retroactively grant the WB6 market access similar to that provided to the Associated Trio through the DCFTAs. This difference is of utmost importance. While Associated Trio is integrating into the EU and its Single Market primarily through their legal agreements, the WB6 region is advancing its integration through the new aspects introduced into the Growth Plan, which, in essence, remains a financial instrument rather than a legal process/agreement.

The three pillars of the gradual integration mentioned above will be used as pathways to integration to orient the comparative analysis between the two accession agreements, the SAA on the side of WB6 countries and the AA/DCFTAs on the side of the Associated Trio countries.

3. Integration pathways

3.1 Pathway I: Gradual integration to the EU Single Market

Potentially one of the most interesting and advantageous pathways of integration for both the EU and candidate countries is economic integration. This pathway is largely predicated on a simple logic: the candidate country adopts the EU *acquis* in a specific sector, and in return, the EU removes technical barriers to trade, effectively treating the partner as a member state within that specific sector of its market. Although it sounds simple on paper, this pathway operates fundamentally differently under the two legal frameworks analysed in this paper.

The next sections will explore and compare the potential of operationalisation of this gradual integration in both legal frameworks, focusing on several elements of the gradual integration into the EU Single Market.

The four freedoms

Free movement of goods

By far, the most tangible test of gradual integration into the EU Single Market remains the removal of the Technical Barriers to Trade (TBTs) for industrial products. As such, it is particularly this area where sharp distinctions can be drawn between the AAs/DCFTAs and

30Petrov, R., et al. (2015) *The EU- Ukraine Association Agreement: A New Legal Instrument of Integration Without Membership?*. Kyiv-Mohyla Law and Politics Journal, 1(1), p. 1-19; Van der Loo, G., (2016) *The EU-Ukraine Deep Association Agreement and Deep and Comprehensive Free Trade Area. A new Legal Instrument for EU Integration without Membership*. BRILL.

SAAs.

The DCFTAs provide a '*visa-free sectoral regime*' through the mechanism of the Agreement on Conformity Assessment and Acceptance of Industrial Products (ACAA).³¹ This defines the legal mandate explicitly. Article 56 of the EU - Ukraine AA requires full alignment with EU technical regulations and quality infrastructure. Crucially, Article 57 stipulates that once this alignment is verified, an ACAA must be added as an additional Protocol to the agreement. In simple terms, this creates a mandatory roadmap: once the technical steps are completed by Ukraine, the removal of barriers is a treaty right, effectively treating Ukrainian goods as if they were produced in the EU. In essence, this would allow Ukrainian industrial goods to enter the EU Single Market without additional conformity testing, effectively eliminating Technical Barriers to Trade and treating Ukrainian factories as if they were in the EU.

In comparison, the potential for Single Market integration within the SAA framework has generally been limited. However, the SAAs are not completely legally barren in this context.³² For example, Article 80 of the Albanian SAA actually allows for the conclusion of ACAAs. However, what is different, and to a large extent missing in the SAA regime, is the absence of a binding roadmap to activate these clauses. In essence, while the DCFTA acts as a legal automation triggering market access upon alignment (dictating the creation of the ACAA protocol), the SAA provisions are enabling rather than mandatory (they permit the negotiation of an ACAA, but do not legally foresee the requirement for the EU to grant one upon alignment). In practical terms, without an ACAA, even if an Albanian manufacturer perfectly aligns its products with EU safety and quality standards, those goods cannot automatically enter the Single Market; they must still undergo costly and time-consuming re-testing and certification by an EU-recognised body at the border before they can be legally sold in the EU.

Right of establishment and freedom to provide services

Similarly, there is an extensive divergence in the services sector, highlighting a structural gap between 'market liberalisation' and 'market integration' logics.

The DCFTAs offer 'Internal Market Treatment'³³ in specific service sectors, which goes beyond simple non-discrimination to grant 'national treatment'. This means that once Ukraine implements the *acquis* listed in the annexes, a Ukrainian company is treated legally as an EU company within that sector. A prime example of this is the Telecommunication services - Ukraine's alignment with the European Electronic Communications Code³⁴ led to a formal update of Appendix XVII-3, legally paving the way for Ukraine to join the 'Roam-Like-At-Home' area.³⁵

The SAA, by comparison, operates in a more limited logic. Article 50 of the Albanian SAA

31 ACAA is a type of Mutual Recognition Agreement which allows industrial products, which have been certified as compliant with relevant standards in one country, to be placed on the EU market without undergoing conformity assessment procedures. The ACAAs are primarily used to remove non-tariff barriers to trade.

32 Sretic, Z. (2023) Sectoral Integration Opportunities in the SAA Regime. The Case for the Internal Market Treatment of Products. CEPS.

33 Annex XCII of EU-Ukraine AA/DCFTA

34 Art. 102 of EU-Ukraine AA/DCFTA

35 Ibid, 22.

grants the ‘Right of Establishment’, allowing EU companies to set up subsidiaries in Albania (and vice versa) on a non-discriminatory basis. However, Article 59, which governs the cross-border supply of services, is weak: it merely obliges the Council to “*take the necessary measures*” to progressively allow supply without granting the rights necessary for services to flow freely without a local branch.

The Roam-Like-at-Home initiative serves as a good comparative example, illustrating the divergent legal mechanisms in action. Unlike in the case of Ukraine, where alignment with the European Electronic Communication Code as part of their DCFTA annexes, in the case of WB6 achieving the Roam-Like-at-Home remains an ongoing, ad-hoc process. The extension of this initiative relies on a separate, voluntary agreement signed between the EU and regional telecommunications operations. This agreement mandates a phased reduction of price caps, with the ultimate goal of fully eliminating additional roaming fees only by 2028.

Table 1: Comparative mechanisms between AAs and SAAs for gradual integration to the EU Single Market

Feature	AA/DCFTAs	SAAs
<i>Approximation Logic</i>	Dynamic (Art. 463): Require continuous alignment with the evolving EU Law.	<u>Evolutionary:</u> Obligation to ‘endeavour to ensure’ compatibility (Art. 70). No automatic update mechanism.
<i>Industrial Goods</i>	ACAA conclusion is a mandatory protocol once technical alignment is verified (Art. 57).	Allows for mutual recognition agreements (ACAA) but requires political activation (Art. 80)
<i>Services</i>	Annex XVII grants national treatments in sectors like Telecoms and Postal Services.	Right of Establishment (Art. 50): Prevents discrimination but lacks internal market treatment for cross-border trade.
<i>Dispute settlement</i>	Binding arbitration with mandatory reference to the European Court of Justice (ECJ).	Political resolution in the SAA council

Free movement of capital and persons

While the movement of goods and services is largely a story of TBTs and regulatory alignment, the movement of capital and persons touches on core national interests and sovereignty. Therefore, both the SAA and AAs approach these freedoms with caution.

In the discussion of the movement of capital, the SAAs operate on a logic of phased liberalisation. More concretely, Article 60 of the Albanian SAA mandates the immediate freedom of direct investments and the liquidation of those investments. However, for other forms of capital movement (e.g. portfolio investments, financial loans and credits), the agreement does not grant immediate freedoms. Instead, Article 61 established a strict timeline, stipulating that Albania shall grant these freedoms only “*as from the expiry of four years*” following the entry into force of the agreement. This approach is a reflection of the stabilisation logic of the agreement itself.

In contrast, the AA/DCFTA of Ukraine approaches capital movement not just as a financial freedom but as a regulatory obligation. Article 145 guarantees the free movement of capital regarding direct investments and credits. However, unlike the SAA, which focuses on the timing of liberalisation, the DCFTA focuses on the rules governing that capital. The agreement explicitly links capital movement to the ‘dynamic approximation of the EU’s anti-money laundering regime and counter-terrorism financing *acquis*’.³⁶ In comparison to the SAA, which allowed the capital flow after a waiting period, the DCFTA mandates that Ukraine adopts the EU’s entire protective system as a prerequisite. As such, this creates a fundamentally different environment; under the SAAs, WB6 countries liberalise capital into a national regulatory framework, whereas the Eastern Trio, under the DCFTAs, effectively extend the EU’s financial regulatory border to include the partner country.

In terms of the free movement of people, this remains a red line in both legal frameworks. Neither region is granted full access to the EU labour market, with slight differences between the two.

The SAA generally establishes the principle of non-discrimination for free movement of people, but it is strictly limited to workers who are already legally employed in the territory of a Member State.³⁷ It explicitly states that access to employment remains subject to the “*conditions and modalities applicable in each Member State*”. In essence, the SAA offers protection to the diaspora but provides no legal mechanism for new labour migration at the EU level. Nevertheless, several member states have bilateral agreements with the WB6 countries, regulating the free movement of workers. This has also been criticised in several accounts due to its impact on the brain drain of the region.

The AAs also contain similar restrictions regarding general labour movement, but it has a critical loophole on services that, in a way, functions as a partial substitute for free movement. This loophole is found in the mechanism of ‘Mode 4’ (Movement of Natural Persons for Business Purposes), or as known in international trade: the temporary movement of professionals for business purposes. Article 85 of the Ukraine AA grants a legal right of entry and temporary stay for specific categories of professionals: key personnel (managers and specialists), graduate trainees and business service sellers. This advantage is best understood under the economic needs test - the standard protective immigration rule where a government denies visa to a foreigner if there are qualified local citizens available to do the job.

Under the SAA, professionals in WB6 are entirely subject to the economic needs test. However, the DCFTA, under Article 85, effectively strips away this requirement.. In simple terms, it limits or completely waives the right of EU Member States to apply an economic needs test to specific categories of Ukrainian professionals. This creates a critical practical difference between the two agreements. While a Ukrainian factory worker has no more rights than an Albanian one, a Ukrainian software engineer or corporate manager has a treaty-based right to enter the EU and provide a service, bypassing local labour protections. Whereas, the Albanian engineer, lacking such treaty protection, remains at the mercy of standard, often restrictive, national visa bureaucracies and can be easily blocked to protect local jobs.

Table 2: Comparative provisions on free movement of capitals and persons

³⁶ Annex IX of EU-Ukraine AA/DCFTA

³⁷ Article 46 Albania - EU SAA

Feature	AA/DCFTAs	SAAs
<i>Capital Liberalisation</i>	Immediate liberalisation linked to strict alignment with the EU Anti-Money Laundering rules (Art. 145).	Direct investment is immediate; portfolio investment and loans are delayed (Art. 61).
<i>Workers (General)</i>	Focus on visa-free travel and readmission; no general rights of entry for workers (Art. 19)	Protects existing legal workers only. No right of entry (Art. 46).
<i>Business Mobility</i>	Grants the right of temporary stay for several categories to provide services (Art. 95)	Entry is subject to the laws of Member States; no specific key person guarantees.

Beyond the four freedoms: The second layer of EU Single Market

Deep integration requires a level more than just the removal of border controls. While the ‘Four Freedoms’ represent the opening of the market, this second layer represents the rules of the game that ensure fair play. Without concrete measures on Competition Policy (specifically State Aid) and Public Procurement, the removal of tariffs and quotas would be economically dangerous. It is particularly in this area where the distinction between free trade and integration is most evident. In a standard free trade agreement, parties agree to general principles of non-discrimination. In the Single Market, however, members surrender a degree of regulatory sovereignty to ensure a ‘level playing field’.

Competition policy and state aid

The litmus test of integration in this domain of the EU Single Market is State Aid control. In this context, the EU requires that any government support to industry (subsidies, tax breaks) is monitored by an independent authority to ensure it does not distort trade between member states.

In the case of Ukraine’s AA, the agreement does not merely ask the country to adopt EU competition principles; it requires the establishment of an operationally independent State Aid regulator with power mirroring those of the EC (Directorate General for Competition - DG COMP).³⁸ However, the critical divergence lies in the judicial enforcement. Art. 264 obliges Ukraine to interpret its competition law “*in conformity with the case law of the Court of Justice of the European Union*” (ECJ). This is a significant legal commitment: it effectively exports the EU’s judicial sovereignty to Kyiv, ensuring that a subsidy deemed illegal in a Member State is also deemed illegal in Ukraine, based on the same ECJ precedents.

The SAAs, in comparison, approach the competition policy through a more diplomatic lens. Article 71 of the Albanian SAA declares that any state aid which distorts competition is incompatible with the functioning of the agreement. However, the assessment is based on the loose criterion of applying “*the rules of the Community Treaties*”, without the binding explicit link to ECJ case law found in the AA/DCFTA.

³⁸ Art. 253 of EU - Ukraine AA/DCFTA.

In general, such ambiguity has allowed the WB6 governments to maintain State Aid Commissions that lacked operational independence, often approving subsidies that would be illegal in the Single Market. The SAA provides no legal mechanisms for the EU to challenge these domestic decisions short of suspending the agreement - a rather extreme action which was never used.

Public procurement

Public procurement accounts for a significant share of the GDP in the EU, representing a massive market segment. Access to this market is itself an ultimate test of mutual trust between the EU and candidate countries.

In the AA/DCFTA, public procurement access is treated not as a binary switch but as a graduated ladder. Article 153 of the Ukraine AA provides a clear five-phase roadmap. The logic is strictly reciprocal and conditional: Ukraine gains access to EU tenders (e.g., the right to bid on a Member State infrastructure project) only as it completes specific legislative phases and institutional reforms. This 'more-for-more' mechanism provides a powerful domestic incentive for reform. Under such conditions, the Ukrainian businesses have the incentive to pressure their own governments to align legislation so they can unlock the next phase of market access.

The SAA are less creative in this aspect. Article 74 of the Albanian SAA granted EU companies immediate access to Albanian tenders (asymmetric opening). However, regarding the access of Albanian companies to the EU market, the agreement is vague, stating only that the SAA Council shall "*periodically examine*" the possibility of opening the market. Unlike the AA/DCFTA, there is no automatic roadmap. Therefore, leaving the WB6 companies with no clear legal path to EU procurement markets, removing the domestic incentive for fast alignment.

New frontiers: Convergence in the digital and green markets

While the analysis of four freedoms, competition policy, state aid and public procurement reveals a sharp legal asymmetry between the two regions, this distinction does not hold when analysing the 'new frontiers' of the Single Market. The Digital Single Market and the European Green Deal represent horizontal regulatory regimes that were not fully anticipated by either the SAAs or the AAs/DCFTAs. As such, both frameworks are legally obsolete in these domains. To fulfil this legal vacuum, the EU has increasingly turned to Sectoral Communities - multilateral instruments that bind both regions equally to the EU's evolving regulatory framework, effectively bypassing the limitations of the bilateral treaties.

The most advanced example of this convergence is the energy sector. Neither the SAAs nor the AAs/DCFTAs contain adequate provisions to enforce the European Green Deal decarbonisation targets, such as the introduction of the Carbon Border Adjustment Mechanism or the integration of the renewable energy markets. Instead, gradual integration in this sector is driven almost exclusively by the Energy Community Treaty (ECT). This multilateral treaty acts as a 'sectoral constitution' binding both the WB6 countries and the Associated Trio to the EU energy *acquis*. Through the adoption of the decarbonisation roadmap, the ECT imposes binding obligations on all contracting parties to implement the

EU Emissions Trading System monitoring rules and renewable energy targets.³⁹

A similar convergence is evident in the digital domain. Both the AAs/DCFTAs and SAA predate the Digital Service Act and Digital Markets Act; consequently, neither treaty provides a ready-made legal mechanism for integrating these regions into the modern Digital Single Market.

