

Partnership and Civil Society Participation in MFF

Implementing the
Partnership Principle in EU
Programmes under Direct
and Indirect Management



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Index

1. Introduction	4	4. Civil Society Participation in Programmes under Direct and indirect Management	21
2. Civil Dialogue in the EU Institutional Framework	6	5. Principles for Applying the Partnership Principle to Direct and Indirect Management Programmes (MFF 2028-2034)	25
3. The Partnership Principle in Shared Management Programmes	13	6. Conclusions	30
		7. Annex	32

Introduction

01

The European Union is entering a crucial phase in shaping its next Multiannual Financial Framework (MFF), which will play a central role not only in financing policy priorities but also in strengthening democratic governance, the rule of law, and civic participation across Member States. The European Commission’s political guidelines emphasise that the EU budget must contribute to building open, rights-based, inclusive and resilient societies, grounded in democratic values and respect for the rule of law.

The European Commission’s proposal for the new MFF introduces significant changes to the structure of the financial framework, its instruments, and its governance model. Under the objectives of simplification and flexibility, the proposed model aims to streamline EU funding and align it more closely with key Union priorities. At the same time, it draws on the experience of the Recovery and Resilience Facility (RRF), promoting a stronger focus on results-based investments and reforms as a core approach for the future EU budget.

However, legitimate concerns have been raised by institutions such as the European Court of Auditors, which warn that such an approach “combines policies with different objectives, timeframes and delivery rationales, which could make it more complex, and require trade-offs between priorities¹”. These risks need to be clearly identified, carefully assessed, and effectively mitigated in the design of the new framework.

¹ European Court of Auditors, *EU budget 2028-2034 - The ECA’s view: Many changes may not make it better*, p. 9, Publications Office of the European Union, 21 May 2026.

This report aims to provide insights into how the future MFF can genuinely deliver on the objectives of simplification and flexibility, while ensuring high added value, effective governance, and quality investments necessary for the success of the European project in a time of crisis and economic transformation.

To this end, this report examines the core principles enshrined in the EU Treaties that underpin democratic engagement, transparency, and good governance. It connects these principles with EU policy frameworks on democracy and civil society space, and analyses their relevance for EU funding. It also draws lessons from the implementation of existing instruments, such as the Recovery and Resilience Facility, Cohesion Policy funds, the Instrument for Pre-accession, and Horizon programmes.

Finally, this report outlines key principles and proposes structures to strengthen the application of the partnership principle and participatory governance in programmes under both direct and indirect management in the MFF 2028–2034.

Civil Dialogue in the EU Institutional Framework

02

2.1 Overview of the Legislative and Political Bases for Civil Society Participation

Civil society dialogue in the EU budget is not optional; it is both a Treaty-based obligation and a legal requirement anchored in EU secondary law and international conventions, notably the Aarhus Convention², Convention on Rights of People with Disabilities³ and the European Code of Conduct on Partnership.

At primary law level, Article 11(2) of the Treaty on European Union (TEU) establishes that “the institutions shall maintain an open, transparent and regular

dialogue with representative associations and civil society”. This provision is closely linked to Article 1 TEU, which calls for decisions to be taken “as openly as possible and as closely as possible to the citizen”. Together, these provisions form a constitutional basis for participatory democracy in the European Union.

Organised civil society plays a key role in facilitating participation and expressing the diversity of views, needs and aspirations of individuals and societal groups. Civil society participation is therefore a fundamental component of European democracy: it enhances **the legitimacy of EU policies** and helps ensure that legislation and funding instruments respond effectively to the realities faced by citizens. In this context, structured dialogue between EU institutions and civil society is essential for

² UNECE, *Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention)*, accessed 1 June, 2026.

³ The United Nations, *Convention on the Rights of Persons with Disabilities (UNCRPD)*, accessed 15 June 2026

building trust in democratic governance.

The establishment of Article 11(2) TEU itself reflects the need for a more formalised and institutionalised framework for civil dialogue at EU level.

Another legal reference for public participation in decision making is the UN Aarhus Convention, which reinforces participatory rights in environmental decision-making. Article 6 provides for early and effective public participation in decisions on specific activities, including those supported by public funding, where they may have a significant impact on the environment. This introduces a binding standard for transparency and participation that is directly relevant to EU-funded programmes and investments. The Convention is transposed with directives on access to information, public participation and access to justice on environmental matters⁴. These provisions are also rooted in broader principles of EU law, **notably the prevention of harm and the precautionary principle**. The precautionary principle, which has its origins in the early development of European environmental policy and was progressively embedded in the Treaty framework—starting from the Single European Act and further consolidated in subsequent Treaty revisions—reflects the foundational idea, already present in the Treaty tradition since the Treaty of Rome, that action should be taken to prevent harm even in situations of scientific uncertainty.

The Aarhus Convention operationalises this principle by ensuring early and meaningful public participation, allowing potential risks to be identified and addressed at an early stage, strengthening accountability, and contributing to more sustainable and legitimate decision-making.

These provisions are also rooted in broader principles of EU law, notably the prevention of harm and the precautionary principle. The precautionary principle, which has its origins in the early development of European environmental policy and was progressively embedded in the Treaty framework—starting from the Single European Act and further consolidated in subsequent Treaty revisions—reflects the foundational idea, already present in the Treaty tradition since the Treaty of Rome, that action should be taken to prevent harm even in situations of scientific uncertainty. The Aarhus Convention operationalises this principle by ensuring early and meaningful public participation, allowing potential risks to be identified and addressed at an early stage, strengthening accountability, and contributing to more sustainable and legitimate decision-making.

As part of the general obligations of the Convention on the Rights of Persons with Disabilities, the EU institutions must closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organizations on the development and implementation of legislation and policies to implement the Convention, as well as in other decision-making processes concerning issues relating to persons with disabilities. In addition, the equal right of all persons

⁴ Directive 2003/4/EC (Access to Environmental Information), Directive 2003/35/EC (Public Participation in Environmental Decision-Making) and Regulation (EC) No 1367/2006 modified by Regulation (EU) 2021/1767 (Access to Justice in Environmental Matters)

with disabilities to live in the community, with choices equal to others, as well as access, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas is an important provision that has been included among the funding conditionalities for the Cohesion Funds.

