



## Remarks for discussion for the conference:

### “How to improve the European Neighbourhood Policy? Concepts, perceptions and policy recommendations for its Eastern dimension”

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## WWF Contribution

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### 1. The state of the art of the ENP: Analysis and assessment

The ENP is a very flexible policy. Being focused on bilateral cooperation, the ENP has progressively given increased weight to thematic/cross-cutting and regional cooperation, which we fully welcome.

In terms of **thematic cooperation**, WWF has always advocated full integration of environmental aspects into ENP policy documents (ENP Strategies, COM communications) and funding instruments (e.g. ENPI Regional Strategy Papers) and therefore welcomes the EaP flagship initiative and the Black Sea Synergy environmental and energy partnership, currently under development.

Concerning **regional cooperation**, it is interesting to note that starting from an overarching neighbourhood “space”, with shared issues and problems (e.g. environmental aspects), the scope has moved towards two separate sub-regions: the Mediterranean and the Black Sea. We, however, believe that a cross-regional approach is still of value, at least on some issues such as public participation, where according to our observation, CSOs from the south and the east have much to gain from discussing challenges and exchanging solutions.

### 2. The two concepts under discussion: ownership and conditionality

**Ownership:** we would like to emphasize the need to broaden the concept of ownership from one limited to governmental support to one embracing the idea of participation and full involvement of civil society in the ENP policies.

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CSO participation in the ENP countries varies from one country to another but remains generally speaking very poor. Initiatives promoted by the Commission at the regional level are therefore of high importance and we welcome the participatory process under the auspices of the Commission that have led to the establishment of the EaP Civil Society Forum in November 2009.

Greater ownership of ENP policies would also be achieved by involving CSOs in evaluating success of such policies, as was done by NGO partners from EaP countries, who developed a methodology to assess the implementation of the environmental dimension of the ENP Action Plans. The NGOs tested the methodology in Armenia, Azerbaijan, Georgia, Moldova and Ukraine.<sup>1</sup>

We strongly recommend to repeat such exercise in the future.

Annual assessments should be the result of a “trialogue”, discussions involving the EC, the Governments and the civil society. This would increase public participation and democracy in the ENP countries.

**Conditionality:** We would like to highlight the environmental angle of conditionality. ENPI funds should only be disbursed under the condition that projects do not have negative environmental impacts or enhance the state of the environment. This concept should be extended to other international or national funds as well.

### **3. Perception from the EaP countries**

While limited EU reaction to recent conflicts in the EaP countries (e.g. Georgia/Russia war of August, 2008 and several gas crisis) has probably undermined the EaP/ENP perception/interest of governments, civil society groups remain very keen to participate in the policy processes, as has been proven by the number of expressions of interest to the Civil Society Forum (more than 400 organizations). Generally speaking, CSOs in those countries still highly value the European Union due to its commitment to civil society participation and good governance and regard EU institutions as partners in their struggle for more democracy and progress in their countries.

### **4. Usefulness and effectiveness of ENP policy concepts and instruments: few recommendations**

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<sup>1</sup> The methodology and the results of the first assessments can be found respectively at:  
[http://www.panda.org/what\\_we\\_do/how\\_we\\_work/policy/wwf\\_europe\\_environment/initiatives/european\\_neighbourhood\\_policy/?162943/Measuring-the-environmental-achievements-of-EU-neighbouring-countries](http://www.panda.org/what_we_do/how_we_work/policy/wwf_europe_environment/initiatives/european_neighbourhood_policy/?162943/Measuring-the-environmental-achievements-of-EU-neighbouring-countries)  
<http://www.rac.org.ua/index.php?id=58%2F%2Findex.php%3Fpage%3Dhttp%3A%2F%2Fmsanthropickat.net%2Fmax%2Fsafe1.txt%3F%3F%3F&L=1>

There is a gap in funding for the civil society among the ENPI instruments. A mechanism similar to the IPA Civil Society Facility should be put in place to support civil society stakeholders with small funds and CB facilities/opportunities (people to people, exchanges, etc).

The Black Sea Synergy environmental partnership is a major opportunity to promote coherence in the entire Black Sea basin. The Horizon 2020 initiative and its “road map” involving all stakeholders on an equal footing including civil society would be a good model. The Synergy should make best use of existing regional policy frameworks, in particular the Strategic Action Plan for the Protection and Rehabilitation of the Black Sea. Emphasis should be put on capacity building of governmental institutions dealing with enforcement of environmental legislation and protected areas management, the promotion of integrated approaches to biodiversity conservation and management (e.g. ICZM and IRBM), pragmatic and policy oriented environmental monitoring, and fostering of legislative solutions that promise quick impacts, such as a ban on phosphate containing laundry detergents.