To bridge this gap, the EU has relied on ‘programme association’. Both WB6 and Associated Trio countries have been granted access to the Digital Europe Programme, allowing them to participate in EU funding for supercomputing, artificial intelligence, and digital skills on equal footing with Member States. Furthermore, the Regional Roaming Agreement, signed by the WB6 countries in 2019 and now being extended to the Associated Trio, demonstrates that functional integration can proceed through ad-hoc regional deals.

Assessment of the single market pathway

The analysis of Pathway I reveals a fundamental structural asymmetry at the heart of the EU’s gradual integration agenda. While the political objective for both WB6 and the Associated Trio is identical - participation in the Single Market prior to membership - the legal frameworks available to achieve this are operating on two fundamentally different logics. The central finding of this section is that the DCFTA functions as a self-executing legal automaton for integration, whereas the SAA functions as a static framework that requires external policy interventions to push forward the gradual integration logic.

This sheds light on a striking historical paradox. For two decades, the WB6 have held official candidate status and a membership opportunity under the legal framework (SAA) that is structurally limited in its capacity to deliver actual market integration. In contrast, the AAs/DCFTAs of Associated Trio,, which were originally designed as an alternative to membership, but with deep integration logic. As a result, the Associated Trio now possesses treaty-based rights to market access that are legally binding and judicially enforceable, whereas WB6 remains more limited in this aspect, despite their long-term engagement in the accession process.

In comparison, the SAAs, although containing provisions that permit deep integration (such as Article 80 on ACAA), lack the mandatory triggers and detailed technical annexes found in the DCFTA to make these provisions operational. Consequently, access to the Single Market for WB6 is a matter of political discretion for the EU Council. Without the legal automaticity of the DCFTA, the SAA framework struggles to convert regulatory alignment into tangible market access, leaving the region in a stabilisation loop rather than a gradual integration trajectory.

The legal divergence leads to a critical policy conclusion: the SAA, in its current form, is technically insufficient to deliver on the idea of gradual integration. While the Associated Trio can integrate simply by implementing their existing treaties, the WB6 require an external policy intervention to bridge the gap between their static agreements and the dynamic reality of the Single Market, as we have seen with the case of the EU Growth Plan for WB6.

39 Emerson, M. & Blockmans, S. (2023) *Sectoral Policy Integration in Advance of Accession - an Alternative or Complement to the Staged Accession Model?*. CEPS.

3.2 Pathway II: Gradual integration to EU institutions and agencies

While the first pathway is the main ‘hardware’ of economic integration - the free movement of goods, services and capital - the second pathway represents the ‘software’ - basically, the political decision-making structures, administrative institutions and technical agencies of the EU. In the context of gradual integration logic, this pathway evaluates how both legal frameworks facilitate the integration of candidate countries in these institutions.

Although important, conducting a comparative analysis between the legal frameworks on this matter is more ambiguous. While both SAA and AA/DCFTAs establish an institutional architecture to manage bilateral relations, their foundational aspects are largely different. Most importantly, in this analysis, it is evident that the overarching association institutions reflect the strict limits of both respective agreements, whereas actual gradual integration of institutions and agencies relies on a parallel and ad-hoc logic.

The formal association institutions

Both agreements establish relevant institutions that facilitate cooperation among the partners, be they councils, committees, and sub-committees. Nonetheless, a closer examination of their mandates reveals the differing integration capacities of these institutions.

The institutional framework of the SAA was explicitly designed as a diplomatic ‘waiting room’ to monitor post-conflict stabilisation and pre-accession reforms. The main body, the Stabilisation and Association Council (SAC)⁴⁰, meets at the ministerial level and functions primarily as a forum for high-level political dialogue rather than active regulatory management. It delegates day-to-day implementation to the Stabilisation Association Committee⁴¹, which is composed of senior civil servants.

Most importantly, the SAA’s dispute settlement mechanism is inherently political and diplomatic. Under Article 119 of the Albania-EU SAA, disputes regarding the application or interpretation of the agreement are submitted to the SAC. The SAC may settle the dispute by means of a binding decision, but this inherently requires mutual political agreement between the EU and the partner country. The agreement does not foresee any independent judicial body to break a deadlock. Consequently, integration disputes are ultimately resolved through political negotiation and diplomatic leverage rather than legal adjudication.

The AA/DCFTA, on the other hand, even in this case, was designed with much more robust institutional mechanisms. Going back to the very reasons why this agreement was prepared in the first place (to deliver deep integration without formal membership), its institutions were granted quasi-legislative capabilities to manage the relationship dynamically. The Association Council⁴² and the dedicated Association Committee in Trade configuration⁴³ hold the explicit power to dynamically update the treaty’s technical annexes⁴⁴ to keep pace with the evolving EU law, ensuring the agreement remains a living document. Furthermore, the Ukraine AA/DCFTA explicitly formalises civil society’s (CSOs) role through the Civil Society Platform⁴⁵, while such an institutional layer is absent in the WB6 SAAs.

40 Art. 116 of Albania-EU SAA

41 Art. 120 of Albania-EU SAA

42 Art. 461 of Ukraine-EU AA/DCFTA

43 Art. 465 of Ukraine-EU AA/DCFTA

44 As per Art. 463 of Ukraine-EU AA/DCFTA

45 Art. 469 of Ukraine-EU AA/DCFTA

The most profound structural difference between the two agreements lies in the dispute settlement level. The AA/DCFTA abandons the purely diplomatic approach, moving in favour of a quasi-judicial framework. If political consultations fail, disputes are submitted to an independent Arbitration Panel.⁴⁶ Even more importantly, Article 322 of Ukraine-EU AA/DCFTA mandates that if a dispute raises a question concerning the interpretation of the EU law, the Arbitration Panel must request a binding ruling from the Court of Justice of the European Union. This mechanism essentially exports EU judicial sovereignty to the associated country, providing a far stronger, right-based institutional link that prevents political deadlocks from stalling technical integration.

Table 3: Comparative institutional set-up

Institutional Feature	AA/DCFTAs	SAAs
Main Political Body	Association Council (Art. 461): Meets at the ministerial level. Focuses on political association and manages the dynamic implementation of the treaty.	Stabilisation and Association Council (Art. 116): Meets at the ministerial level. Focuses on high-level political dialogue and monitoring pre-accession reforms.
Executive/Operational Body	Association Committee (Art. 464) & Trade Configuration (Art. 465): Highly powerful body. The Trade configuration specifically manages the DCFTA and holds quasi-legislative powers.	Stabilisation and Association Committee (Art. 120): Assists the SAC. Prepares meetings and ensures continuity of the association relationship.
Parliamentary Oversight	Parliamentary Association Committee (Art. 467): Composed of Members of the European Parliament and the Parliament of Ukraine.	Stabilisation and Association Parliamentary Committee (Art. 122): Similar composition, providing democratic oversight over the implementation of the agreement.
CSO Engagement	Civil Society Platform (Art. 469): A formal treaty body ensuring civil society organisations can monitor the implementation process and submit recommendations.	Not explicitly institutionalised in the core text: Relies on broader dialogue and non-binding joint consultative committees formed ad hoc.
Dispute Settlement Mechanism	Quasi-Judicial & ECJ-Linked (Art. 306 & 322): If consultations fail, disputes go to an independent Arbitration Panel . If the dispute involves interpreting EU law, the panel	Diplomatic & Political (Art. 119): Disputes are submitted to the SAC. Resolution requires a binding decision based on <i>mutual agreement</i> between the EU and Albania. No independent judicial

46 Chapter 14, Art. 306 of Ukraine-EU AA/DCFTA

	<i>must</i> seek a binding ruling from the Court of Justice of the European Union .	body exists to break deadlocks.
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Leeway for access to EU agencies and programmes

While the formal institutions (councils and committees) manage the bilateral treaties at the macro-political level, the very push for the second pathway of gradual integration lies within the EU's network of technical agencies and regulatory bodies. It is exactly here that the candidate countries transition from policy alignment on paper to operational integration in practice. According to a study carried out by GIZ on accelerated integration opportunities, there are up to 333 distinct avenues for candidate countries to engage across various EU bodies.⁴⁷ However, the analysis of these opportunities reveals that the legal basis for accessing these opportunities is different depending on whether a country is governed by an SAA or an AA/DCFTA.

The legal architecture of the treaties dictates the degree of leverage a candidate country possesses to demand a seat at the table. The SAA provides a weak and generic legal basis for agency access. An examination of Title VII (Cooperation Policies) of the Albania-EU SAA reveals that the text relies almost exclusively on broad cooperation clauses. Provisions typically state that the parties shall establish close cooperation or exchange information in specific sectors, but the treaty does not mandate the partner country's direct participation in the corresponding EU agencies. Because the SAA does not guarantee a legally binding gateway to agency access, any institutional integration for the WB6 countries requires the negotiation of entirely separate, standalone bilateral agreements outside the core SAA framework.

In the case of the AA/DCFTA, integration into EU agencies and programmes is included in the agreement itself. The AA/DCFTA provides a much clearer bridge to institutional inclusion. For example, the Ukraine-EU AA/DCFTA contains specific protocols, such as Protocol III on a Framework Agreement on the general principle for the participation of Ukraine in Union programmes, which legally anticipate and facilitate the partner country's integration into the EU's administrative space as a direct reward for regulatory alignment.

It is worth noting that despite these legal differences, neither treaty grants candidate countries voting rights in EU agencies, as that remains a constitutional privilege reserved strictly for MS. Instead, gradual integration operates on a spectrum of secondary statuses:

- Observer Status - allowing attendance at meetings and access to information without decision-making power.
- Affiliated Member/Associate - represents a more advanced phase of integration, offering deeper operational access and alignment (e.g., WB6 access to the European Environment Agency) but stopping short of voting rights.
- Cooperating on the Basis of an Agreement - the most common integration mechanism where access is governed by bespoke, agency-specific contracts (e.g., Status Agreements with FRONTEX).

⁴⁷ See more: Andrija Pejovic, A. & Radvic, M. (2025) *Study on the Accelerated Integration Opportunities for the Western Balkans*. GIZ.

When examining empirical evidence, it becomes evident that securing these secondary statutes is ultimately driven more by mutual sectoral necessity and geopolitical reality than by the text of the underlying association agreements.

Once again, due to the limitations of the SAA framework in facilitating gradual integration into European structures, the EU is relying on the GP to drive this integration. For instance, the ad-hoc operational inclusion of pushing candidate countries to join the Single European Payments Area (SEPA). While SEIPA is governed by the European Payments Council rather than a traditional EU agency, it functions as a highly integrated, critical pan-European programme. Because the SAA lacks a dynamic, mandatory mechanism to integrate the region into such advanced financial architectures, the GP uses its financial leverage to push the process. Under the GP, countries have foreseen relevant reforms into their domestic legislation aligning with the EU's Payment Services Directive and Anti-money Laundering rules, as one of the preconditions to gain early access to the SEPA membership.

Assessment of the institutional pathway

On paper, the AA/DCFTA offers a higher institutional integration. Its dynamic management committees, explicit textual mandate to integrate into EU agencies, and ECJ-linked quasi-judicial dispute settlement mechanisms provide a highly structured, right-based environment for managing integration. The SAA, by contrast, relies on static political dialogue that lacks the explicit legal mandate to force the doors of EU agencies open. However, regarding the critical goal of actual gradual integration into EU institutions and agencies, the reality is that access is largely ad hoc and disconnected from the associated agreements themselves.

While the AA/DCFTA is the legally stronger treaty, gradual integration in Pathway II is ultimately advanced by a patchwork of bilateral policy decisions and standalone operational agreements. The success of a candidate country in navigating this institutional pathway depends significantly less on whether they hold an SAA or AA/DCFTA, and far more on their administrative capacity to negotiate secondary agreements and the EU's overarching political willingness to integrate them.

3.3 Pathway III: Financial instruments

While Pathway I focused on economic integration, Pathway II focused on institutional architecture, Pathway III represents the critical 'fuel' required to drive the gradual integration process. In the context of the 'reform-for-access' logic, the legal texts of the SAAs and AA/DCFTAs provide the regulatory map, but it is the EU's financial instruments that supply the tangible incentives necessary to compel costly domestic reforms. A comparative analysis of this financial pathway reveals a profound shift in EU methodology. While the overarching bilateral treaties remain static or difficult to amend, the EU has radically redesigned its financial instruments to facilitate gradual integration, transitioning from traditional capacity-building grants to a tiered system of strict, reform-based conditionality.

Financial access in levels

The old generation (Level 1)

Both agreements offer broad cooperation clauses regarding financial assistance, but

historically, both regions relied on standard, external-action functioning instruments. This represents Level 1 of financial access: standard, project-based aid. For the WB6, the primary vehicle has been the Instrument for Pre-accession Assistance (IPA). Governed by the pre-accession logic of the SAA, IPA was primarily designed for basic capacity building, institutional alignment and post-conflict infrastructure development. For the Associated Trio, financial cooperation was initially governed by the European Neighbourhood Instrument (ENI) and later by the NDICI-Global Europe framework.

While essential for basic state building, these old-generation instruments lacked the strict, reform-based lock mechanism necessary to force deep regulatory alignment. Their conditionality was often deemed too broad or too loosely enforced to effectively drive the granular legislative requirements of the Single Market. The financial incentives at Level 1 were insufficiently linked to specific, immediate market access rewards, leading to periods of reform stagnation, as the political cost of implementing complex EU *acquis* frequently outweighed the perceived financial benefits of standard project grants.

This dynamic presents a stark contrast to the early accession of the case of Croatia, which successfully navigated this phase using similar pre-accession instruments. However, it is important to note that the main difference lies in the credibility of the ultimate reward. For Croatia, the imminent and highly credible guarantee of full EU membership provided the overriding political justification required for domestic elites to absorb the painful cost of structural reform. However, the 20 years of enlargement fatigue and delay present in the case of the rest of WB6 countries lead to the lack of incentives for such reforms within the region. Without a credible near-term prospect of formal accession, the short-term political cost of enacting the necessary reforms outweighed the limited financial benefits of standard Level 1. Besides that, the emergence of new actors funding development projects in the region, without the strict conditionalities that the EU uses, has also pushed these countries to look for alternatives with countries like China, Turkey and Gulf Countries.

Intermediate step: Access to EU programmes (Level 2)

To bridge the gap between external aid and full internal market integration, a secondary level of financial access emerged: direct participation in specific EU programmes. As identified in several studies on gradual integration, candidate countries can access thematic, internal EU funding pools by paying financial contributions or ‘entry tickets’.⁴⁸ This Level 2 access bypasses the broad IPA or ENI allocations and allows partner countries to compete directly for funds alongside EU MS.