SHARED MANAGEMENT FUNDS (COHESION FUNDS +)

At the level of EU secondary legislation, the European Code of Conduct on Partnership was first adopted as Delegated Act in 2014 to support and guide member states in organising the partnership principle, particularly in the context of EU funds under shared management. It requires Member States to involve relevant partners in the preparation, implementation, monitoring and evaluation of programmes. The Code explicitly highlights the importance of including stakeholders “which can significantly influence or be significantly affected by implementation of the Partnership Agreement and programmes”. It also stresses the need to ensure the participation of groups that are often underrepresented, particularly those at risk of discrimination or social exclusion, such as persons with disabilities, migrants and Roma communities.

Importantly, the provisions of the Code of Conduct are closely linked to the EU Charter of Fundamental Rights, in particular

the principles of non-discrimination (Article 21), participation in democratic life (Article 10(3) TEU in conjunction with Charter values), and good administration (Article 41). This linkage was further strengthened by the Treaty of Lisbon, which gave the Charter the same legal value as the Treaties, embedding fundamental rights—including participatory rights—at the core of EU governance. By requiring inclusive and meaningful participation in EU-funded programmes, the Code contributes to the practical implementation of these fundamental rights, ensuring that EU funding respects equality, accessibility and participatory governance standards.

The Common Provisions Regulation governing EU shared management funds, together with the Code of Conduct on Partnership, has been progressively strengthened over the last two programming periods. In parallel, requirements to ensure compliance with the Charter of Fundamental Rights have also been reinforced. In the 2021–2027 period, the Code of Conduct became legally binding, while the definition of partners and the clarification of their roles and responsibilities were further developed. (See image: *The Partnership Principle & Code of Conduct. Evolution across EU budget periods.*)

CIVIL SOCIETY ENGAGEMENT IN EU EXTERNAL ACTION

In 2012, the European Commission adopted the Communication “*The Roots of Democracy and Sustainable Development – Europe’s Engagement with Civil Society in External Relations*”. The Communication recognises that “an empowered civil society is a crucial component of any democratic system and is an asset in itself.”⁵– This communication continued the previous provisions relating to CSOs set in EU policies and international commitments such as under the 2011 Busan Partnership on Effective Development Cooperation⁶.

It sets out three priorities, including in particular the promotion of **meaningful and structured participation of civil society organisations (CSOs) in the EU programming cycle and in international processes**, alongside objectives related to enabling environments and capacity building for CSOs.

It marked the beginning of a concerted effort by the European Union and its Member States to deepen strategic engagement with civil society in partner countries around the world. At the heart of this initiative lies the development of EU Civil Society Roadmaps. They serve as a unified strategic framework that guides the EU Delegations and Member States in their collaborative efforts to empower civil society at the national level.

⁵ *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. The roots of democracy and sustainable development: Europe’s engagement with Civil Society in external relations*, accessed 01.06.2026

Building on this policy framework, the principle of **inclusive partnership and transparency** has been incorporated into the legal basis of EU external financing instruments, notably:

- Regulation (EU) 2021/947 establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe⁷
- Regulation (EU) 2021/1529 establishing the Instrument for Pre-accession Assistance (IPA III)⁸

These regulations establish a general principle requiring the Commission, where appropriate, to ensure that relevant stakeholders – including civil society organisations and local and regional authorities are **duly consulted**, have **timely access** to relevant information, and are able to **play a meaningful role in the design, implementation and monitoring of programmes**.

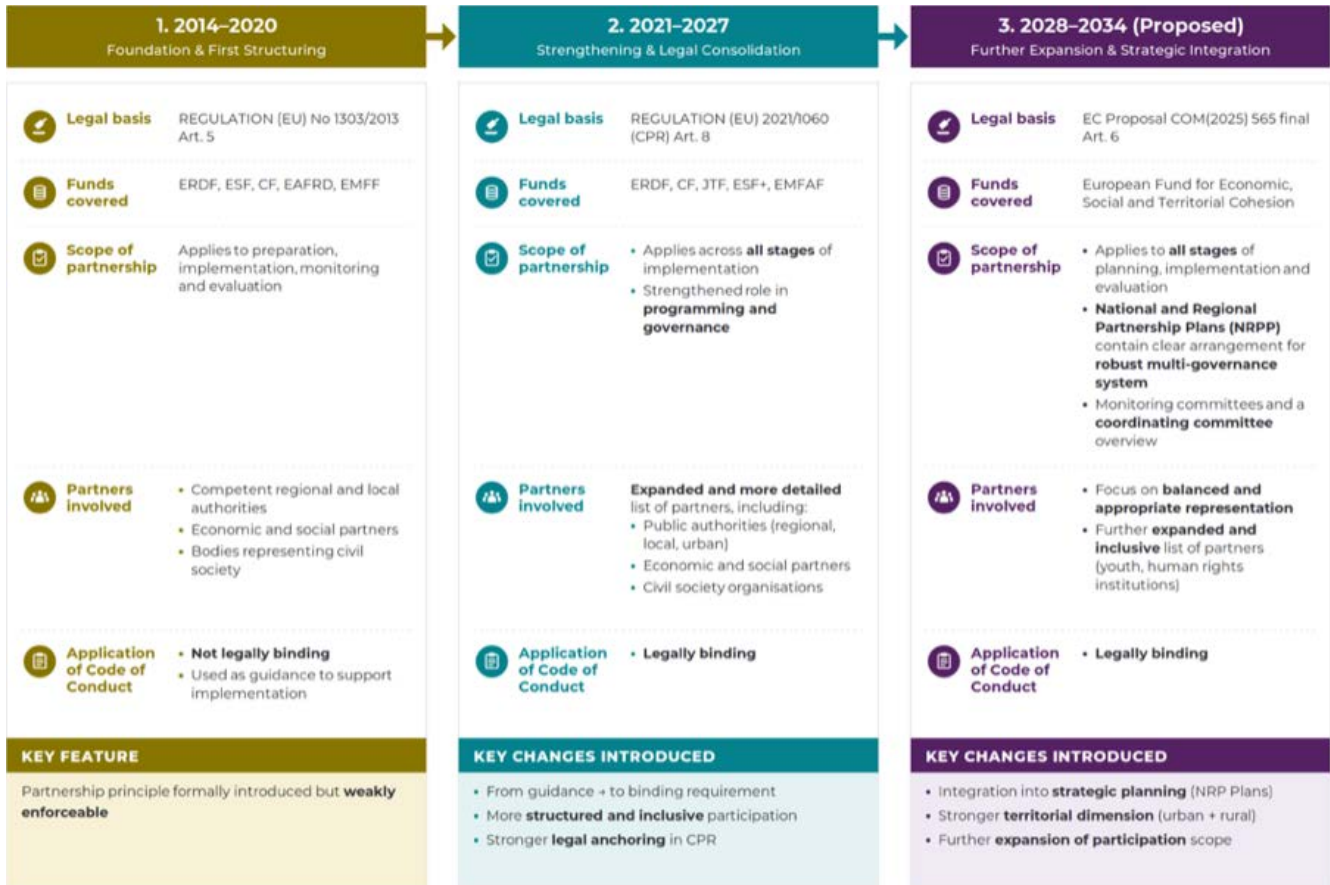
⁶ OECD (2011), *Busan Partnership for Effective Development Co-operation: Fourth High Level Forum on Aid Effectiveness, Busan, Republic of Korea, 29 November - 1 December 2011*, Best Practices in Development Co-operation, OECD Publishing, Paris, <https://doi.org/10.1787/54de7baa-en>.