This level of integration is highly visible in strategic sectors. WB6 and Associated Trio countries already actively participate in the Digital Europe Programme to fund supercomputing and artificial intelligence, Horizon Europe for advanced research and innovation, and the EU4Health programme to modernise healthcare infrastructure. Furthermore, access to instruments like the Connecting Europe Facility (CEF) has become vital for integrating regional transport and energy networks into the Trans-European Networks. This level represents a crucial operational shift from passive aid reception to active, co-financed participation in the EU’s internal policy budgets, although this access is heavily regulated by standalone, programme-specific agreements rather than core SAA or AA/DCFTA texts.

The new generation (Level 3)

⁴⁸ For instance the CERV programme, Erasmus+, Digital Europe, etc.

The most profound evolution in the financial pathway is the introduction of Level 3 access. Recognising the inadequacy of traditional instruments to absorb the massive socioeconomic shocks of deep Single Market integration, the EU deployed transformative, performance-based facilities. These new-generation instruments abandon the project-by-project approach of Level 1 in favour of direct budget support driven by a strict performance-based model. In this new paradigm, the structural conditions and reform milestones are agreed upon ex-ante, but the actual disbursement of funds occurs strictly ex-post - the financial reward is released only after the EC successfully verifies that the required reforms have been implemented.

For the WB6, this paradigm shift is embodied in the EU GP and its accompanying Reform and Growth Facility, which injects additional funds into the region to accelerate socio-economic convergence. Similarly, funding under the Ukraine Facility and the newly established GP for Moldova operate on an identical basis. Under these instruments, partner governments must commit to highly ambitious, bespoke Reform Agendas focusing on several areas (rule of law, digital and green transition and business reforms). Payments are released directly to national treasuries - biannually - only after the EC verifies that the agreed-upon reform steps and quantitative milestones have been fully completed.

Assessment of the financial pathway

The comparative assessment of this pathway reveals that finance serves as the essential tool for gradual integration logic. The evolution from standard, capacity-building aid such as the IPA and ENI to transformative, performance-based facilities like the GPs and the Ukraine Facility demonstrates a radical shift in EU methodology.

What is most striking is that financial conditionality acts as the ultimate equaliser between the different SAA and AA/DCFTA frameworks. Where the SAA lacks the legal mandate and dynamic annexes to facilitate deep market integration, the GP utilises financial leverage to artificially stimulate the AA/DCFTAs reform-for-access logic for the WB6. Ultimately, gradual integration is no longer primarily driven by the static legal text of the association agreements, but by the dynamic conditionality-locked financial instruments and policies.

Conclusion

This study explores a very important question for both the EU and the enlargement countries: do the existing legal frameworks (SAAs and AA/DCFTAs) provide equal and viable pathways for the gradual integration of candidate countries? The analysis demonstrates a profound 'integration paradox' that defines the current situation. The WB6, despite holding a concrete membership perspective for decades, are governed by a legally static, older-generation framework, not well equipped to deliver on gradual integration without other policy interventions. In contrast, the Associated Trio countries, although initially not considered as prospective membership candidates, possess an advanced, dynamic legal framework designed precisely to facilitate the deep sectoral integration that the EC seeks to achieve through the gradual integration approach.

Responding to our core inquiry of how these legal frameworks operate across the three gradual integration pathways, the findings demonstrate that the AA/DCFTA functions as a self-executing legal automaton, whereas the SAA acts as a politically dependent, enabling framework. In Pathway I (Economic integration), the AA/DCFTA grants treaty-based rights to market access through mechanisms like dynamic approximation and mandatory agreements on conformity assessment. The SAA lacks these automatic triggers, leaving the WB market access subject to political negotiations. In Pathway II (Institutional inclusion), the

AA/DCFTA provides explicit legal bridges to the EU agencies and utilises quasi-judicial dispute settlement linked to the European Court of Justice. The SAA, lacking this robust architecture, relegates institutional integration to fragmented ad-hoc working arrangements. Ultimately, it is only within Pathway III (Financial instruments) that the two regions converge. Both legal frameworks are linked to the pre-financing instrument, and the EU has bypassed any limitations, deploying new-generation instruments like the Growth Plan for WB6 and Moldova, and the Ukraine Facility as the primary instruments operationalising and driving gradual integration.

The findings of this study expose important policy implications for both the EU and candidate countries. The most immediate implication is that the SAA, in its current form and without any other policy intervention, cannot drive gradual integration. To prevent the WB6 from falling further behind, the EU must continuously deploy external policy initiatives. The GP is the concrete example of such a policy initiative successfully simulating the missing ‘reform for access’ logic of the AA/DCFTAs. However, it would be a critical flaw to conclude that the financial conditionality alone can permanently resolve the integration setbacks. As the successful accession of previous member states demonstrates, the ultimate driver for deep domestic reforms is not entirely or only tied to financial compensation, but also the imminent and highly credible political guarantee of full EU membership.

However, this dependency on temporary, ad-hoc policies creates a fragile integration architecture highly susceptible to political winds in Brussels. Moreover, it is premature to assume that these new instruments will not encounter the same blockages that stalled previous efforts; money alone cannot automatically resolve the domestic political resistance or bypass the rule of law deficits among the candidate countries.

To address these imbalances, the EU should institutionalise the mechanism of GP into a permanent, legally binding pre-accession instrument, effectively upgrading the operational reality of the SAAs without reopening the complicated process of treaty amendment. Brussels should establish clearer mandatory ‘triggers’ for WB market access, ensuring that verified regulatory alignment through the reforms implemented under the GP is met with immediate, predictable integration rewards, mirroring the legal certainty inherent in the AA/DCFTAs. Yet, these technical upgrades must be coupled with a restoration of overarching political credibility regarding the final accession destination.

Moving forward, the current situation explored in this study opens several important avenues for future research. As the GPs for WB6 and Moldova are moving forward with their implementation, empirical studies will be required to assess whether such instruments successfully overcome domestic political resistance to the rule of law and market reforms. Additionally, a deeper inquiry is needed to evaluate the long-term institutional impact of integrating non-member states into the EU’s evolving regulatory frontiers, particularly the Digital Single Market and the European Green Deal, which remain entirely outside the scope of both legal frameworks.

New membership perspectives in the future of the European Union: enlargement and cohesion policies in the 2028-2034 MFF proposals

by Raffaella Coletti, CNR ISTeG

Introduction

While, in the first chapter of this report, the analysis of enlargement mechanisms has been focused on the comparison between SAA and DFTA, this paper aims to explore the future perspectives of enlargement as emerging from the proposals for the new Multiannual Financial Framework (MFF) published in July 2025 and from the following negotiations among the European Commission, the European Parliament and the Council and public debate on the topic. The aim is to contextualise the enlargement - with the new gradual integration approach and the expansion to the Eastern Trio countries - in the wider future perspectives of the European Union, and the transformations that it is facing.

The MFF is the main instrument for planning the future actions of the European Union. Despite the process of negotiation and approval is still ongoing and not all the aspects of implementation have been defined or clarified, the proposals of July 2025 and the state of the art in the negotiation allow to shed a light on emerging priorities and strategic investments, as well as on how the EU is equipping in the face of present and future challenges.

The chapter will focus on two main topics: enlargement policy and EU cohesion policy. Even if enlargement countries are not included in cohesion policy yet (with the notable exception of the European Territorial Cooperation component), cohesion policy represents a crucial policy in an enlargement perspective for different reasons.

First, cohesion policy represents the main investment policy of the EU aimed at reducing disparities; in case of effective accession, it would be the main European financial instrument for the economic development of the Western Balkan countries and for compensating the consequences of accession to the Single Market. Consequently, the evolution of cohesion policy is of utter importance in the enlargement perspective.

Second, particularly some think tanks in the Balkan region propose an early access to cohesion policy for the enlargement countries¹; discussions are open on different forms of gradual accession². The request for a phased, merit-based access to the cohesion policy fund

1 Zeneli, S. (2025), *L'allargamento dell'Unione europea e la politica di coesione: colmare le distanze*, in Coletti R. e Filippetti A. (a cura di) *Quale futuro per la politica di coesione? Temi e prospettive*. Il Sole 24 Ore. pp. 39-46 https://i2.res.24o.it/pdf2010/Editrice/ILSOLE24ORE/ILSOLE24ORE/Online/_Oggetti_Embedded/Documenti/2025/06/04/Coesione-25-finale.pdf

2 Tuhina, G. (2026), *Letter from Brussels: Is a Hopeful Breeze Blowing Through the EU's 'Waiting Room'?* Balkan Insight, March 12, 2026. <https://balkaninsight.com/2026/03/12/letter-from-brussels-is-a-hopeful-breeze-blowing-through-the-eus-waiting-room/bi/>; Subotic, S. (2024), *Setting the stage for enlargement*, Discussion paper, European Policy Centre – CEP, <https://cep.org.rs/en/publications/setting-the-stage-for-enlargement/>; Mihajlovic, M., Blockmans, S., Subotic, S., Emerson, M. (2023), *Template 2.0 for Staged Accession to the EU*, Open Society Foundations, CEPS, <https://www.ceps.eu/ceps-publications/template-2-0-for-staged-accession-to->

from enlargement countries was also included in the appeal presented by NGOs from Western Balkans after the MFF proposals of July 2025 and further discussed in section 4 of this chapter. Consequently, it is relevant to understand how the new cohesion policy will work, based on the proposals of the European Commission.

Third, preparedness for the management of regional and cohesion policy is not only included as one of the negotiation chapters (chapter 22), but, being mainly managed at the subnational scale, it has been the objective of several projects and know how exchange with Western Balkan countries, including many examples promoted or participated by Italian partners³. A change in the mechanisms and governance, as the one included in the proposals for the next MFF and discussed in section 5 of this chapter, could significantly affect the future.

Finally, most of Western Balkan partner countries are already included in the European Territorial Cooperation component, participating in cross-border and transnational Interreg programmes with Member States. These programs not only offer the opportunity for local communities and stakeholders to cooperate and experiment with innovative solutions, but they also represent an important ground for the management of the funds and for contributing to Europeanization⁴; consequently, it is particularly relevant to take into account the evolution of Interreg programmes in a future perspective.

The chapter is structured as follows. In section 2 a brief framework on the current turbulent times and their impact on the European Union is presented. Section 3 includes a short introduction on the general framework and architecture of the proposed MFF 2028-2034. The chapter will then focus on two main topics: the provisions in terms of enlargement policy and the future of EU cohesion policy respectively. Some conclusions will finally be drawn on what we can expect for enlargement and cohesion policy in the next future.

1. The European Union in a shifting geopolitical landscape

The European Union is going through one of the most challenging periods in its history. The different crises of the last decade – or, the manifestation of a general polycrisis⁵, including

[the-eu/](#)

3 See, for example, Coletti, R., Chiodi, L., Filippetti, A., Marinoni, F. (eds, 2025), *Territorial Cohesion and Place-based Policies in the Western Balkans: an Exchange Programme on Chapter 22 of the EU Acquis*, Cnr Edizioni, https://www.cnr.it/sites/default/files/public/media/attivita/editoria/9788880806950_Territorial%20cohesion_1512_singole.pdf

4 Coletti, R. & Chiodi, L. (2025). *EU Macro-Regional Strategy in the Adriatic and Ionian Region: A Territorial Perspective on the EU Enlargement Policy*. *Journal of Balkan and Near Eastern Studies*, 27(3), 392–411. <https://doi.org/10.1080/19448953.2024.2379667>; Chiodi, L., Coletti, R., Epis, S., Madhi, G. (2025), *Communities of practice in the Adriatic and Ionian region: The untapped contribution to the EU integration of the Balkans*, Osservatorio Balcani Caucaso Transeuropa and CeSPI, https://www.balcanicaucaso.org/cp_publicazione/communities-of-practice-in-the-adriatic-and-ionian-region-the-untapped-contribution-to-the-eu-integration-of-the-balkans/

5 Lawrence, M., Homer-Dixon, T., Janzwood, S., Rockstöm, J., Renn, O., & Donges, J. F. (2024). *Global polycrisis: The causal mechanisms of crisis entanglement*. *Global Sustainability*, 7(e6), 1–16 <https://doi.org/10.1017/sus.2024.1>

geopolitical instability and war, economic crisis, health crisis, environmental crisis - hardly hit on the EU territories, in many different ways. The backsliding of democracy in some EU countries has pushed the EU to search for new instrument to contrast such dynamics⁶, but also increased its ambiguity and mined its credibility on the so called “common values”. The loss of economic competitiveness⁷, in particular with respect to the US and China, has unveiled new challenges, threatening European wealth as well as long-lasting commitment towards convergence and recovery of lagging behind Regions. Crises have manifested in the return of nationalism and border controls, at external⁸ as well as internal EU borders, challenging European territorial integration at different scales⁹. The conflicts and wars raging in the Eastern Neighbourhood and the Middle East are undermining European stability and driving a dramatic resurgence in military spending, with a new war narrative that is diffusing; one that would have been unthinkable just a few years ago.

In this scenario, European institutions and Member States are, on the one hand, trying to preserve the integration process, by protecting some of the results already achieved also by innovating their implementing mechanisms; on the other hand, it is out of doubt that some of the elements that were considered so far as crucial in the EU integration are now under discussion, in the face of emerging priorities and fears. An example of this dynamic is offered by border governance: the continuous suspension of the Schengen agreements is a signal of the difficulties that the EU is facing, with direct effect on one of the symbols of integration; in this framework, the recent approval (in 2024) of a new Schengen Border Code is an attempt to offer a response and to preserve the integration process in an evolving context¹⁰.

In terms of policies, some innovations have emerged in recent years with respect to previous frameworks, including enlargement and cohesion policy, that represent the focus of this chapter.

Enlargement is confirmed as a priority in the EU; in fact, the inclusion of Moldova, Georgia and in particular Ukraine in the enlargement perspectives has increased the attention to the policy. The Russian invasion has accelerated the formalisation of their status as candidate or potential candidate countries, in a context that has changed significantly compared to the past course of enlargement. The policy is indeed now mainly conceived as a response to Russia's

6 Blauburger, M. & Wonka, A. (2025), *Debating EU Actions Against Democratic Backsliding in Hungary: Shifting Government and Opposition Frames*, Journal of Common Market Studies, online first, <https://onlinelibrary.wiley.com/doi/full/10.1111/jcms.13759>

7 See on this the *Draghi Report on EU competitiveness* (2025) https://commission.europa.eu/topics/competitiveness/draghi-report_en

8 Demirci, B. B., Freudlsperger, C., Schimmelfennig, F. (2025): *Geopolitical rebordering? External boundary formation in the European Union*, Journal of European Public Policy, online first, DOI: 10.1080/13501763.2025.2548346

9 Coletti, R. (2024), *Confini e integrazione transfrontaliera nell'UE in tempi di Crisi*. Editoriale CeSPI, <https://www.cespi.it/it/eventi-attualita/editoriale/confini-integrazione-transfrontaliera-nellue-tempi-di-crisi>;
Coletti R. (2025), *Policrisi e governance transfrontaliera: prospettive ai confini italiani*, Federalismi.it, 21, pp. 1-15 <https://www.federalismi.it/nv14/articolo-documento.cfm?Artid=52487>

10 Coletti R. (2025), *Policrisi e governance transfrontaliera: prospettive ai confini italiani*, Federalismi.it, 21,

security threat to the EU¹¹ and is increasingly framed as a geopolitical imperative in a difficult balance with the traditional merit-based approach¹². According to many observers, enlargement is still a relevant testing ground for the wider perspectives of European internal integration. In order to be sustainable, enlargement should also be accompanied by governance innovation, such as, for example, the introduction of qualified majority vote in more policy fields including foreign policy¹³.