⁷ *Regulation (EU) 2021/947 of the European Parliament and of the Council of 9 June 2021*, art 8, p.6, second paragraph, accessed

⁸ *Regulation (EU) 2021/1529 of the European Parliament and of the Council of 15 September 2021*, art 6, p.5, Accessed 1 June 2026

The Partnership Principle & the Code of Conduct - Evolution Across EU budget Periods

From guidance to binding commitment - expanding participation for better governance and stronger impact



WHY IT MATTERS

- Enhances democratic legitimacy
- Improves transparency and accountability
- Better alignment with real needs
- Higher quality and efficiency of investments
- Promotes cohesion across the EU

Image generated with Bankwatch Claude AI

At the political level, the role of the EU budget—particularly the future Multiannual Financial Framework (MFF 2028–2034)—is increasingly understood as going **beyond a financial planning tool**. It is also a strategic instrument to uphold the rule of law, strengthen democratic governance, and support civil society during implementation.

This includes reinforcing the link between the Rule of Law Report and EU funding, promoting investments that enhance institutional integrity and civic space, and ensuring accessible, sustainable funding for democratic participation and civil society organisations.

2.2 The Role of Civil Society in Efficiency and Quality of EU Funding

Strengthening structured civil society engagement is not only a democratic requirement but also a key driver of better-performing EU investments. Its benefits can be understood across three interrelated dimensions:

2.2.1 Effectiveness and Purpose of Investments

Civil society engagement contributes to ensuring that EU investments are better aligned with real needs and policy objectives. In the context of major transitions—such as the green and digital transitions—there is a growing need to carefully assess what constitutes the most appropriate measures for specific target groups and policy goals.

A tailored approach is essential, reflecting the diversity of regions, challenges and socio-economic contexts across the Union. This flexibility—often requested by Member States—requires informed decision-making that can only be achieved through meaningful engagement with stakeholders who bring ground-level expertise. Civil society organisations play a key role in identifying needs, testing assumptions, and ensuring that investments are relevant and impactful.

Moreover, the scarcity of public resources increases the need for efficient and innovative use of EU funding. Structured engagement can support the development of transformative and holistic solutions—such as investments that simultaneously address climate objectives (e.g. CO₂ reduction), social challenges (e.g. inequalities and poverty), and long-term sustainability (e.g. resource efficiency, circular economy, supply chain resilience). Such integrated approaches enhance the added value of EU funding.

In addition, well-designed public investments can leverage further long-term investments from citizens, companies and financial institutions. Civil society engagement helps ensure that funding strategies are credible, inclusive and capable of mobilising broader societal support.

2.2.2 Access and Better Distribution of Funding

The increasing demand for efficiency, added value and transformative impact of EU funding is closely linked to the quality of partnership. Civil society organisations and stakeholders represent and bring expertise about specific target groups and beneficiaries of EU funds, including those who are often underrepresented or harder to reach.

Effective engagement improves access to funding opportunities and contributes to a more equitable distribution of resources. It helps ensure that investments reach those most in need and that programmes are designed in a way that is accessible and responsive to diverse beneficiaries.

In this sense, investment in partnership should be understood as an investment in improving the overall quality, inclusiveness and added value of EU funding. Strong partnerships enhance ownership, increase the relevance of interventions, and contribute to more balanced territorial and social outcomes.

2.2.3 Prevention of Harm and Misuse

While compliance with EU legislation and the rule of law has been strengthened in the current budget period, including through enhanced accountability frameworks, the prevention of harm remains a critical challenge. This includes avoiding unintended negative impacts, such as the creation of perverse incentives, loopholes in programme design, or risks of misuse and inefficient allocation of funds.

Civil society organisations, through their proximity to communities and their thematic expertise, are well positioned to identify potential risks at an early stage. Their involvement can help detect weaknesses in programme design, flag potential negative impacts, and contribute to more robust and resilient implementation frameworks.

A whole-of-society approach—taking into account public and community interests—requires the systematic involvement of partners in identifying, assessing and mitigating risks. This is particularly important in areas where there is a higher risk of misuse or “privatisation” of public funds.

Evidence from civil society monitoring, as well as findings from the European Court of Auditors and the European Public Prosecutor’s Office, indicate that cases of misuse and

inefficient use of EU funds persist. This demonstrates that preventive mechanisms are not yet sufficiently developed and highlights the need for stronger, more structured participation of civil society as a complementary layer of accountability that proved effective where such practices exist.

2.3 Implications for Policy Effectiveness, Transparency and Governance

Findings from the European Court of Auditors (ECA)⁹ reinforce the link between limited stakeholder engagement and weaker policy outcomes. Divergences in implementation across Member States reduce comparability, weaken ownership, and undermine policy coherence. Insufficient transparency and limited access to information further constrain democratic oversight and reduce the capacity to assess the impact of EU funding.

In this context, structured civil society participation (horizontally - across all funds and vertically - at local, national and EU level) contributes directly to improving policy effectiveness, strengthening transparency, and enhancing governance and accountability systems. It supports better alignment with EU objectives, improves monitoring and evaluation, and helps ensure that public resources are used efficiently and responsibly.