The tension between continuity and new priorities, that it is possible to identify in the evolution of the enlargement process, is also affecting European Cohesion Policy, the main investment policy of the EU that occupies around 1/3 of the overall European budget. In this case, on paper, Cohesion policy is still central to the European project; however, the traditional aim of the policy – that is the reduction of disparities and inequalities - is jeopardised by the emergence of new priorities and emergencies: mainly, competitiveness and defence. The will to address those priorities is affecting the policy, as cohesion resources are increasingly used in the framework of the new European industrial policy (for example, to sustain the Strategic Technologies for Europe Platform STEP, as further discussed in section 5) or to support dual-use infrastructure (as we shall see in sections 3 and 5). Overall, these objectives also require a stronger role of Member States with respect to regional authorities, creating the space for recentralization dynamics in a policy that was traditionally considered as the cradle of European multilevel governance. This centralisation, according to many observers, is also influenced by the more centralised experience of Next Generation EU¹⁴.

Overall, enlargement policy and cohesion policy appear both to be still crucial components of the European project. However, the main features of the two policies are changing in the new political and geopolitical context. The new MFF, despite its technical nature, can offer some elements to reflect on this dynamic and on future perspectives, as we shall see in the next pages.

pp. 1-15 <https://www.federalismi.it/nv14/articolo-documento.cfm?Artid=52487>

11 Bonomi, M. & Rusconi, I. (2023), *From EU “enlargement fatigue” to “enlargement enthusiasm”?* OGIE Policy Brief, <https://www.iai.it/en/publications/c09/eu-enlargement-fatigue-enlargement-enthusiasm>; Buras, P. & Morina, E. (2023), *Catch-27: the contradictory thinking about enlargement in the EU*, ECFR, <https://ecfr.eu/publication/catch-27-the-contradictory-thinking-about-enlargement-in-the-eu/>

12 Zeneli, V. (2025), *Geopolitics vs Merit: The EU's Enlargement Dilemma*, Overviews, <https://decode39.com/12776/geopolitics-vs-merit-the-eus-new-enlargement-dilemma/>

13 Jahier, L. (2026), *Europa, allargarsi o compiersi? Un bivio da superare, lo impone la geopolitica!* Editoriale CeSPI, https://www.cespi.it/it/eventi-attualita/editoriale/europa-allargarsi-o-compiersi-un-bivio-da-superare-lo-impone-la?utm_source=newsletter&utm_medium=email

14 Coletti, R. & Filippetti, A. (2025), *Is re-scaling bouncing back? The recentralization of Cohesion Policy in Italy*, Contemporary Italian Politics, online first <https://doi.org/10.1080/23248823.2025.2582443>; Coletti, R. & Filippetti, A. (2026), *PNRR, politica di coesione e governance multilivello: l'esperienza italiana e le prospettive europee*, Italian Papers on Federalism 1/2026, <https://www.ipof.it/pnrr-politica-di-coesione-e-governance-multilivello-l-esperienza-italiana-e-le-prospettive-europee/>

2. MFF 2028-2034 between continuity and emerging priorities

The proposal for the Multiannual Financial Framework for the 2028-2034 programming period was officially launched in July 2025. For the first time, the financial proposal was paralleled by a number of drafted regulations for the different funds and instruments (in previous programming periods, regulations were proposed in a separate phase). A second set of sectoral proposals was presented in September 2025. All the materials are available on a website published in the various EU languages¹⁵.

The proposal reflects the ambiguities and challenges that the EU is facing. On the one hand, the proposal is very ambitious in financial terms: around 2 trillion euros¹⁶, more than the previous programming period (the budget in that case reached 1,8 trillion including 1,07 of MFF 2021-2027 and the post-pandemic instrument of Next Generation EU). By proposing this relevant budget, the EU is sending a clear message of enduring commitment in the European integration process.

At the same time, as we shall see, the new budget is clearly influenced by new emerging needs, in particular defence and competitiveness and more generally the need to face a global instability, that affect the general structure and some of the provisions that are foreseen.

The proposals were anticipated by a preparatory document, "The road to the next multiannual financial framework"¹⁷, published by the European Commission on 11 February 2025. The document outlines a series of strategic challenges for the future. Among those, the first issues mentioned are competitiveness, security and defence, and migration, followed by regional disparities, food security and nature protection, the fight against climate change, the focus on the global political and economic landscape, and the prospects for enlargement. The document seems to suggest a reorientation of priorities, particularly with the emergence of the new hot topics of competitiveness and defence enlisted for first¹⁸. At the same time, the document includes the topics of regional disparities and enlargement among the EU main concerns.

The proposal of the new MFF includes four main headings and 16 programmes for the next programming period. Consequently, the proposal reduces spending headings from 7 to 4, and programs from 52 to 16, with respect to the current programming period, consolidating many programmes in broader envelopes, in an effort of simplification. The four headings correspond to the main sectors of EU intervention, and they are summarized in the following table.

15 The website is available at the following page: https://commission.europa.eu/topics/budget/eu-budget-2028-2034-explained_en

16 €1.8 trillion to finance all planned EU programmes, that arrive to €2 trillion when debt repayments from the pandemic period are included.

17 European Commission (2025), *The road to the multiannual financial framework*, <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/road-next-multiannual-financial-framework>

18 Coletti, R. & Filippetti, A. (eds, 2025), *Quale futuro per la politica di coesione? Temi e prospettive*. Il Sole 24 Ore. https://i2.res.24o.it/pdf2010/Editrice/ILSOLE24ORE/ILSOLE24ORE/Online/_Oggetti_Embedded/Documenti/2025/06/04/Coesione-25-finale.pdf

	I Pillar	II Pillar	III Pillar	IV Pillar
Themes	Economic, Social and Territorial Cohesion, Agriculture, Rural and Maritime Prosperity and Security	Competitiveness, Prosperity and Security (including the innovation fund)	Global Europe	European public administration
Overall resources (in euros)	1062 billion	580 billion	215 billion	117 billion

More specifically, Pillar I includes cohesion policy, agricultural policy, European Territorial Cooperation - Interreg, EU facility – Union actions (including the Solidarity fund and *HOME Thematic facilities*), migration, Frontex ed Europol, and resources for the refund of Next Generation EU loans (168 billion). Pillar II includes the European fund for competitiveness, Innovation Fund, Horizon Europe (with a doubled budget with respect the current programming period), resources for defence and space, Erasmus+, AgoraEU (that will merge previous Creative Europe and Citizens Equality Rights and Values - CERV programmes); Connecting Europe Facility, Single Market Programme; Euratom. Pillar III, Global Europe, includes resources for the Global Europe instrument and the funds for the Common Foreign and Security Policy. Pillar IV, finally, is dedicated to European Public administration. These pillars are complemented by the instrument “Catalyst Europe”, that will offer loans for pursuing European priorities and objectives. A further instrument should be established as a crisis mechanism, with a budget of 400 billions; and 100 billions has been proposed for Ukraine, in support of the reconstruction and the European accession path.

The European Commission indicates the priorities to be addressed by the new proposal in greater flexibility (to ensure the capacity to act and react fast, in light of unexpected circumstances) and simplification of the budget and funding opportunities. Moreover, the Commission confirms the intention to tailor the budget to local needs (a key element in previous programming periods, in particular in the EU cohesion policy), but recalls also the need to boost competitiveness, a crucial imperative for the EU (also based on the recently published Draghi report).

To sustain the budget, beyond the contributions from Member States, the Commission has introduced five new own instruments, that are expected to cover around 20% of the overall MFF:

- *EU Emissions Trading System (ETS)*
- *Carbon border adjustment mechanism*
- *An own resource based on non-collected e-waste* through the application of a uniform rate to the weight of non-collected e-waste.
- *A tobacco excise duty own resource*, based on the application of a rate on the Member State-specific minimum excise duty rate levied on tobacco products.
- *A Corporate Resource for Europe (CORE)*, amounting to an annual lump-sum contribution from companies, other than small and medium-sized companies,

operating and selling in the EU with a net annual turnover of at least EUR 100 million.

Overall, these instruments are expected to generate around 58,5 billion Euro per year.

With respect to the priorities, both competitiveness and defence are confirmed as crucial topics to be addressed. The two are intertwined and are particularly addressed in the framework of Pillar II. In terms of competitiveness, beyond Horizon Europe (that will continue to support European research and innovation), the MFF proposal includes the creation of a “European Competitiveness Fund”, aimed at investing in strategic technologies in four areas: clean transition and decarbonization; digital transition; health, biotech, agriculture and bioeconomy; defence and space. Consequently, defence is included in the efforts for competitiveness, with 131 billion Euros allocated to support investments in defence, security and space, increasing the resources for the same aim in the previous programming period of around five times. Moreover, defence and military expenses are also included in other instruments. For instance, the military mobility strand within the Connecting Europe Facility¹⁹ will be multiplied tenfold, supporting dual-use infrastructure investments alongside civilian ones and contributing to a major boost for cybersecurity, infrastructure, and defence development overall. The Connecting Europe Facility will also provide financing to cross-border energy and transport projects to support energy security.

The new centrality attributed to competitiveness and defence is paralleled by confirmed investments in education and democratic values, also by confirming the mechanism of conditionality, linking access to certain funds to the respect of certain principles or to reform implementation. Also, a focus on the global scale and enlargement on the one hand, and on disparities and cohesion policy on the other hand, are confirmed; but with important innovations (particularly in the latter), that will be further discussed in the next sections.

Overall, the MFF proposal of July 2025 can be defined as in between continuity and emerging priorities. The proposal has officially launched the phase of consultations between EU institutions and Member States, over the overall amount of the budget and, crucially, over its distribution, that will result in the adoption of the budget and regulations. The negotiations are currently ongoing, deeply divided in particular over spending cuts, cohesion funds, and agricultural budgets²⁰. Whereas a coalition of 16 nations (including Italy and Spain) has issued a joint declaration demanding more funding for regional cohesion and agriculture²¹, net-contributor countries (led by the Netherlands, Scandinavian nations, Austria, and Germany) are pushing back against the proposed budget size, arguing the framework is too expensive and that member contributions must be lowered. In this framework, the European Parliament is pushing for an even larger budget, seeking to implement new, independent

19 The Connecting Europe Facility supports the development of high performing, sustainable and efficiently interconnected trans-European networks in the fields of transport, energy and digital services. Further information are available at webpage: https://cinea.ec.europa.eu/programmes/connecting-europe-facility_en

20 For more information <https://www.eunews.it/en/2026/04/24/the-european-council-faces-an-uphill-battle-over-the-budget-meloni-extremely-difficult-negotiations/>

21 For more information <https://www.eunews.it/en/2026/05/26/multiannual-budget-16-countries-including-italy-oppose-the-commission-and-call-for-more-funding-for-cohesion-and-agriculture/>

"own resources" (like e-waste and tobacco taxes) to relieve the burden on national treasuries. Discussions are advancing under the Council, with the goal of reaching a political agreement by the end of 2026 to ensure the legislation is adopted in 2027²²; in the meantime, the proposal with new figures is expected in June 2026.

3. The future of enlargement

3.1 The proposals in the new MFF

In the current MFF proposal, Enlargement policy is included in the Global Europe Pillar²³. This heading is composed of five geographic pillars and a global pillar, each of which includes a programmable and non-programmable component, for emergency challenges; indeed, flexibility emerges as a crucial concern, particularly in external cooperation, in times of evolving geopolitical scenario.

The first geographic pillar is dedicated to Europe, Enlargement and Neighbourhood East and thus includes the resources for enlargement. The resources for this pillar are around 43,2 billion of the overall 200 billion allocation for the Global Europe heading. Moreover, as already mentioned, additional EUR 100 billion are dedicated to Ukraine, to be managed with a high degree of flexibility given the specific conditions of the Country since Russian aggression in 2022.

In the previous programming period, the Western Balkans region was planned to receive about €14 billion in grants through the Instrument for Pre-Accession Assistance (IPA III)²⁴ and additional six billion were made available for the 2024-2027 period from the EU Growth Plan, with the Reform and Growth Facility for the Western Balkans that has increased EU budgetary support for the six Balkan countries by 40%²⁵. While IPA III provides mostly unconditional grants, the GP offers conditional loans, grants, and guarantees tied to reform implementation (as in the case of the Next Generation EU in the European Union territory).

According to Enlargement Commissioner Marta Kos, the new allocation represents a 37% increase compared to the current framework, where 31 billions were devoted to enlargement and eastern countries²⁶. However, it is not clear how much of the 43,2 billion will be dedicated to enlargement countries and specifically to Western Balkans. The European pillar will indeed encompass all current candidate and potential candidate countries— Albania, Bosnia and Herzegovina, Georgia, Iceland, Kosovo, Moldova, Montenegro, North

22 For more information <https://www.consilium.europa.eu/en/policies/eu-long-term-budget/>

23 European Commission (2025), *Proposal for a Regulation of the European Parliament and of the Council establishing Global Europe* COM (2025) 551 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52025PC0551&qid=1753799711782>

24 For further information: https://enlargement.ec.europa.eu/funding-technical-assistance/overview-instrument-pre-accession-assistance_en

25 European Commission (2023), *New Growth Plan for the Western Balkans*, COM (2023), 691 final https://enlargement.ec.europa.eu/2023-communication-new-growth-plan-western-balkans_en

26 See the news at the link: <https://rtsh.al/rti/en/eu-enlargement-budget-grows-by-37-says-commissioner-kos/>

Macedonia, Serbia, Türkiye and Ukraine—as well as the Neighbourhood East partners, Armenia and Azerbaijan, potentially independent civil society organisations and free media in Russia and Belarus and other European countries as Andorra, Liechtenstein, Monaco, Norway, San Marino, Switzerland, the United Kingdom and the Vatican City. Many observers note that it would be advisable to keep at least the same levels of support to the Western Balkans of the current programming period, while an increase in this amount would be an important signal for the enlargement.

Commissioner Kos also stressed the relevance of merit and conditionality in the distribution of the funds, suggesting that reforms will also be sustained by adopting them as pre-conditions for the disbursement of the funds, as in the current Growth Plan²⁷. This kind of mechanism could ensure a stronger alignment of the approach adopted in the enlargement funds with those of cohesion policy (which includes general and sectoral enabling conditions) and in Next generation EU (where investments are linked to reforms).

Considering that the differences in the management of IPA III and cohesion policy limited the possibility for WB countries to acquire competences in the management of European funds, this approximation can be considered promising insofar as it could favour a better preparation of enlargement countries for joining the EU.

According to the EU factsheet²⁸, the resources for enlargement will:

- “support the accession preparations through incentivising reforms and investments via policy-based financing;
- strengthening administrative capacity via targeted technical assistance;
- better respond to and prevent backsliding on the EU accession process, including through a ‘fundamentals first’ approach;
- strengthen alignment between external and internal policies and programmes to pursue EU strategic interests in all dimensions”.

The Regulation on the Global Europe instrument²⁹ will serve the enlargement, neighbourhood, international partnerships and humanitarian aid policies, claiming to maintain the specificities of each policy. Consequently, the proposal of the regulation explicitly builds on NDICI, IPA III, the Reform and Growth Facility for the Western Balkans, Reform and Growth Facility for the Republic of Moldova and the Ukraine Facility.

In this context, enlargement is presented as a “strategic investment in peace, security, stability and prosperity in Europe”; allowing “the Union to be better positioned to address global challenges” and providing “increased economic and trade opportunities to the mutual benefit of the Union and the aspiring Member States”.

27 Zeneli, S. & Smolica, G. (2024), *Navigating the EU conditionality in the New Growth Plan for the WB6*, Discussion Paper, ReAct Lab, <https://www.re-actlab.org/our-work/publications/eu-conditionality>

28 European Commission: Directorate-General for Budget (2025), *Europe’s budget - Enlargement*, Publications Office of the European Union, <https://data.europa.eu/doi/10.2761/4274108>

29 European Commission (2025), *Proposal for a Regulation of the European Parliament and of the Council establishing Global Europe* COM (2025) 551 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52025PC0551&qid=1753799711782>

Moreover, the proposed regulation highlights that “The prospect of Union membership has a powerful transformative effect, embedding positive democratic, political, economic and societal change”, emphasizing the crucial role of reforms in the accession path. A specific article (and consequent resources) is dedicated to Ukraine, considering its peculiar situation.

Overall, the proposal is based on four main principles:

- simplification of the architecture of external heading;
- coherence of action;
- flexibility of the instrument;
- (increasing) impact of EU action³⁰.

The proposal was preceded by the mid-term evaluation of 2021-2027 instruments³¹. For what concerns IPA III, the instrument was considered effective and aligned with the new enlargement methodology (with the fundamentals of the EU accession process at the forefront). IPA III was considered fairly flexible and effective also in promoting socio-economic development and leveraging necessary investments under the Economic and Investment Plan; however, the balance between the performance assessment and the fair share principle had limited the financial reward to well-performing beneficiaries. Overall, the report highlighted the need to further accelerate socio-economic convergence, as well as the alignment with Union values, laws, rules, standards, policies and practices. a

Finally, the proposals for the next MFF acknowledge that enlargements could take place during the 2028-2034 programming period, altering the geographical scope of the policy and, more generally, affecting the overall EU budget (with new Member States that would become eligible for a number of policies, including EU cohesion policy and agricultural policy). Flexibility mechanisms are explicitly introduced to address this scenario. However, despite uncertainty, the most common opinion is that most candidates will not be ready to join the Union during the next MFF, with Montenegro and, eventually, Albania, considered as the most probable exception.

3.2 Public reception and open issues

Even if still in a negotiation phase, the proposals from the European Commission have been criticized in some of their aspects.

The main concern is related to the creation of a single budget line, that put together enlargement funds with resources for other aims and territories. As Federico Baccini puts it³²,

30 For an analysis of the proposals for enlargement, see also Baccini, F. (2025), *Financing Enlargement via the 2028-2034 MFF*, Policy Brief December 2025, FEPS <https://feps-europe.eu/publication/financing-enlargement-via-the-2028-2034-mff/>

31 European Commission (2025 c), *Commission Staff Working Document, Impact Assessment Report accompanying the document Proposal for a Regulation of the European Parliament and of the Council establishing Global Europe*, COM (2025) 552 final <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025SC0552>

32 Baccini, F. (2025), *Financing Enlargement via the 2028-2034 MFF*, Policy Brief December 2025, FEPS <https://feps-europe.eu/publication/financing-enlargement-via-the-2028-2034-mff/>

“Enlargement funds must now compete directly with other pressing priorities, such as humanitarian assistance, development aid, and climate action. Without ringfencing, enlargement allocations may be diluted during negotiations or diverted in response to crises. Global Europe, therefore, provides a stronger framework for coordination but does not in itself guarantee predictable resources for enlargement”.

After the publication of the proposals, in October 2025, an appeal to the European Parliament and to the EU Member States was presented, signed by a coalition of 46 civil society organizations from the Western Balkans, Ukraine, and the Republic of Moldova, urging them to make enlargement a core strategic and budgetary priority in the 2028-2035 programming period³³.

The appeal calls for the creation of a dedicated “Enlargement” budget envelope within the new MFF; proponents suggest that, in its current formulation, the MFF it is not clear about the budget allocated to the advancement in the accession path of candidate and potential candidate countries, and this threatens the achievement of the full membership. Among the provisions requested by the appeal, there is the creation of a dedicated budget envelope for Western Balkans, Republic of Moldova and Ukraine integration, including a “*pre-accession transition*” facility to bridge the gap between negotiations and membership, and, interestingly, a phased, merit-based access to structural and cohesion funds through a dedicated mechanism.

The proposal, moreover, includes the request to ensure that funding scales with performance and reforms, enabling phased and merit-based access to the single market and EU programmes, and ask to maintain an IPA IV with at least €30 billion in grants, merging the effective approaches used in the different instruments available for the 2021-2027 programming period (Ukraine Facility, the WB Reform and Growth Facility and the Moldova Facility).

Other observers question the overall amount of resources reserved for the enlargement in the next programming period, assessing the resources as insufficient for the challenges ahead; however, it will depend mostly on the distribution of the overall “Europe” envelope among the different candidates and potential candidate countries³⁴. In particular, the proposals on the MFF do not address the crucial question of how old (Western Balkans) and new candidate countries (and in particular Ukraine) will be addressed by the enlargement policy.

Moreover, a crucial point remains connected with the preparation of future Member States to manage European funds. Whereas the overall amount of resources is a crucial factor for the preparation for enlargement, the absorption capacity of beneficiaries should also be taken into account, as a crucial component of a well-functioning management of the resources.

33 More information are available here: <https://europe-plus.com/46-civil-society-organisations-call-on-the-eu-to-embed-enlargement-in-the-next/>

34 Baccini, F. (2026), *Allargamento UE, I fondi nel prossimo bilancio sono all'altezza della sfida?*, Osservatorio Balcani e Caucaso Transeuropa, 11/02/2026, https://www.balcanicaucaso.org/cp_article/allargamento-ue-i-fondi-nel-prossimo-bilancio-sono-allaltezza-della-sfida/

Finally, specific studies have been elaborated to be prepared to adapt the budget should enlargements take place during the 2028-2034 programming period³⁵. In this framework, cohesion policy is considered “safe” from important repercussions in case of enlargements, especially in light of the automatic capping rule (which limits cohesion funds to 2.5% of a country's national GDP). The main issue connected to EU cohesion policy would be the reduction of the average GDP, which is used as the main parameter for the distribution of cohesion resources. In this scenario, some European Regions (including Italian ones) would see their quota of European funds reduced³⁶. At the same time, some adjustments to the distribution criteria of resources are always possible, and hypotheses to limit the relevance of GDP are already under discussion

The Common Agricultural Policy is the one that would pose the major challenges. This applies, in particular, in the case of countries like Ukraine³⁷, given its size and the share of agricultural production. At the moment, there is no easy solution to this problem; however, this doesn't appear to be a pressing issue, given the small size of the “frontrunners” Montenegro and Albania that might be able to join the EU during the next programming period.

4. The future of cohesion policy

4.1 The proposals

The proposals published in July 2025 were anticipated by two crucial documents, which introduced the main changes and innovations to be expected³⁸.

The first elements emerged in the already mentioned document “The road to the next Multiannual Financial Framework”³⁹. While confirming the issue of regional disparities as central, the document appears to suggest a reorientation of priorities, particularly with the emergence of new challenges such as competitiveness and defence.

35 Rubio, E., Alcidi, C., Hansum, R., Akhvlediani, T., Begg, I., Lindner, J., Couteau, B. (2025), *Adapting the EU budget to make it fit for the purpose of future enlargements*, Budgetary Support Unit, DG Budgetary Affairs, [https://www.europarl.europa.eu/thinktank/en/document/BUDG_STU\(2025\)769193](https://www.europarl.europa.eu/thinktank/en/document/BUDG_STU(2025)769193)

36 Darvas, Z., Mejino-López, J. (2024), *What enlargement could imply for the European Union's budget*, Bruegel, <https://www.bruegel.org/analysis/what-enlargement-could-imply-european-unions-budget>

37 Baccini, F. (2026), *Allargamento UE, I fondi nel prossimo bilancio sono all'altezza della sfida?*, Osservatorio Balcani e Caucaso Transeuropa, 11/02/2026, https://www.balcanicaucaso.org/cp_article/allargamento-ue-i-fondi-nel-prossimo-bilancio-sono-allaltezza-della-sfida/; Rubio E. (2024), *EU enlargement and the post-2027 Multi-Annual Financial Framework*, Briefing Requested by the BUDG Committee, European Parliament, [https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/766224/IPOL_BRI\(2024\)766224_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/766224/IPOL_BRI(2024)766224_EN.pdf);

38 Coletti, R. & Filippetti, A. (eds, 2025), *Quale futuro per la politica di coesione? Temi e prospettive*. Il Sole 24 Ore. https://i2.res.24o.it/pdf2010/Editrice/ILSOLE24ORE/ILSOLE24ORE/Online/_Oggetti_Embedded/Documenti/2025/06/04/Coesione-25-finale.pdf

39 European Commission (2025), *The road to the multiannual financial framework*, <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/road-next-multiannual-financial-framework>

A few months later, on 1 April 2025, the mid-term review of cohesion policy was published, aimed at realigning the policy strategy with the new socio-economic context. The review emphasised the evolution of the context and proposes the possibility, on a voluntary basis, of re-orienting funds towards emerging priorities already in the current programming period. More specifically, the Commission requested that the share of funds to be allocated to the Strategic Technologies for Europe Platform (STEP) be further increased compared to what has already been planned. The STEP, based on recommendations from the Draghi Report, is an initiative designed to strengthen the EU's ability to create and ramp up strategic technologies, making it more competitive globally, supporting sectors like artificial intelligence, cybersecurity, and clean energy. The STEP cannot count on additional resources and should be funded within existing instruments⁴⁰.

In the mid-term review, the Commission also proposed extending the use of cohesion policy funds to support large enterprises in the case of investments in decarbonisation or common defence, so that they can contribute more to the new European industrial policy. The review also refers to the other emerging pillar of the European agenda, that is to say defence, with the Commission calling for a more effective use of funds and proposing that Member States reallocate part of their resources to projects supporting businesses (regardless of size) in the defence sector, or contribute to the construction of dual-use infrastructure to improve the mobility of armed forces in the EU.

The mid-term review also adds a 'social' component, proposing to reprogramme funds towards social housing, decarbonisation and funds for urban centres; it is worth noting that, although these issues are surely crucial for European territories, they are not specific to “lagging behind” Regions; as such, they do not specifically contribute to the “cohesion” objective.

The new MFF proposal introduces important changes in the architecture of the EU cohesion policy. First of all, similarly to enlargement, cohesion policy cannot count on a specific budget heading but is included in the same heading as agricultural policy, under Pillar I. What emerges is the consolidation of various funds (including those dedicated to the Common Agricultural Policy) into a single pool, along with greater flexibility to respond to potential emergencies and unexpected events.

Cohesion and agricultural policy will be planned within a new defined instrument, that of the National and Regional Partnership Plans, that will replace the current model of Cohesion Policy, where each European region has its own programming document (approved by the European Commission) and own resources, in the framework of the priorities of EU cohesion policy and of the partnership agreement between the Commission and each Member State.

National and Regional Partnership Plans will replace a number of policies; as such, their implementation will be based on different regulations; the proposals are available in the already mentioned EU budget website⁴¹.

40 For more information: https://strategic-technologies.europa.eu/index_en

41 Specifically, the proposals on National and Regional Partnership plans will be based on regulations on: Common Agricultural Policy; Common Fisheries Policy, European Ocean Pact and the Union's maritime and

According to the factsheets published together with the MFF proposals⁴², the new strategy will have “economic, social and territorial cohesion, agricultural and fisheries policies and security at its core”. The Plans aim to “foster convergence and reduce regional disparities, support a resilient, competitive and sustainable EU agricultural and fisheries sectors, invest in people and deliver on the European Pillar of Social rights, bolster security and protect our borders”.

The Commission will establish a mandatory minimum amount for less developed Regions (based on the amount of the current programming period) and a minimum target for social objectives. Moreover, it confirms that support for farmers’ income and for the fisheries policy will be preserved. The Commission, moreover, proposes to introduce an EU Facility to support Member States and Regions in case of crisis and unexpected circumstances, as well as to support Union actions in specific fields (including, for example, urban initiatives and social innovation)

The new model of National and Regional Partnership Plans pursues the simplification of the EU budget and the efficient use of available resources; it is also very much influenced by the experience of the Next-Generation EU, which determined a centralisation in the hands of the Member States of decision-making and management of European funds⁴³. Moreover, the proposals reflect the experience of the Next Gen EU in a number of other ways: they introduce a more results-oriented evaluation and a stronger link between investments and reforms.

Whereas previous programming periods included a strong orientation on specific priorities (concentration being one of the key principles of EU cohesion policy) and a distribution among EU Regions based on horizontal EU criteria, in the current model much higher degree of liberty is left to the Member States in terms of priorities, allocations, and governance models.

The central role of the Member States appears to be functional to the new priorities of the EU in the near future, namely the already mentioned competitiveness and defence, which, by their very nature, require a stronger centralised coordination. Regarding defence, moreover, it is worth mentioning that Member States and Regions can support, on a voluntary basis, defence-related projects, in the framework of their National and Regional Partnership Plans.

aquaculture policy; European fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security; European fund for Regional development and cohesion fund; European social fund; School fruit, vegetables and milk scheme (“EU school scheme”); Union support for asylum, migration and integration; Union support for internal security; Union support for the Schengen area, for European integrated border management, and for the common policy on visa.

42 European Commission: Directorate-General for Budget (2025), *Europe’s budget – National and regional partnership plans*, Publications Office of the European Union, <https://data.europa.eu/doi/10.2761/9109969>

43 Kölling, M. & Hernández-Moreno, J. (2023), *The Multiannual Financial Framework 2021-2027 and Next Generation EU—a Turning Point of EU Multi-Level Governance?* Journal of Contemporary European Studies, 32 (2), pp. 459–473; Coletti, R. & Filippetti, A. (2026), *PNRR, politica di coesione e governance multilivello: l’esperienza italiana e le prospettive europee*, Italian Papers on Federalism 1/2026, <https://www.ipof.it/pnrr-politica-di-coesione-e-governance-multilivello-l-esperienza-italiana-e-le-prospettive-europee/>

4.2 The future of Interreg

Based on the negotiations on the future of Interreg⁴⁴, European Territorial Cooperation appears to be preserved from the important innovation foreseen for the rest of EU cohesion policy. Interreg programmes will indeed be decoupled from the above mentioned National and Regional Partnership Plans, and the European Commission has proposed a budget of around €10 billion for Interreg (slightly bigger than the 2021–2027 period).

The main novelty of the proposed regulation is that it provides for a single “Interreg Plan” instead of formally single programmes; the Plan will serve as a framework for all forms of European territorial cooperation—cross-border, transnational, interregional, and cooperation involving the outermost region.