⁹ European Court of Auditors, review 04/2025: “*The Future of EU Cohesion Policy – drawing lessons from the past*”, Publications Office of the European Union, 2025, p.52

The Partnership Principle in Shared Management Programmes

03

3.1 Legal Framework and Operational Mechanisms

In the 2021–2027 programming period, the partnership principle is firmly anchored in the Common Provisions Regulation (CPR) ((EU) 2021/1060), which governs shared management funds, including the European Regional Development Fund (ERDF), the Cohesion Fund (CF), the Just Transition Fund (JTF), the European Social Fund Plus (ESF+), and the European Maritime, Fisheries and Aquaculture Fund (EMFAF).

The CPR set up a requirement for Member States to organise and implement comprehensive partnership (art.8.1), which implies development of a framework that includes rules, guidelines, objectives and capacity dedicated to enforcement of partnership in each country. The framework should also be in line with the multi-level governance principle and use a bottom-up approach (art.8.2)

The regulation requires Member States to apply the European Code of Conduct on Partnership (ECCP) in the preparation and implementation of these funds. In particular, Article 10 establishes the obligation to prepare Partnership Agreements (PAs) in cooperation with relevant partners. These agreements define the strategic framework for the use of EU funds and ensure coherence and complementarity with other Union instruments, such as the Asylum, Migration and Integration Fund (AMIF), the Internal Security Fund (ISF), the Border Management and Visa Instrument (BMVI), and centrally managed programmes such as LIFE and Horizon Europe.

The partnership principle also applies to the preparation and modification of programmes (Article 22 CPR), ensuring that stakeholders are involved in shaping priorities, investment strategies and implementation mechanisms. Furthermore, the CPR embeds partnership in governance structures, notably through the establishment and functioning of Monitoring Committees (Articles 38 and 39), where partners are expected to participate in overseeing programme implementation.

In addition, Member States are required to use technical assistance (Articles 36 and 37 CPR) to support the effective functioning of the partnership, including through capacity-building measures for civil society organisations and other stakeholders, enabling them to participate as competent and equal partners.

Beyond the regulatory framework, the 2021–2027 period introduced additional mechanisms to support the operationalisation of the partnership principle at EU level:

- the Dialogue with Common Provision Regulation Partners¹⁰ as defined in Article 8(5) is organised by the EC at least once a year to consult organisations that represent partners at Union level on the implementation of programmes. The outcomes of the dialog shall be reported to the European Parliament and Council;
- the European Community of Practice on Partnership (ECCP)¹¹, which facilitates exchange of experience, peer learning, and the development of guidance, recommendations and good practices through annual meetings and thematic working groups. Over 150 experts from managing authorities and partners met for the first time on 26 April 2022, and organised in working groups with specific objectives.

Together, these provisions and mechanisms establish a comprehensive framework aimed at ensuring inclusive, transparent and participatory governance of EU funds under shared management.

150

experts from managing authorities and partners met for the first time on 26 April 2022

¹⁰ The European Commission, *Dialogue with Common Provisions Regulation partners 2021-2027*, accessed 6 June 2026.

¹¹ The European Commission, *European Community of Practice on Partnership (ECoPP)*, accessed 6 Jun 2026.

The CPR Framework for Comprehensive Partnership

Inclusive, Transparent and Participatory Governance of EU Funds

Member States Obligation

Organise and implement comprehensive partnership in line with multi-level governance and a bottom-up approach.

This requires a clear framework with:

-  **Clear rules and guidelines**
-  **Clear objectives**
-  **Dedicated resources**
-  **Enforcement of partnership**

BALANCED REPRESENTATION engages four key stakeholder groups:

- A** Authorities (regional, local, urban)
- B** Economic and social partners
- C** Bodies representing civil society
- D** Research organisations and universities

HORIZONTAL FRAMEWORK
AT NATIONAL LEVEL

-  **Clear national framework**
Rules, guidelines and procedures for partnership across all stages of the programme cycle.
-  **Inclusive and representative participation**
Engagement of economic, social partners, civil society, regional and local authorities and other relevant stakeholders.
-  **Coherence and coordination**
Partnership across funds, policies and governance levels.
-  **Dedicated resources**
Including technical assistance and capacity building for partners.

VERTICAL SYSTEM OF PARTNERSHIP
MULTI-LEVEL AND BOTTOM-UP ENGAGEMENT

- 1 Preparation of Partnership Agreements (PAs)**
Contract between Member State and EC defining priorities and allocation of EU funds.
- 2 Preparation and modification of Cohesion Policy Programmes**
Programmes that put in practice the Partnership Agreements by shaping priorities, investment strategies and implementation mechanisms.
- 3 Participation in implementation, monitoring and evaluation through Monitoring Committees**
Partners participate in overseeing implementation and contribute to shaping objectives, targets, criteria and investment measures.
- 4 Allocate resources for capacity building of partners**
Use technical assistance to strengthen the administrative capacity of social partners and civil society organisations to participate as competent and equal partners.

EU-LEVEL SUPPORTING MECHANISMS

Annual Dialogue with CPR Partners (Art. 8(5))
The Commission organises at least once a year a dialogue to consult organisations representing partners at EU level on programme implementation.
Outcomes are reported to the European Parliament and Council.

European Community of Practice on Partnership (ECOPP)
Facilitates exchange of experience, peer learning and the development of guidance, recommendations and good practices through annual meetings and thematic working groups.
150+ experts from managing authorities and partners involved.



OUTCOME Better governance, stronger ownership, higher quality investments and greater impact of EU funds.

3.2 Evidence from Practice

The strengthened regulatory framework in the 2021-2027 Budget period and the introduction of dedicated support mechanisms like ECCP, have substantially contributed to measurable improvements in the implementation of the partnership principle in several Member States.

Evidence from the European Community of Practice on Partnership¹² highlights how Member States have implemented partnership requirements under the CPR and where they have **gone beyond minimum legal obligations** to establish stronger, more effective participatory governance.

3.2.1 Meaningful Consultation of Partners and Citizens

LEGAL REQUIREMENT:

The CPR and Code of Conduct on Partnership (Art. 5) require Member States to **consult partners in the preparation of Partnership Agreements and programmes**, ensuring timely access to information and opportunities to provide input.