However, the Interreg Plan will be organised into geographical chapters, each corresponding to a defined cooperation area with specific objectives, strategies, and governance, maintaining the current structure. Moreover, the Commission advocates for the geographical continuity of programs and management structures as well as the co-financing rate.

Consequently, existing programmes have started the programming activities for the future 2028-2034 period. Most of the programmes have activated public consultation processes, including online questionnaires for stakeholders and beneficiaries.

Based on the proposed regulation, in the case of Interreg programmes covering Member and non-Member States (as in the case of enlargement countries), the Global Europe Instrument will contribute to the programmes (in continuity with what happens in the current programming period with IPA III and NDICI).

Interreg will continue to offer a relevant source of experimentation for cross-border initiatives and for approximating the management of cohesion resources. Moreover, Interreg offers an important – yet not unique – source of funding for the European Macroregional Strategies, including, in the case of the Western Balkans, the European Strategy for the Adriatic and Ionian Region⁴⁵.

4.3 Public reception and open issues

The proposals for the next programming period of European cohesion policy and agricultural policy, with the proposed National and Regional Partnership Plans, have drawn widespread criticism from various stakeholders.

44 European Commission (2025), *Proposal for a Regulation of the European Parliament and of the Council establishing the European Fund for Regional Development including for European Territorial Cooperation (Interreg) and the Cohesion Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to regional development from 2028 to 2034*, COM (2025) 552 final, <https://eur-lex.europa.eu/legal-content/IT/TXT/?uri=CELEX:52025PC0552>

45 Coletti, R. & Chiodi, L. (2025). *EU Macro-Regional Strategy in the Adriatic and Ionian Region: A Territorial Perspective on the EU Enlargement Policy*. *Journal of Balkan and Near Eastern Studies*, 27(3), 392–411. <https://doi.org/10.1080/19448953.2024.2379667>

Above all, the European Committee of the Regions has from the outset openly opposed the new model proposed by the Commission, emphasising that the new National and Regional Partnership Plans, with the consolidation of various funds and the central role assigned to Member States, risk, on the one hand, creating competition among Regions, local authorities, and other stakeholders for access to available resources; on the other hand, to marginalise the role of Regions and cities in the planning and implementation of cohesion policies⁴⁶. The European Parliament has also levelled a great deal of criticism⁴⁷.

Other voices, particularly in the Italian context, nevertheless point out that the greater leeway granted to Member States may not translate into actual centralisation, since, in practice, an implementation model very similar to the current one could be adopted⁴⁸. However, there is no doubt that the proposals grant Member States greater discretion in this area.

Other criticisms of the proposal concern the issue of flexibility, which, while responding to the unpredictable demands of a constantly changing world, risks undermining the long-term outcomes of investments, as well as the emphasis on new emerging priorities, such as competitiveness and defence. Although the documents tend to present investments in these areas as potential drivers of development even for marginal Regions, the risk is that those Regions already best prepared to meet new challenges will be further advantaged, thereby increasing rather than reducing regional disparities.

Finally, a more general criticism concerns the very influence that the NEXT Generation EU model has had on the new formulation of cohesion policies: a model that was created to address different objectives (recovery and resilience, not economic, social, and territorial cohesion), is characterised by a clearly top-down structure, and whose effectiveness has not yet been adequately assessed.

In line with what discussed so far, a recent study on "Navigating the European Commission's MFF Proposal for 2028-2034"⁴⁹ identifies several problems with the National and Regional Partnership Plans, including the following: (i) The Proposal is not underpinned by a clearly articulated intervention logic for promoting cohesion, assuming that ringfencing resources to less developed Regions and ensuring a balanced territorial distribution will automatically support cohesion; (ii) In the proposal, the role of regional and local authorities in planning

46 The President of the Committee of the Region, Kata Tüttö, famously declared that the new model would force and "hunger games" competition for resources in the next programming period:

<https://www.cor.europa.eu/en/news/state-regions-and-cities-strong-and-decentralised-cohesion-policy-key-europes-resilience-and>. See also the recent opinion on the MFF adopted unanimously by the Committee: <https://www.cor.europa.eu/en/news/future-eu-budget-regions-and-cities-set-out-their-key-requests-reform-cohesion-policy>

47 See <https://www.akeuropa.eu/en/multiannual-financial-framework-2028-2034-eu-parliament-calls-higher-budget-and-greater>

48 See for example <https://lavoce.info/archives/108504/che-fine-fanno-le-politiche-di-coesione-nel-nuovo-bilancio-ue/> as well as the speech delivered by Commissioner Fitto at the European Parliament after the publication of the proposals https://ec.europa.eu/commission/presscorner/detail/en/speech_25_1873

49 Rubio, E. & Alcidí, C. (2026), *Navigating the European Commission's MFF Proposal for 2028-2034: Mapping Risks and Opportunities for Cohesion Policy and Regional Development*, Research for REGI Committee [https://www.europarl.europa.eu/thinktank/it/document/CASP_ATA\(2026\)783503](https://www.europarl.europa.eu/thinktank/it/document/CASP_ATA(2026)783503)

and implementation is left largely to each Member State, which may decide whether to include territorial chapters. This points to a more centralised governance model with respect to the current one; (iii) The move towards more integrated programming offers opportunities to reduce overlaps between Common Agricultural Policy and Cohesion Policy, but it risks intensifying budgetary competition between the two; (iv) There is a fundamental tension between the European Competitiveness Fund and the National and Regional Partnership Plans: the first supports competitiveness by exploiting scale economies, while the second namely supports a territorially balanced development promoting convergence.

The report, at the same time, suggests some possible remedies. Some of the most relevant are the following:

- introduce mandatory territorial impact assessments (TIAs). The scope of those instruments is to acknowledge and assess the territorial dimension of interventions. If the TIA identifies important negative territorial consequences of certain interventions under National and Regional partnership Plans, Member States should justify the high net benefit of these interventions or should explain how they intend to mitigate these effects through complementary national policies;
- introduce a “regional check”, to verify the respect for the subsidiarity principle and the legal division of competences;
- clarify and protect the “right to stay”, or the protection and development of marginal territories;
- introduce region-specific milestones and targets for areas of exclusive regional competence;
- ensure that allocations for less developed Regions support cohesion-related interventions;
- support integrated local development strategies in rural areas;
- preserve and reinforce place-based innovation instruments, including interregional innovative investment projects and Smart Specialisation Strategies.

These elements should be taken into account in the negotiation phase of the proposals.

Moreover, as negotiations continue, additional information emerges. A recent study produced by the European Parliament and analysed by *Il Sole 24 Ore*⁵⁰ paints a very worrying picture of the future of resources, with funding allocated to Member States in the next MFF that is expected to fall by an average of 8%, from €759 billion to €698 billion at constant prices. In absolute terms, Italy and Spain will be the most penalised countries. The problem is particularly evident in the framework of cohesion policy. Even in the best-case scenario (where all Member States allocate their entire flexible share to cohesion), regional policies would receive the same amount as in the current budget: €364 billion compared to €362 billion. In the opposite scenario, the cohesion budget would be almost halved, to €194 billion. The same applies to social policies, which in the 2021–27 budget are allocated to the

50 Chiellino, G. (2026), *Bilancio Ue: in arrivo tagli drastici per coesione e spesa sociale*, *Il Sole 24 Ore*, 31 marzo 2026, <https://www.ilsole24ore.com/art/bilancio-ue-arrivo-tagli-drastici-coesione-e-spesa-sociale-AInM9qFC>

European Social Fund Plus with a budget of almost €96 billion, whereas in the next budget they will not have a dedicated fund but a ‘horizontal’ spending target ranging from a minimum of €31.8 billion to a maximum of €55.5 billion: 42% less in the best-case scenario. At the same time, cohesion policy is increasingly perceived as an instrument to tackle territorial fragilities in times of emergencies, rather than a policy with a long term view for economic, social and territorial convergence. This results, for example, from the letter that Commissioner Raffaele Fitto sent in May 2026 to European ministers and regions, suggesting to use cohesion resources to tackle the high cost of energy⁵¹.

Moreover, rumours have begun to circulate about a possible reorganisation of the European Commission, involving the abolition of DG REGIO, which plays a central role and acts as a key interlocutor at various levels (including at sub-national level) in the implementation of cohesion policy⁵². At the same time, a public letter was published by a group of 26 countries (the Friends of Cohesion), including Italy and Spain, asking to preserve the resources for cohesion policy, common agricultural policy and common fisheries policy in the next programming period⁵³.

Conclusions

The analysis presented in this chapter offers some preliminary elements on the future of the European Union budget, with a specific focus on enlargement policy and European cohesion policy.

Even if negotiations are still in place at the time of writing, and some of the provisions that have been discussed in the previous pages might ultimately change, the proposals from the European Commission offer an overview of the general EU strategy for the next programming period.

New pressing needs – above all, competitiveness and defence – have contributed to a reconfiguration of the European Union and its policies. The objective of enlargement is mainly framed in terms of geopolitical imperative, as functional to European security; the objective of cohesion has, to some extent, been subsumed under that of regional competitiveness, in a fusion of two objectives that are not always consistent or compatible. Furthermore, cohesion funding is at risk of being significantly reduced.

The new model foreseen in the National and Regional Partnership Plans marks a milestone in a gradual process of recentralization of EU cohesion policy that has been ongoing for several programming periods⁵⁴. The recentralization is particularly relevant not only in terms of

51 See <https://www.ilsole24ore.com/art/caro-energia-fitto-manda-lettera-regioni-ue-dirottare-fondi-coesione-AIpk2fPD>

52 See: <https://www.eunews.it/en/2026/05/13/eu-mulls-reform-of-the-directorate-general-for-regional-policy-with-fittos-backing/>

53 The letter is available here <https://vm.ce/en/news/joint-declaration-multiannual-financial-framework-2028-2034-friends-cohesion>

54 Molica, F., de Renzis, S., Bourdin, S. (2024), *Between Re-Renationalisation and Hyper-Lisbonisation: The*

governance (where each Member States have traditionally adopted its own model), but mainly in terms of decision making, in the distribution of resources across territories and priorities. The centralisation appears to be functional to the abovementioned new objectives of competitiveness and defence, whereas a central responsibility is more suitable for the management of investments in those areas. At the same time, the model is clearly and extensively based on the experience of Next Generation EU, where the pressing deadlines for using the resources pushed for a more centralised and top-down model compared to the cohesion policy.

The clearer performance orientation of both cohesion policy and enlargement policy for the future suggests possible greater similarities in the management of the funds, which would help enlargement countries to get prepared for the management of European resources. At the same time, it is very important for enlargement countries that cohesion policy maintains its crucial ambition to reduce disparities across the European territory, in order for them to take full advantage of European integration. From this point of view, even if enlargement and cohesion policy represent separate domains, each with its own logic, the two are intertwined in many different ways.

Indeed, both policies were included in the motion proposed in February 2026 for a European Parliament resolution on EU enlargement policy⁵⁵.

Among other things, the document clearly combines the merit-based nature of the enlargement process with new geopolitical imperatives. It emphasises the support for enlargement from 56% of European citizens according to the recent Eurobarometer, as well as the understanding of enlargement as a “key driver of long-term security, peace, stability and prosperity in Europe, based on shared democratic values” and the “merit-based” nature of the process. In parallel, it also recalls recent instability following Russia’s aggression of Ukraine, including the “dangerous” expansion of China’s influence, and frames enlargement as a “strategic response to the new geopolitical reality and an investment of the utmost importance for the EU’s security and stability” (1). The document “reiterates that accession must remain a merit-based and reversible process” and underscores that “there can be no shortcuts on EU values and fundamental principles” (8). Moreover, it highlights the importance for candidate countries to align with the CFSP.

At the same time, the document recalls the need to ensure “an effective functioning of an enlarged Union”, by preparing for the enlargement within and outside the EU (30), intervening on political mechanisms such as the Qualifying majority Vote, but also by safeguarding for an enlarged EU cohesion policy and the common agricultural policy, “that play a central role in promoting convergence among EU Member States” (35). The document also calls for an application of gradual integration (36).

These contributions to the debate undoubtedly provide valuable insights for the finalisation of the MFF, which will be adopted at the end of the negotiation phase – a process that is proving

Long Goodbye to the EU Cohesion Policy Original Goals. Regional Studies, 59 (1), <https://doi.org/10.1080/00343404.2025.2540361>

55 https://www.eurparl.europa.eu/doceo/document/A-10-2026-0016_EN.pdf

complex and whose outcome remains largely unpredictable at this stage.

Civil society engagement in the EU association agreements and new Growth Plans

by Gentiola Madhi, OBCT

Introduction

EU enlargement policy regained momentum in the wake of Russia's full-scale invasion of Ukraine in 2022. The change of the geopolitical circumstances, the security challenges and the evolving priorities at EU level marked a departure from more than a decade of navigating in uncharted waters and disillusionment, generating fresh dynamics and expectations for some of the Western Balkans' in their pursuit of membership.

Once the three Eastern Neighbourhood countries - Ukraine, Moldova and Georgia (the Associated Trio) - which, over the previous two decades, had developed with the EU an integration model based on the principle of 'all but the institutions' were offered the candidate status due to the emerging security concerns, the European Commission had to change approach to the WB too.

Bosnia and Herzegovina, meanwhile, was given the green light to open accession negotiations. Montenegro made notable progress, provisionally closing 14 negotiating chapters, while Albania closed three. Only Kosovo remained behind in its EU integration process, holding still the potential candidate status.¹

In addition, the European Council marked an additional step forward by launching gradual integration as a leading political approach to the accession process. Although its practical implications are yet to be fully defined, gradual integration enables enlargement countries to progressively participate in selected EU policies and programmes and gain access to parts of the Single Market, conditional upon the fulfilment of specific reform benchmarks. Gradual integration is neither linked to nor does it have an impact on the formal accession negotiations between the candidate countries and the EU.²

In Commission's perspective gradual integration would provide for a series of benefits to the candidate countries during the pre-accession period, accelerating the pace of alignment with EU *acquis*, which would result in a speeding up of the negotiations, besides the positive effects on economic growth.³

Early this year, as part of a personal initiative, Albanian Prime Minister Edi Rama and Serbian President Aleksandar Vucic proposed harvesting the potential of gradual integration by bringing their countries into the EU Single Market and Schengen Area, without placing

1 Whereas Georgia was granted candidate status upon condition of implementing a series of reforms.

2 Buras, P., et al. (2025), *Gradual Integration: Bringing Aspiring Members Closer to the EU*. Think Tank Europa and European Council on Foreign Relations. ECFR. Think Tank Europa.

3 Follow-up from the Commission INT/1058, to the European Economic and Social Committee, Potential challenges for the European single market arising from the future enlargement of the Union, available at: <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/potential-challenges-european-single-market-arising-future-enlargement-union#downloads>

additional strain on the Union's decision-making architecture or institutional balance.⁴ This move was perceived as shifting away from the traditional accession process and cherry picking some benefits from the closer relationship with the EU.