GOOD PRACTICES BEYOND COMPLIANCE:

1. **Early and structured engagement** rather than late-stage consultations.
2. Use of **diverse consultation methods**: questionnaires, thematic working groups, roundtables, seminars, and public consultations (e.g. Belgium, 7 of 16 Germany regions, Portugal, Estonia, Spain, Cyprus, Bolzano region in Italy).
3. **Targeted consultations on specific funds or priorities** (e.g. France on HOME funds, Just Transition Plans in Slovenia and Poland).
4. **More frequent and continuous consultation processes** (e.g. Estonia).
5. Creation of **accessible information repositories** (e.g. Greece).
6. Establishment of **permanent information structures** (e.g. Just Transition information centres in Slovenia).
7. Use consultation and working groups with partners in **other EU funding instruments (e.g. Social Climate Fund and Recovery and Resilience Fund)** where partnership was not required (e.g. Poland)

¹² The European Commission, *Examples of Good Practices on Partnership*, accessed 1 June 2026.

3.2.2 Clear and Long-Term Frameworks for Participation

LEGAL REQUIREMENT:

Member States must organise partnership and may use Technical Assistance to support its functioning (CPR Articles 36–37), but **no detailed obligation exists on national frameworks.**

GOOD PRACTICES BEYOND COMPLIANCE:

- Development of **national partnership strategies and guidance**:
 - *Poland*: National guidelines on partnership implementation, including capacity-building measures and **formal structures (sub-committee on partnership)** with strong CSO representation (at least 25%).
 - *Portugal*: National Action Plan for capacity building, based on **systematic needs assessment**, linking partnership to governance reforms.
- Establishment of **dedicated partnership structures and working groups** (e.g. 13 Polish programmes include partnership working groups).
- Long-term investment in **capacity, coordination, and preparedness of partners.**
- **Involving civil society in shaping capacity-building priorities** (e.g. Latvia).

- **Financial compensation for participation and capacity-building efforts** (e.g. Hungary¹³).
- **Dedicated projects supporting Monitoring Committee members**, funded through Technical Assistance (e.g. Poland, Czechia, Slovakia).
- Long-term investment in **expertise and institutional capacity of CSOs.**

¹³ Measures envisaged under the Implementation Operational programme for Umbrella NGOs and capacity building for Monitoring Committee members in the beginning of the funding period 2021-2027

3.2.3 Inclusive and Transparent Selection of Partners

LEGAL REQUIREMENT:

The Code of Conduct requires **transparent and representative selection of partners**, but leaves implementation flexible.

GOOD PRACTICES BEYOND COMPLIANCE:

- **Expanding participation beyond minimum categories of partners:**
 - *Estonia:* Targeted inclusion of underrepresented groups (youth, civil society, business), including NGOs and rights organisations in asylum programmes.
- **Using networks as multipliers of participation:**
 - *Ireland:* Engagement through national and regional networks to broaden outreach and accessibility.
- **Recognising self-organised civil society structures:**
 - *Hungary:* Acceptance of NGO delegates elected by civil society gathering of environmental NGOs as official representatives¹⁴.

These approaches improve **representativeness, legitimacy, and connection to constituencies**.

3.2.4 Monitoring Committees: From Formal Requirement to Effective Governance Tool

LEGAL REQUIREMENT:

The CPR (Articles 38–39) requires the establishment of Monitoring Committees (MCs), with at least **annual meetings** and partner participation. However, Member States have flexibility in structure and functioning.

GOOD PRACTICES BEYOND COMPLIANCE:

Structure and organisation

- Diverse models reflecting national contexts:
 - Single MC (e.g. Estonia) vs. multi-level systems (e.g. Poland).
- Innovative approaches for Just Transition Fund governance:
 - Sub-committees, working groups, and steering groups (e.g. Poland, Czechia, Romania, Slovakia).

Positive practices

- **Inclusive composition:**
 - Estonia: less than 50% government representation; strong inclusion of youth, social and disability organisations.

¹⁴ Since 2000 the Environmental NGOs platform has been recognised by the government as an official mechanism for election of environmental NGO representatives. Only in relation to the RRF Monitoring Committee the government opened a call for applications.

→ **Frequent and well-prepared meetings:**

- Poland: up to 10 meetings per year, longer deadlines for document review enabling wider consultation.

→ **Strengthening the role of partners in decision-making**, not only advisory functions.

3.2.5 Strengthening the Quality of Participation through Expertise

LEGAL REQUIREMENT:

Partners should be involved, but there is **no detailed requirement on integrating their expertise into decision-making**.

GOOD PRACTICES BEYOND COMPLIANCE:

→ **Use of CSO expertise to improve programme design and implementation:**

- Improving selection criteria to better meet beneficiaries' needs (e.g. Slovakia, Poland, Hungary¹⁵).
- Developing thematic guidance (e.g. DNSH guidelines and working groups in Poland).

This ensures participation contributes to **better policy outcomes**, not only procedural compliance.

Across all areas, **legal provisions establish minimum procedural guarantees**, while **good practices focus on quality, inclusiveness, and effectiveness of participation**—transforming partnership into a **driver of better governance and higher-quality EU investments**.

¹⁵ Recommendation of environmental CSOs representatives in monitoring committees were accepted improved criteria for the call for proposals.

3.3 Strengths and Remaining Challenges of the Current Partnership Model

Despite these positive developments, and the existence of a strong legal and policy framework supporting civil society participation and the partnership principle for EU programmes under shared management, a significant gap persists in their effective implementation across Member States. While EU law requires meaningful partnership and participatory governance, the implementation of the partnership principle remains uneven across Member States—and, in some cases, across sectors and regions within the same country. This unevenness has been consistently highlighted in analyses and recommendations from EU institutions and advisory bodies, including the European Court of Auditors (ECA), the European Economic and Social Committee (EESC)¹⁶, the Committee of the Regions (CoR)¹⁷, and the European Community of Practice on Partnership.

In several Member States—particularly in parts of Central and Eastern Europe—citizen and civil society involvement in EU budget planning and implementation is frequently formalistic, fragmented, or restricted to narrow expert consultations. In many cases, stakeholders such as civil society organisations, young people, and representatives of vulnerable groups are involved too late in the process, provided with insufficient information, or excluded from the stages where strategic priorities and investment decisions are defined. Evidence from civil society monitoring further confirms these trends: analyses by the CEE Bankwatch Network in December 2022, conducted

just before the European Commission's final approval of Member States' plans, showed that many Partnership Agreements and Operational Programmes were not fully aligned with the Code of Conduct on Partnership¹⁸. Similarly, a Generation Climate Europe report assessing youth involvement in the Just Transition Fund across 15 Member States found highly uneven experiences, ranging from very positive examples to extremely limited or ineffective participation¹⁹.