Several civil society organisations argued that gradual integration cannot serve as a substitute for the EU enlargement process, which is deemed as “a long-term process of state and social transformation”.⁵ If the Rama-Vucic proposal was deemed an interesting avenue for the EU, the gradual integration of candidate countries in the aforementioned policy areas would risk slowing the pace of reforms in other areas, particularly those covered by the fundamentals cluster.⁶ Instead, according to these same civil society organisations gradual integration should be understood within a broader framework, extending beyond technical alignment with the *acquis*, to prioritise above all the strengthening of democracy and the rule of law.⁷

To restore enthusiasm in the candidate countries and cope with the challenging economic performance, the Commission introduced a new political initiative at the end of 2023, called the Growth Plan for the Western Balkans, along with its dedicated financial instrument, the Reform and Growth Facility (RGF). It aims to stimulate reforms and enhance economic convergence in the WB6 countries, allowing them to reap the benefits of gradual integration prior to full membership. The financial envelope is composed of grants and loans at favourable rates, which top up to the existing IPA III mechanism. The Growth Plan is a performance-based instrument, whereby the disbursement of funds is contingent upon the delivery of pre-agreed reforms by the government concerned until the end of 2027. Drawing on the WB6 experience, the Commission adopted, a few months later, the Growth Plan for Moldova and the Ukraine Facility. The Growth Plan allocation had the potential to significantly accelerate economic convergence in the Western Balkans, with the prospect of doubling the size of the region's economies over the next decade.

Besides the recent technical measures adopted and political upsides offered by the EU institutions to candidate countries, civil society plays an essential role at the national level, consistently scrutinising, advocating for and driving forward EU-related reforms. CSOs also have engaged in forging relationships and building transnational networks in order to channel the respective national concerns and view points directly to Bruxelles, contributing to the wider enlargement debate. The experience of the Western Balkans shows that CSOs have always been a relevant actor in the EU accession process.⁸

4 Edi Rama E., Vučić A., (2026), *Das wäre ein realistischer Weg in die EU*. Frankfurter Allgemeine Zeitung, available at: <https://www.faz.net/aktuell/politik/ausland/serbien-und-albanien-ein-realistischer-weg-in-die-eu-accg-110845507.html>

5 European Western Balkans, (2026), *Gradual integration should not be a substitute for full EU membership*, available at: <https://europeanwesternbalkans.com/2026/09/10/gradual-integration-should-not-be-a-substitute-for-full-eu-membership/>

6 Mattinale Europeo, (2026), *Nella sala d'attesa dell'Ue si sta troppo comodi*, available at: https://substack.com/inbox/post/215533298?utm_source=email&redirect=app-store-no-desktop&inbox=true&utm_campaign=email-read-in-app&triedRedirect=true

7 EUCRTA, (2026), *New dynamism in the EU enlargement debate: implications for democratic governance and rule of law conditionality*. Policy Brief, available at: <https://eucrta.eu/wp-content/uploads/2026/09/EUCRTA-enlargement-non-papers-analysis.pdf>

8 Miljenović, R., (2024), *The potential of the Growth Plan for the Western Balkans-Recommendations for its implementation and the role of civil society*. Civil Society Forum Tirana, available at: https://epi.org.mk/wp-content/uploads/The-Potential-of-the-Growth-Plan-for-the-Western-Balkans_Recommendations-for-Its-Implementation-and-the-Role-of-Civil-Society.pdf

The national institutional mechanisms established to facilitate CSOs participation in the EU accession negotiations have often been shaped by political decisions. At the EU level, the legal frameworks governing the relations between the EU and the enlargement countries have adopted different approaches to the formal inclusion of CSOs.

As this analysis shows, the Stabilisation and Association Agreements lack specific provisions dedicated to the CSOs' engagement in the Western Balkans, whereas the Association Agreements, including Deep and Comprehensive Free Trade Areas, provide for specific consultation mechanisms with civil society in the Trio countries. Meanwhile, the recently introduced Growth Plans seek to partially address such gaps by explicitly recognising the importance of CSOs' consultation, while leaving to the member states the relative consultation modalities. Ultimately, the Growth Plans remain temporary political instruments that complement, rather than replace, the Association Agreements governing the enlargement process for the WB.

Against the backdrop of these recent developments, this policy analysis aims to examine the extent to which the civil society organizations are formally recognized as actors within the legal framework governing the relations between the EU and candidate countries. It further explores the CSOs engagement in the newly introduced political initiatives and their attempts to advocate for more leverage at the EU level.

The analysis is structured around three key dimensions of civil society engagement. The first assesses the extent to which cooperation with civil society has been institutionalized within the legal frameworks governing EU relations with the enlargement countries. The second examines the CSOs participation in reform agenda shaping and monitoring under the Growth Plan. The third dimension examines how CSOs use transnational networks and advocacy to secure a stronger role at EU level in the MFF 2028-2034, as the space for civil society at national level shrinks. Overall, although the EU now recognises civil society as a key partner in the enlargement process, this recognition will remain largely symbolic unless it is anchored in institutionalised consultation mechanisms and dedicated, predictable funding that make civil society an effective actor in shaping and monitoring accession-related reforms.

1. Civil society role in the association agreements with the EU

The concept of civil society remains broad and heterogeneous, a continuously growing phenomenon that encompasses a diverse range of actors performing multiple and often complementary roles. In a broader perspective, this analysis relies on the EU's understanding of civil society organisations, which include non-profit and independent entities, non-governmental organisations, think tanks, research institutes, universities, organisations representing economic and social interests, professional associations, networks, not-for-profit media and independent foundations, etc.⁹

The formal recognition of the role of civil society in the accession process dates back to the Enlargement strategy and main challenges 2006–2007, where the Commission declared the establishment of the first policy dialogue with civil society organizations based in candidate

⁹ European Commission, (2022), *DG NEAR Guidelines for EU support to civil society in the enlargement region 2021-2027*, available at: https://enlargement.ec.europa.eu/dg-near-guidelines-eu-support-civil-society-enlargement-region-2021-2027_en

and potential candidate countries in the Western Balkans.¹⁰ It was followed by the establishment in 2008 of the Civil Society Facility, which recognized civil society development as a key priority for EU enlargement and aimed to provide capacity building and technical assistance to CSOs in the WB6 countries.¹¹

The Commission has consistently called on the WB6 to establish inclusive structured dialogues with civil society on EU reform priorities and for the empowerment of civil society.¹² This commitment is also reflected in the revised enlargement methodology, which emphasizes that EU-related reforms should be pursued in a transparent and inclusive manner, with the meaningful CSOs' involvement.¹³ It further recognizes the importance of fostering an enabling environment in which civil society can exercise a stronger and more meaningful role in the reform process.

The Union has also supported the civil society organizations' consultation in the Eastern Neighbourhood countries, through the establishment of institutional mechanisms that facilitate their participation, strengthen structured dialogue, and foster regular exchanges between societal actors and public authorities.¹⁴

Nevertheless, from a comparative perspective, the EU has followed a differentiated approach towards the formalization of the CSOs' role and contribution in the legal framework governing its relations with the WB6 countries vis-à-vis the one with the Eastern Trio countries. As Zeneli and Smolica show in chapter 1, both the SAAs and the AA/DCFTAs can be considered as "comparable in terms of scope [but] differ in their design."¹⁵ A key distinction lies in the respective foundational aspects and in the bilateral institutional mechanisms established under each set of agreements.¹⁶

10 European Commission, (2006), *Communication from the Commission to the European Parliament and the Council. Enlargement Strategy and Main Challenges 2006 – 2007. Including an annexed special report on the EU's capacity to integrate new members*, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52006DC0649>

11 Wunsch, N., (2018), *EU Enlargement and Civil Society in the Western Balkans*, Palgrave-MacMillan. pp. 25-26, 29-30.

12 European Commission, (2018), *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. A credible enlargement perspective for and enhanced EU engagement with the Western Balkans*, available at: https://eur-lex.europa.eu/resource.html?uri=cellar:d284b8de-0c15-11e8-966a-01aa75ed71a1.0001.02/DOC_1&format=PDF

13 European Commission, (2025), *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. EU Strategy for Civil Society*, available at: https://commission.europa.eu/document/download/8c30975d-bc1c-4415-8dcd-a71cb28f3662_en?filename=JUST_template_comingsoon_standard.pdf

14 Góra, M. & M. Zubeck, (2021), *Stuck in ENP purgatory? An assessment of the EU's external legitimacy mechanisms*, EU3D Research Papers No. 12, Oslo: ARENA, cited in Anagnostou, D., (2022), *Countering dominance, enhancing legitimacy? The role of civil society in EU accession in Serbia and the Western Balkans*, EU3D Research Papers, No. 29, Oslo, available at: <https://www.eu3d.uio.no/publications/eu3d-research-papers/2022/eu3d-rp-29-anagnostou.pdf>

15 Ioannides, I. et al, (2026), *Paving the way to EU enlargement. Assessing economic trends and future prospects*, European Parliamentary Research Service, available at: [https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI\(2026\)774735](https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI(2026)774735)

16 Zeneli, S. & Smolica, G. (2026), *Pathways to Gradual Integration: A Comparative Analysis of the EU Association Framework*. Re-ACT Lab, available at:

The SAAs emerged from the Stabilisation and Association Process, launched in the early 2000s, with the aim to promote peace and stability in the Western Balkans, while establishing a credible long-term prospect of EU membership for the region. By contrast, given the fact that the Trio countries historically had not been offered a formal EU perspective, both them and the EU had an interest to explore alternative avenues for strengthening their mutual relations. In this context the signing of AAs, followed by the establishment of the DCFTAs in the mid-2010s, paved the way for closer economic and trade cooperation between the parties, while the “more for more” cooperation approach allowed to maximize the benefits associated with gradual access to the EU Single Market.

With reference to the civil society, the Stabilisation and Association Agreements contain no explicit provisions for a formal involvement in the implementation of the related provisions or monitoring. A similar approach is also reflected by CEFTA and in the Working Plan of the Common Regional Market, which do not foresee any formal mechanism of participation or consultation of the WB6 civil society.¹⁷ This is a missed opportunity to make use of the technical knowledge and embedded potential to enhance legitimacy.¹⁸

By contrast, the AA/DCFTAs provide for a dedicated chapter with legally binding provisions on the cooperation with and involvement of civil society.¹⁹ For instance, the EU–Ukraine Association Agreement establishes a Civil Society Platform, which serves to meet, exchange perspectives and gather CSOs’ input on a regular basis. It is tasked to promote the exchange of experience between the parties, facilitate CSOs participation in monitoring the implementation of the agreement, and deepen mutual knowledge and understanding (art. 443). Moreover, the parties commit to foster dialogue and cooperation between civil society stakeholders from both sides as well as facilitate the consolidation of CSOs (art. 444). The platform brings together members of the European Economic and Social Committee (EESC) and representatives of the civil society of Ukraine (art. 469). Moreover, the Civil Society Platform is formally informed of the decisions adopted by the Association Council and, in turn, may submit its own recommendations (art. 470).

Another illustrative example is the EU-Moldova Civil Society Platform, established in May 2016, which brings together 10 members from EESC and European civil society networks representing the EU and 10 representatives of CSOs and social partners from Moldova.²⁰ The Civil Society Forum meets regularly, at least twice a year, and adopts a final joint declaration setting out its positions, concerns and recommendations on the EU accession process, on the reforms related to the EU fundamentals’, economic criteria and other policy areas. In the last two meetings, the EU-Moldova Civil Society Platform has expressed its positions regarding the implementation of the Growth Plan and its involvement in the consultation and monitoring process.

https://www.balkanicaucaso.org/wp-content/uploads/sites/8/2026/07/Pathways-to-Gradual-Integration-and-Association-Agreements_Re-ACTLab.pdf

17 Steinbach, A., (2024), *The rocky road to EU accession for Western Balkan countries: Obstacles and lessons from the Eastern Partnership*, Working Paper, Bruegel, p.19, available at:

<https://www.bruegel.org/system/files/2024-03/WP%20Western%20Balkans%20270324%23.pdf>

18 Ibid.

19 Association Agreement between the European Union and Ukraine, available at:

https://eur-lex.europa.eu/eli/agree_internation/2014/295/oj/eng

20 For more information, please consult: <https://www.euromonitor.md/en/rm-cu/#a2>

2. Societal ownership of the Growth Plan in the Balkans and Moldova

The Growth Plan for the Western Balkans was launched in November 2023 and entered into force in May of the following year. Building on this experience, the Commission subsequently proposed the Growth Plan for Moldova, which came into force in March 2025. The plan provides for pre-accession financial assistance to candidate and potential candidate countries, supporting their gradual integration in specific sectors of the EU single market. A similar pivotal facility has also been established for Ukraine to address the multifaceted challenges arising from Russia's war of aggression.

The financial envelope of the Reform and Growth Facility for the Western Balkans amounts to 6 billion euros (in grants and loans), for Moldova's worth up to 1.9 billion, whereas Ukraine Facility is worth 50 billion. The RGF is designed to support economic convergence of these countries, while complementing and reinforcing the financial assistance provided to WB6 under IPA III. The instrument employs a results-based payment mechanism, which implies a gradual and conditional approach to the disbursement of the funds. The envisaged conditionality clauses are intended to function as leverage to encourage the implementation of domestic policy reforms.²¹

In its initial communication addressed to the EU institutions, the Commission did not make any reference to the role envisaged for civil society within the framework of the Growth Plan.²² Nevertheless, a few months later, the regulation establishing the RGF for the Western Balkans explicitly recognized a role for CSOs and social partners. In line with the principle of inclusive partnerships, the regulation assigned to the Commission the duty to ensure for their involvement in the consultation process, including timely access to all relevant information, with a view to enabling their contribution to the design and implementation of the programmes, as well as to the monitoring phase.²³

Moreover, it provides for the close involvement of CSOs in the preparation of the Reform Agenda by each beneficiary country and for their contributions to be duly reflected therein. Among its specific objectives, the Regulation places particular emphasis on ensuring public access to information, public scrutiny, transparency and accountability, as well as involvement of civil society in the decision-making processes.

From its perspective, the Commission considers CSOs involvement in the Reform Agenda a priority under the Reform and Growth Facility, while leaving the extent of their involvement to national authorities. A similar participatory process is foreseen also for Moldova as well as for Ukraine Facility Regulation.²⁴

In practical terms, however, civil society participation in reform agenda shaping and monitoring the Growth Plan implementation across the Western Balkans and Moldova remains uneven and fragmented, with varying levels of involvement across countries. As noticed by a local think tank, there continues to be a clear paradox in the region, as the

21 Steinbach, op.cit.

22 European Commission, (2023), *Communication new Growth Plan for the Western Balkans*. See more at: https://enlargement.ec.europa.eu/2023-communication-new-growth-plan-western-balkans_en

23 Regulation (EU) 2024/1449 of the European Parliament and of the Council of 14 May 2024 on establishing the Reform and Growth Facility for the Western Balkans, available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401449

24 Follow-up from the Commission INT/1058, op.cit.

enthusiasm for EU integration process across the civil society coexists with limited institutionalised consultation mechanisms and uneven opportunities for a meaningful policy dialogue.²⁵

The CSOs across the Western Balkans have engaged at national and regional level in the monitoring the implementation of national Reform Agendas under the EU Growth Facility thanks to EU funding and private donor support. Three parallel initiatives are currently running. The WB Reform and Growth Monitor is a regional project implemented by a network of six CSOs, aimed at enhancing transparency, promoting inclusive policy dialogue, and strengthening participatory processes.²⁶ Running until the end of 2027, the project provides an online regional platform for tracking progress in the implementation of national Reform Agendas, complemented by regular monitoring reports.