ECA findings, including those related to the Recovery and Resilience Facility, underline the broader governance risks associated with divergent national approaches:

“The approach... differs among member states... lack of a harmonised approach affects comparability... and poses a risk of unequal treatment.”²⁰

This variability has direct implications for the effectiveness of EU spending. Uneven application of participatory principles contributes to differences in how EU priorities are integrated at national and regional level, reinforcing a “multi-speed” implementation of EU policies. It can also lead to less efficient and lower-quality investments, due to weaker alignment with local needs and reduced stakeholder ownership.

¹⁶ EESC, *Opinion on next MFF*, ECO/682-EESC-2025-02245, adopted on 22.01.2022, accessed on 10 June 2026

¹⁷ ECPP, *The Future of the Partnership Principle*, Working paper 2024

¹⁸ F. Canali, *Public participation at stake in participatory processes in the EU*, CEE Bankwatch Network, 16 December 2022.

¹⁹ L. Manca and J. Hunsbeth Schreuder, *The state of youth engagement in the implementation of the Just Transition Mechanism of the EU*, Generation Climate Europe and CEE Bankwatch Network, 2nd edition, October 2022.

²⁰ European Court of Auditors, *Review 02/2025: Performance-orientation, accountability and transparency – lessons to be learned from the weaknesses of the RRF*, 6 May 2025.

Civil Society Participation in Programmes under Direct and Indirect Management

04

4.1 Implementation of the Partnership Principle in Global Europe and IPA III

The partnership principle established under Regulation (EU) 2021/947 (NDICI–Global Europe) and Regulation (EU) 2021/1529 (IPA III) provides a clear legal basis for the inclusive, transparent, and meaningful involvement of civil society organisations (CSOs) throughout the EU external action cycle. In practice, its implementation varies significantly across regions and countries, reflecting differences in political contexts, administrative capacities, and the approaches of EU Delegations.

EMERGING POSITIVE PRACTICES

A number of mechanisms and practices demonstrate efforts to operationalise the partnership principle in a structured and participatory manner.

First, **CSO Roadmaps** developed by EU Delegations represent an important tool for structured engagement. According to the EC²¹ these roadmaps have in several countries evolved into participatory and co-creative processes. In some contexts, they have enabled early involvement of CSOs, structured dialogue with EU Delegations, and the identification at early stage of priority areas for support (e.g. Georgia)²². In other contexts, such as Kenya, roadmaps have also involved broad consultations and mapping exercises, although their influence on subsequent programming has been more limited, highlighting the importance of linking consultation to decision-making.

²¹ EEAS and European Commission Joint Staff Working Document “Supporting Civil Society in Partner Countries: Roadmap for EU Engagement with Civil Society” (SWD(2014) 335 final)

²² CONCORD’s report “Structured Dialogue with Civil Society in EU External Action: Reality Check” (2017)

Second, institutional arrangements within the European Commission have contributed to more systematic engagement. The establishment of **CSO focal points in EU Delegations** and **civil society contact points across Commission Directorates-General**, as well as **regular coordination meetings among CSO focal points**, has improved information-sharing, continuity of dialogue, and internal coherence in engagement with civil society actors.

Third, **support mechanisms and facilities**, including cooperation platforms and dedicated events, have facilitated exchanges between EU institutions and civil society, as well as peer learning. These initiatives have, in some cases, introduced innovative approaches to engagement and capacity-building, while also promoting a “do no harm” approach in sensitive contexts. In fragile and restrictive environments, EU Delegations have adapted funding modalities—such as indirect support mechanisms—to avoid exposing civil society actors to risks.

Fourth, under IPA III, **formal participation structures**, such as monitoring committees, provide institutionalised entry points for civil society engagement in programme oversight. These mechanisms represent an important step towards embedding partnership principles in governance frameworks.

PERSISTENT CHALLENGES AND GAPS

Despite these positive developments, significant challenges remain in ensuring consistent and meaningful implementation of the partnership principle.

A key issue is the **uneven quality and timing of consultations**²³. In many cases, civil society engagement takes place at a late stage of the programming cycle, limiting its influence on strategic decisions. Even where consultations are organised, stakeholders often report insufficient feedback on how their inputs have been taken into account.

Transparency also remains a major concern. In the context of the **Global Gateway strategy** and **Team Europe Initiatives (TEIs)**, information on planned and ongoing investments is not systematically accessible. The absence of a **centralised, standardised, and user-friendly public portal** with comprehensive project-level information—such as funding allocations, implementing partners, and expected impacts—limits accountability and constrains meaningful participation by civil society.

Furthermore, while the regulatory framework emphasises participation, there are **no clear or binding requirements for the involvement of CSOs at project level**, including in the design, implementation, and monitoring of specific interventions. As a result, engagement is often ad hoc and dependent on individual project managers or Delegations, rather than embedded as a standard practice.

²³ CONCORD's report “*Global Europe NDICI Implementation – The Missing Link for Civil Society Engagement*” (2023)

Experience with financing instruments such as the **European Fund for Sustainable Development Plus (EFSD+)**, a key component of Global Gateway, also points to a gap between policy commitments and practice. While these instruments aim to support sustainable development, civil society involvement in investment operations remains limited and insufficiently structured.

At the governance level, the role of the **Civil Society and Local Authorities Advisory Platform** remains to be fully clarified. While it provides a formal channel for dialogue, stakeholders have raised concerns regarding its transparency, its relationship with other governance mechanisms, and its actual influence on decision-making processes.

Finally, there is a lack of clarity regarding **monitoring and evaluation frameworks**, including the annual review of Global Gateway implementation. The absence of clear modalities for assessing progress, including the quality of stakeholder engagement, further limits accountability.

OVERALL ASSESSMENT

Overall, while the legal framework of Global Europe and IPA III establishes a strong commitment to inclusive partnership and transparency, its implementation remains uneven. Positive practices—such as participatory CSO Roadmaps, institutionalised focal points, and structured dialogue mechanisms—demonstrate the potential for meaningful engagement. However, these coexist with persistent challenges related to transparency, consistency, and the depth of participation, particularly at the project and investment levels.

Strengthening the operationalisation of the partnership principle will require clearer standards, improved transparency tools, and more systematic integration of civil society across all stages of the EU external action cycle.

4.2 Implementation of the Partnership Principle in Other instruments

Unlike shared management funds, direct management programmes (e.g. Horizon, LIFE) and indirect instruments (e.g. InvestEU, Modernisation Fund) do not include a formal “partnership principle”.

Nevertheless, certain forms of civil society engagement are embedded in programme design:

In Horizon programmes, engagement is primarily indirect and project-based, notably through:

- Responsible Research and Innovation (RRI)
- Multi-actor approaches (mandatory in selected clusters, e.g. Cluster 6)
- Stakeholder engagement requirements in calls for proposals
- Dissemination, exploitation and communication obligations

As a result, participation tends to be:

- Project-based rather than systemic
- Driven by call-specific requirements rather than governance structures

In the LIFE Programme²⁴, civil society engagement is more directly embedded in programme objectives, reflecting its focus on the implementation of EU environmental and climate policy. In the CERV Regulation²⁵ (art.11), the Civil Dialogue Group is introduced to ensure regular, open and transparent dialog with the beneficiaries of the Programme. Civil society organisations frequently act as:

- Implementers of projects
- Intermediaries between public authorities and citizens
- Drivers of behavioural change

Those programmes promote multi-stakeholder projects involving NGOs, public authorities and local communities. However, engagement largely remains at project level. At programme level, the European Commission and CINEA²⁶ organise feedback and consultation sessions with beneficiaries, providing a limited but structured channel for stakeholder input.

In the case of financial instruments, practices have weakened over time. Under the European Fund for Strategic Investments (EFSI), a Steering Board organised at least annual stakeholder consultations. This practice was not continued under InvestEU, where the regulation contains no explicit provisions for structured civil society dialogue.

Similarly, the Modernisation Fund does not include formal requirements for stakeholder engagement. However, under pressure from civil society organisations (e.g. Bankwatch), some engagement practices have emerged, including national-level consultation mechanisms (e.g. in Czechia) and EU-level annual dialogues.

Overall, civil society engagement in direct and indirect EU funds remains fragmented, largely project-based, and insufficiently anchored in governance structures.

²⁴ Programme for the Environment and Climate Action (LIFE) *Regulation (EU) 2021/783* of the European Parliament and of the Council of 29 April 2021

²⁵ Citizens, Equality, Rights and Values Programme *Regulation (EU) 2021/692* of the European Parliament and the Council of 28 April 2021

²⁶ *The European Climate, Infrastructure and Environment Executive Agency* (CINEA)

05

Principles for Applying the Partnership Principle to Direct and Indirect Management Programmes (MFF 2028–2034)

5.1 Mainstream the Partnership Principle as a Horizontal Requirement Across EU Funding Instruments

The Commission should establish the partnership principle as a **horizontal principle applicable to all EU funding instruments**, including both shared and direct management. This should be reflected in:

- The Performance Regulation

- Specific funds regulations - both shared management and relevant provisions governing centrally managed programmes

This approach would ensure **consistency, coherence and comparability** in the application of partnership requirements across policy areas and funding instruments.

5.2 Develop Secondary Legislation and Operational Guidance

The Commission should complement legislative provisions with **secondary legislation and detailed guidance**, including:

- Updated and strengthened European Code of Conduct on Partnership and a **specific guide for the implementation of the partnership principle** covering also direct and indirect management programmes (e.g. Global Europe, European Competitiveness Fund, AgoraEU),

- **practical toolkits and good practice examples** (e.g. CSO Roadmaps, stakeholder platforms),
- common indicators and benchmarks to **assess the quality of participation**, including annual assessment and reporting on partnership as part of the Annual Reports on Funds implementation with feedback mechanisms for partners.
- Clear requirements on transparency and access to information - **centralised, standardised and user-friendly public portal/s** with project-level information on funding, partners, objectives and results
- Minimum standards for consultation timelines and feedback loops
- Accountability and complaint mechanisms for lack of compliance
- Minimum standards for consultation timelines and **systematic feedback loops**,
- Accountability and complaint mechanisms in cases of non-compliance.

In addition, platforms such as Communities of Practice should be further developed to support **peer learning, exchange of good practices, and continuous improvement.**

5.3 Introduce Minimum Binding Standards for Partnership Implementation in shared and direct management funds through strengthening of the Code of Conduct provision

To address uneven implementation across Member States, the Commission should propose **minimum binding requirements** defining the quality and scope of partnership. These should include:

- Early, continuous and structured stakeholder engagement throughout the programming and implementation cycle

These standards should aim to move beyond formal compliance and ensure **meaningful and effective participation**. This is particularly relevant for countries and areas of intervention where democratic values and political will for partnership are weak and where consultations are often **late-stage, ad hoc, and with limited influence on decision-making.**

5.4 Require Comprehensive National Partnership Frameworks

The Commission should require Member States to establish **comprehensive national partnership frameworks**, ensuring both horizontal and vertical coordination. These frameworks should include:

- Clear rules, procedures and governance structures
- Defined roles and responsibilities of partners at all levels
- Mechanisms for multi-level governance and bottom-up engagement
- Dedicated financial and administrative resources
- Coordination mechanisms and exchange of practice
- Alignment with existing tools such as **CSO Roadmaps**,

Such frameworks should ensure structured participation across:

- Preparation of the multi-annual plans for funds use (e.g. National and Regional Partnership Plans (NRPPs))
- Design and modification of plans (e.g. mid-term review of the NRPPs and its chapters)
- Implementation, monitoring and evaluation

5.5 Strengthen Governance Structures and the Role of Monitoring Committees

The Commission should reinforce the role of governance structures to ensure effective partner involvement by:

- Clarifying the **decision-making role** of Monitoring Committees
- Establishing minimum standards for their composition, ensuring balanced representation of public authorities and partners
- Defining requirements for frequency of meetings, access to documentation, and preparation timelines

Consideration should also be given to the use of **thematic sub-committees or working groups** to enhance stakeholder input in specific policy areas. The composition and operation of sub-committees should also respect the principles of partnership.

5.6 Ensure Systematic Investment in Capacity Building

The Commission should strengthen provisions on Technical Assistance to ensure **systematic and targeted capacity building** for civil society organisations and social partners. This should include:

- **Earmarked resources** for participation and capacity development
- Support for both **technical expertise and organisational capacity** for civil society organisations, social partners, as well as officials having to implement the partnership principle
- Mechanisms enabling partners to participate as **competent and equal actors**
- **Capacity-building for public authorities, with EU Delegations/ EC Representations taking a proactive role** in capacity building and monitoring implementation of partnership.