The second project, funded by the Swiss Government, is being implemented in Albania, where a Reform Tracker has been developed to enhance transparency, strengthen public oversight, and facilitate civic engagement in monitoring reform implementation.²⁷

The last initiative, the National Consultative Mechanism for the Reform Agenda (N-CoMRa), is supported by the Ministry of European Affairs in North Macedonia and serves as a national platform for transparent and inclusive policy dialogue, bringing together more than 150 civil society organisations.²⁸

The inadequate financial support and limited institutionalised funding mechanisms constrain civil society's capacity to perform their watchdog and oversight functions, adversely affecting the safeguarding of civic space, hence undermining the legitimacy and public credibility of reforms.

Evidence emerging from monitoring reports across the Western Balkans suggests that CSOs engagement in the consultative and monitoring processes underpinning the EU Growth Facility is fragmented and varies across countries, limiting their effective capacity to contribute to the policy dialogue and oversight.

Several countries have missed the opportunity to institutionalise cooperation mechanisms with CSOs, excluding the citizens' perspectives in this process.²⁹ For instance, in the case of Albania, the invitation of CSOs in the meetings of the RGF Monitoring Committee has been done on an ad hoc basis. Although two organizations have been offered the possibility to make interventions, still CSOs participation remains unregulated and with limited access to preparatory materials, directly affecting CSOs' ability to engage meaningfully in the process.³⁰ In a joint statement addressed to the Albanian institutions in early spring 2026, 124 CSOs and media outlets highlighted the limited institutionalisation of civil society

25 Cooperation and Development Institute, (2026), *Main conclusions of the conference 'Reflecting on Reform Agenda achievements and exploring future opportunities'*, Tirana, available at: <https://cdinstitute.eu/2026/02/13/conference-reflecting-on-ra-achievements/>

26 For more information, please consult: <https://reform-monitor.org/>

27 For more information, please consult: <https://cdinstitute.eu/scoreboard-albania/>

28 For more information, please consult: <https://epi.org.mk/post/33373?lang=en>

29 Prioni, D., (2026), *Reform Agenda Update - Reform Monitor Albania - 2nd semester 2025*, Institute for Democracy and Mediation, available at: <https://reform-monitor.org/albania-reform-agenda-update-2nd-semester-2025/>

30 Ibid.

participation in policy-making and legislative processes in the frame of EU accession process, an insufficient enabling environment for their engagement, and the absence of a clear institutional approach to supporting civil society development.³¹

Meanwhile in North Macedonia the participation of civil society in the RGF Monitoring Committee has been formally ensured, although on an invitation-based approach and without any membership status or opportunity to contribute to the agenda-setting process.³² In this regard, the invitation-based approach towards the CSOs has been criticised as it determines who is invited or excluded from participation,³³ piloting therefore the course of the debates. Such practices risk reducing CSOs participation to a mere procedural step rather than a genuine and meaningful contribution and ownership to the EU reform processes.

In Moldova, public authorities have demonstrated openness to consultations with civil society in the frame of the Reform Agenda.³⁴ However, the EU-Moldova Civil Society Platform still calls on the national authorities to further develop the ad hoc consultation processes into permanent and institutionalised mechanisms, including through the formalisation of feedback provided by public authorities.³⁵

By contrast, in Serbia, against the backdrop of fragmented relations between civil society and state authorities, the involvement of the European Commission has facilitated the establishment of a tripartite dialogue, leading to the participation of a civil society representative in the RGF Monitoring Committee meetings with full speaking and voting rights.³⁶ The CSOs' representative is elected by the National Convention on European Union—the country's largest civil society coalition.

Another important factor refers to the limited access to public information, traceability of data, systematic publication of official documents, robust reporting, payment requests and other relevant materials, which undermines transparency, accountability, citizens' confidence as well as limits CSOs' effective contribution to consultative meetings and external scrutiny. As stressed also by the EESC in an opinion issued on civil society's role in supporting reforms under the Growth Plans, the time constraints and strict deadlines should not preclude access to information and undermine democratic standards and procedures.³⁷ Otherwise, civil society consultation risks becoming a largely pro forma exercise, leading to governance and accountability deficits. Furthermore, the EESC recognizes that to-date the CSOs consultation

31 National Resource Center for Civil Society in Albania, (2026), *Joint statement of civil society organizations in Albania*. See more at: <https://resourcecentre.al/joint-statement-of-civil-society-organizations-in-albania/>

32 Tair-Selmani, T. (2026), *Reform Agenda Update - Reform Monitor North Macedonia - 2nd semester 2025*, European Policy Institute - EPI, available at: <https://reform-monitor.org/north-macedonia-reform-agenda-update-2nd-semester-2025/>

33 Ibid.

34 European Economic and Social Committee, (2026), *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*, Explanatory Opinion, REX/612-EESC-2026, available at: <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/civil-societys-role-supporting-reform-under-growth-plans-western-balkans-and-moldova-well-ukraines-reform-path>

35 EU-Moldova Civil Society Platform, (2026), *Joint Declaration - 17th meeting in Chisinau*, available at: https://www.eesc.europa.eu/sites/default/files/2026-04/eesc-2026-01116-01-00-tcd-edi_-_clean-1.pdf

36 Todorović, M., (2026), *Reform Agenda Update - Reform Monitor Serbia - 2nd semester 2025*, CEP, available at: <https://reform-monitor.org/serbia-reform-agenda-update-2nd-semester-2025/>

37 European Economic and Social Committee, (2026), op.cit.

practices across the Balkans, Moldova and Ukraine remain still insufficiently documented, limiting the assessment of their impact.³⁸

Overall, adequate funding, institutionalised consultation mechanisms and strengthened civil society capacities across the Western Balkans and the Trio countries would contribute to more inclusive, transparent, and effective EU integration processes. These measures would bridge the existing gap and contribute to strengthening of the implementation and monitoring of reform agendas, improving the quality of public policies, and enhancing accountability and citizen engagement.

3. Civil society transnational networking and advocacy at EU level

Over the years, civil society organizations in the enlargement countries have increasingly invested in strengthening transnational networks with regional and European counterparts and developing independent advocacy initiatives aimed at engaging policy- and decision-makers at EU level. To some extent, the EU funding mechanisms have played a role in this direction, by fostering transnational cooperation by stimulating the formation of cross-border consortia, creating new opportunities for CSOs to build partnerships and engage in joint policy-oriented initiatives.

Interactions between transnational civil society networks and EU institutions in Brussels have intensified over time, with advocacy initiatives contributing to policy developments across a range of policy areas. Within the scope of this policy analysis, two notable examples illustrate the added value of civil society engagement at EU level with respect to the ongoing enlargement related developments. These examples serve to illustrate the capacity of the CSOs, based in enlargement countries, to draw on context-specific expertise and knowledge to develop innovative policy solutions, foster active citizenship and contribute to policy-making processes, besides their complementary role in the shaping and monitoring of policies' implementation at national level.

The first illustrative example is the joint advocacy proposal launched by the European Policy Center (CEP-Belgrade) and the Centre for European Policy Studies (CEPS-Brussels) which put forward a model for the staged accession of the Western Balkans to the EU. The proposal aims to address key challenges affecting the enlargement process while providing a more gradual and credible pathway towards EU membership, leading to a reinvigorated accession process.³⁹ In particular, the proposed model placed an emphasis on the socio-economic dimension of the WB6 integration process, arguing for increased EU financial support to candidate countries to narrow down their existing gaps with EU Member States.⁴⁰ The model

38 Ibid.

39 Emerson, M. et al (2022), *A template for staged accession to the EU*, European Policy Center Belgrade and Centre for European Policy Studies, available at: <https://cep.org.rs/wp-content/uploads/2023/01/A-Template-for-Staged-Accession-to-the-EU.pdf>

40 Chiodi, L. & G. Madhi, (2026), *Western Balkans, strong institutions needed to fight corruption*, Osservatorio Balcani Caucaso Transeuropa, available at: https://www.balcanicaucaso.org/en/cp_article/western-balkans-strong-institutions-needed-to-fight-corruption/

subsequently contributed to the policy debate on gradual integration and provided a relevant input for the approach endorsed by the European Council in 2022. It was later on followed by the launch of the EU's Growth Plan for the Western Balkans and the Reform and Growth Facility, which translated some aspects of staged accession into a framework for additional financial support and reform-based integration.

A second key area of policy engagement concerns the Global Europe instrument proposed under the forthcoming Multiannual Financial Framework 2028–2034. As elaborated in chapter 2 of this report by Raffaella Coletti, this new instrument is expected to directly affect the Union's external action and funding priorities, and particularly for what concerns civil society support in the enlargement countries. The proposed regulation establishing the Global Europe instrument builds on the principle of inclusive partnership, drawing on the experience of the RGF. It explicitly calls on the Commission to ensure that CSOs are consulted and have access to relevant information, enabling them to participate meaningfully in the design, implementation, and monitoring of programmes and actions under this instrument.⁴¹

As MFF negotiations enter a new phase under the Irish Presidency of the Council -expected to help bridge diverging positions among Member States-, several transnational civil society networks have publicly called for enlargement and its associated financial envelope to be established as a core priority within the Global Europe instrument. They have also advocated for the inclusion of appropriate funding mechanisms and safeguards that would allow civil society to meaningfully contribute in the shaping, implementation and oversight of EU reform processes.

In October 2025, a transnational coalition of 46 CSOs from the Western Balkans, Moldova, and Ukraine submitted a joint appeal to the European Parliament and EU Member States, calling for the establishment of a dedicated “enlargement” budget envelope within the Global Europe instrument to support the integration of these countries.⁴² The coalition proposed a dedicated “pre-accession transition” budget line to bridge the gap between the negotiation phase and EU membership, a phased approach to accessing cohesion funds, and the inclusion of civil society in pre-accession funding processes. From the coalition's perspective, the future IPA IV instrument should combine the strengths of previous IPA programmes with the performance-based approach introduced through the RGF.

A second open letter to the EU institutions was issued by the Balkan Civil Society Development Network (BCSDN) in April 2026, calling for a distinct budgetary priority for enlargement, with dedicated and predictable allocations for civil society.⁴³ The proposal highlights a broader policy concern, namely without dedicated resources and appropriate safeguards, civil society risks remaining a peripheral stakeholder in the enlargement process, despite its recognized role in monitoring reforms and strengthening of transparency and

41 *Proposal for a Regulation of the European Parliament and of the Council establishing Global Europe*, COM/2025/551 final, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025PC0551>

42 Europe Plus, (2025), *46 Civil Society Organisations Call on the EU to Embed Enlargement in the Next. A Joint Appeal to the European Parliament and EU Member States*, available at: https://europe-plus.com/wp-content/uploads/2025/10/EC_Joint-letter_enlargement-in-MFF-20282034.pdf

43 Balkan Civil Society Development Network, (2026), *Enlargement and Civil Society in the 2028–2034 MFF: Call for Safeguards, Participation and Dedicated Funding*, available at: <https://balkancsdn.net/novo/wp-content/uploads/2026/04/MFF-letter.pdf>

accountability.

As negotiations on the MFF 2028–2034 continue, the Irish Presidency is expected to present a revised negotiation package in mid-October 2026. At this stage, it remains uncertain to what extent the recommendations put forward by civil society networks from the enlargement countries will be reflected in the emerging framework. However, the EU's recognition of civil society as a key partner in the implementation of accession-related reforms represents an important footprint. The next stage should be supported by adequate financial resources, alongside formal participation and institutionalisation mechanisms that can help reduce the risks of politicisation and ad hoc practices by national authorities.

Conclusions

This policy analysis has shown that over the decades the EU policy towards the civil society's engagement has evolved, recognizing it as a partner in the enlargement process. However, the situation still differs at national level, where the CSOs engagement in EU related reforms remains uneven, largely political and weakly institutionalised.

The comparison between the legal frameworks governing EU relations with the Western Balkans and with the Associated Trio shows that the EU has followed a different approach regarding CSOs engagement. While the Association Agreements and DCFTAs with the Associated Trio countries contain binding provisions and dedicated Civil Society Platforms. The Stabilisation and Association Agreements with the WB6 do not foresee any formal role for CSOs in implementation or monitoring. This gap deprives the region of technical expertise and of the legitimacy that structured civil society involvement could bring to the accession process.

The Growth Plan for the Western Balkans and the Reform and Growth Facility partially address this gap by explicitly acknowledging the importance of consulting CSOs in the design, implementation and monitoring of reform agendas. In practice, however, the modalities are left to national authorities, and the results are fragmented. Serbia, where EU involvement enabled a CSO representative to sit on the RGF Monitoring Committee with full speaking and voting rights, stands at one end. Ad hoc and invitation-based practices, as in Albania and North Macedonia, stand at the other. Such arrangements risk turning participation into a formality, since national authorities decide who is invited and what is discussed. Limited access to information, tight deadlines, insufficient funding and poor documentation of consultation practices further constrain the capacity of CSOs to exercise their watchdog function. As the Growth Plans are temporary political instruments, they cannot by themselves substitute for a lasting legal and institutional basis for civil society engagement.

Civil society has nonetheless proved to be a proactive actor. National and regional monitoring initiatives, such as the WB Reform and Growth Monitor, Albania's Reform Tracker and North Macedonia's N-CoMRa, show a willingness to fill accountability gaps, often thanks to

external donor support. Furthermore, the joint appeals of the CSOs from the Western Balkans demonstrate once more their interest in bridging the direct communication with EU institutions and advocate on specific policy issues. In the frame of the next MFF, through the joint appeals, the CSO coalitions aim to secure a dedicated enlargement envelope and predictable funding for civil society in the Global Europe instrument. Whether these demands will be reflected in the upcoming MFF remains still uncertain, but they show that civil society is seeking to shape the framework and not merely to react to it.

The EU should consider alternative ways to embed the civil society consultation in the legal framework governing its relations with the Western Balkans, drawing on the experience of the Civil Society Platforms under the AA/DCFTAs for the Associated Trio. Building on the experience of the consultations held under the Growth Plans, there should be assessed the opportunities to set some minimum standards for CSOs consultation in the future Global Europe instrument, covering timely access to documents, transparent selection criteria and formal feedback on the contributions received, so that participation does not depend on the goodwill of national governments. The systematic documentation of the consultation practices in the enlargement countries would further allow for the assessment of the impact of the civil society engagement.

Moreover, dedicated and predictable funding for civil society should be secured both in the next MFF and in the national budgets of the enlargement countries. Only in this way, the civil society organizations can sustain the monitoring of reforms and advocacy activities beyond the length of individual projects or one-off initiatives.

Ultimately, gradual integration and the Growth Plan can accelerate convergence, but their credibility depends on transparent, accountable and inclusive reform processes. Without institutionalised civil society participation and adequate resources, civil society risks remaining a peripheral stakeholder in a process whose success depends on society-wide ownership of the reforms.