This is essential to ensure meaningful participation, particularly in contexts with restricted civic space or limited institutional capacity. Capacity-building measures should be designed in cooperation with partners and reflect identified needs at national and regional levels.

5.7 Enhance Inclusiveness and Representativeness of Partnerships

The Commission should introduce reinforced requirements to ensure **inclusive and representative participation**, including:

- Transparent and open selection procedures for partners
- Active inclusion of underrepresented and marginalised groups
- Use of intermediary structures and networks to broaden outreach

This would contribute to strengthening the **legitimacy, accountability and quality** of EU-funded interventions.

5.8 Extend Partnership Requirements to Direct Management and EU-Level Governance

To ensure coherence across funding modes, the Commission should:

- Introduce partnership-related provisions in centrally managed programmes, including Monitoring Committees provisions for the stakeholder involved in the implementation of the programmes, with the possibility of electing a partners' representatives alongside Member States
- Strengthen structured dialogue with EU-level stakeholders involved in monitoring the different EU funds
- Promote alignment between shared and direct management approaches

This would ensure that partnership is consistently applied across all stages of EU policy implementation.

5.9 Strengthen EU-Level Structured Dialogue

The Commission should reinforce structured dialogue with civil society at EU level by:

- clarifying and strengthening the role of existing platforms,
- ensuring consistency across governance mechanisms,
- establishing regular and transparent feedback loops into policy-making²⁷.

This would improve coherence between EU-level dialogue and country-level implementation.

²⁷ ensure a regular dialogue with civil society and member States on the implementation of the COMMISSION RECOMMENDATION on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes C/2023/8627 final.

Conclusions

06

Partnership is not optional; it is rooted in EU Treaty principles and international commitments, including engagement with civil society as a core element of democratic governance and sustainable development.

However, current experience demonstrates that **legal recognition across MFF funds is highly needed**. In the absence of clear standards, transparency requirements and accountability mechanisms, implementation remains uneven, often limited to consultation rather than meaningful participation.

Strengthening the partnership principle as a **horizontal requirement in the next Multiannual Financial Framework** is therefore essential to ensure:

- consistent application across funding instruments,
- improved quality and impact of EU investments,
- enhanced transparency and accountability, and
- stronger democratic ownership of EU policies.

Achieving this will require not only legal and procedural changes, but also **long-term investment in institutional capacity, political commitment and administrative culture**. Moving from formal compliance to **structured, well-resourced and meaningful partnership** should be a central objective of the next generation of EU funding programmes.

The Three Pillars of Partnerships

Well-structured, Well-resourced and Meaningful Partnership



Image generated with Bankwatch Claude AI

Annex


07

Table of good practices

Area	Legal Requirements (CPR / Code of Conduct)	Good Practices (Beyond Compliance)
<p>Meaningful consultation of partners and citizens</p>	<ul style="list-style-type: none"> - Consultation required in preparation of Partnership Agreements and programmes (CoCP Art. 5) - Access to information and opportunity to provide input 	<ul style="list-style-type: none"> - Early, proactive and continuous engagement (not one-off consultations) - Use of diverse methods: questionnaires, working groups, public consultations, seminars (BE, DE, PT, EE, ES, CY, IT) - Targeted consultations on specific funds (FR, SL, PL) - Continuous consultation processes (EE) - Accessible information platforms (GR) - Permanent information structures (e.g. JT info centres in SI)
<p>Framework for participation</p>	<ul style="list-style-type: none"> - Obligation to organise partnership - use of Technical Assistance for support (CPR Arts. 36–37) 	<ul style="list-style-type: none"> - National partnership strategies and guidance (PL, PT) - Dedicated structures (e.g. partnership sub-committees in PL) - Systematic needs assessment and long-term planning (PT) - Dedicated working groups on partnership (PL)

<p>Selection and representativeness of partners</p>	<ul style="list-style-type: none"> - Transparent and representative selection required (CoCP) 	<ul style="list-style-type: none"> - Expansion beyond minimum partner categories - Targeted inclusion of underrepresented groups (EE – youth, NGOs, rights organisations) - Use of networks to broaden outreach (IE) - Recognition of self-organised civil society structures (HU)
<p>Monitoring Committees (MCs)</p>	<ul style="list-style-type: none"> - Mandatory establishment of MCs (CPR Arts. 38–39) - At least one meeting per year - Partner participation required 	<ul style="list-style-type: none"> - Flexible and innovative MC structures (single vs multi-level systems: EE, PL) - JTF-specific sub-committees / working groups (PL, CZ, RO, SK) - Inclusive composition (EE – < 50% government) - Frequent meetings and extended consultation timelines (PL) - Stronger role in decision-making (not only advisory)
<p>Functioning of Monitoring Committees</p>	<ul style="list-style-type: none"> - Basic procedural rules (e.g. notice period ~10 working days, CoCP Art. 11) 	<ul style="list-style-type: none"> - Longer deadlines for documents and consultation (PL) - High frequency of meetings (up to 10/year in PL) - Mechanisms allowing consultation beyond MC members

Capacity building of partners	<ul style="list-style-type: none"> - Technical Assistance should support partnership and capacity building 	<ul style="list-style-type: none"> - Dedicated national capacity-building strategies (PT, PL) - Civil society involvement in defining capacity-building needs (LV) - Financial compensation for participation (HU) - TA-funded support projects for MC members (PL, CZ, SK)
Use of civil society expertise	<ul style="list-style-type: none"> - Partners should be involved in implementation and monitoring 	<ul style="list-style-type: none"> - Active integration of CSO expertise in decision-making - Improving selection criteria and programme quality (SK, PL, HU) - Development of thematic guidance (e.g. DNSH working groups in PL)
Transparency and access to information	<ul style="list-style-type: none"> - Obligation to ensure access to relevant information 	<ul style="list-style-type: none"> - Centralised, user-friendly information repositories (GR) - Continuous communication platforms and info centres (SI)
Governance approach (multi-level & bottom-up)	<ul style="list-style-type: none"> - Partnership principle implies multi-level governance 	<ul style="list-style-type: none"> - Strong vertical integration (national, regional, local actors) - Bottom-up engagement mechanisms embedded in all stages - Use of networks and intermediaries to reach grassroots actors



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