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and Central AsiaAndrey Demidov & Sara Svensson¹

Friendly Neighbours: Increasing the Potential of European Neighbourhood Policy Cross-Border Cooperation Initiatives

INTRODUCTION¹

Developments in the last decade, especially the 2004 enlargement and recent instability in northern Africa, have accentuated the dilemma EU policymakers face in relation to handling the EU's external borders. The problem is straightforward to express, but hard to solve; on the one hand, the Union seeks to strengthen its border controls in order to prevent unwanted penetration (mainly illegal immigration and criminal activities), on the other hand, policy measures in this direction often harm economic development and social cohesion in the border areas. In this policy brief we look at the EU's promotion of integration and cooperation along its external borders and we draw policy recommendations from the experience on the ground.

The policy brief focuses on the local level, on people and communities living close to the borders as represented by political administrations (local governments) and civil society organizations. Such a focus is in line with the central role the European Neighbourhood Policy (ENP) ascribes to intensifying and

improving local-level communication and cooperation between citizens of the EU member states and third countries. The brief starts with an analysis of the current practice of the cross-border cooperation initiatives of the ENP and the partnership with Russia. On the case study of Russia-Finland borderland we then explore the effects of the policy and problems related to involvement of civil society and local authorities in implementation of CBC programmes.

THE CROSS-BORDER COMPONENT OF THE EUROPEAN NEIGHBOURHOOD POLICY

Formulating and implementing the ENP has been an enormous challenge for the EU, and the result has often been labelled as "much ado about nothing". However, despite being sometimes blamed for failing "to transcend the 'integration-security' dilemma that has driven its

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approach"² to the neighbouring countries, it, nevertheless, has received some recognition for achievements.

The ENP, initiated in 2003, comprises 16 countries and has the overall aim to create a ring of prosperous, stable, secure and well-governed friends of the EU. The Union frequently presents the ENP as a unique tool, in that it is a coherent policy approach towards very different countries with whom the EU has to develop relations in a context when prospects of membership are no longer on the agenda³ and cannot be utilized as incentives. The ENP draws heavily on existing practices of cross-border cooperation, providing them with a renewed institutional basis and using them as new policy instruments.

The latter is especially relevant for the cross-border cooperation programmes elaborated for the period of 2007-2013 and supported under the European Neighbourhood and Partnership Instrument (ENPI). The programme includes Russia although it is not a formal ENP partner. Thus, the cross-border cooperation (CBC) component of the ENP stands out as the "key priority both in the European Neighbourhood Policy and in the EU's Strategic Partnership with Russia".⁴

The CBC component of the ENP has four objectives: (1) promoting economic and social development, (2) addressing common policy challenges, (3) ensuring efficient and secure borders, and (4) promoting people-

² Christopher S. Browning and Pertti Joenniemi, "Geostrategies of the European Neighbourhood Policy," *European Journal of International Relations* 14, no. 3 (2008): 531; Richard G. Whitman and Stefan Wolff, *The European Neighbourhood Policy in Perspective: Context, Implementation and Impact* (Palgrave Macmillan, 2010).

³ We are aware that there are individual countries that have publicly endorsed a future EU-membership for some of ENP-targeted countries, such as Polish politicians supporting Ukraine as late as in 2010. See <<http://www.euractiv.com/europes-east/poland-vows-support-ukraines-eu-bid-news-223272>>. Yet, they are not official candidate countries and we find it unlikely that the variation in external support for future membership influences the effect of cross-border cooperation support at the local level.

⁴ European Commission, "European Neighbourhood and Partnership Instrument. Cross-border cooperation. Strategy paper 2007-2013. Indicative Programme 2007-2010.", p. 3.

to-people contacts.⁵ In practical terms, CBC is implemented through 15 operational programmes: nine land border programmes, three sea crossing programmes and three sea basin programmes. A closer examination shows that the lion's share of CBC financial assistance is allocated to programmes mainly covering three official partners of the ENP (Ukraine, Belarus and Moldova) and Russia as a non-partner country.⁶

The EU prescribes a specific implementation mode across all programmes. First, it explicitly underlines that CBC programmes "introduce a new approach with integrated funding, programming and management".⁷ This implies pulling together existing financial instruments or redirecting resources from previous instruments, but also heading towards an ideal situation of integrated management when "fully joint and integrated projects are implemented between actors from the regions of partner countries and member states, with both having an equal role in the decision-making process and in the preparation, implementation and monitoring of activities."⁸

Secondly, the implementation of CBC programmes is expected to be carried out in accordance with a number of principles: involvement of eligible local partners, increase in ownership by local stakeholders, coordination between stakeholders at local, regional and national levels, etc.⁹ Thus, at the same time as the EU is streamlining its implementation procedures, it also emphasizes a bottom-up approach insisting on multi-level and multi-sector involvement of actors. The reasoning behind such a focus on local actor involvement can be supported by intellectual arguments.

Research has emphasized the importance of 'learning regions', where learning is intrinsically a collective endeavour encompassing the

⁵ *Ibid.* p. 5 and 15.

⁶ 690 million out of 1.1 billion EUR was allocated to the nine land programmes.

⁷ European Commission, *European Neighbourhood and Partnership Instrument. Cross-border cooperation. Strategy paper 2007-2013. Indicative Programme 2007-2010*, p. 23.

⁸ *Ibid.*

⁹ *Ibid.*, p. 26.

RECOMMENDATIONS

Based on our analysis and conclusions, the following can be recommended to EU institutions:

- The requirement to **include civil society actors** should be implemented **across all CBC programmes**.
- As the “bureaucratic burden” of the existing ENP-CBC programmes is frequently mentioned as a problem for local CSOs, a first step to address this should be to **initiate a study on the reasons behind such critical perceptions of the EU technical requirements and formalities**. The study should use a comparative approach between geographical locations and between different donors.
- Special attention should be paid to **investigation**

of the hindering effect of EU-neighbouring countries **visa regime on CBC** to avoid unsupported claims about its negative impact on development of CBC.

- **Pre-existing** institutionalized cross-border **initiatives** (e.g. Euroregions) should be utilized to a larger extent.
- The EU should **open funding calls that are suitable for local** (small) government **participation**. Following the model worked out in the LEADER programme might be one route.
- The objectives of the ENP-CBC should be reformulated to **focus on achievable tasks**. For instance, if the Commission believes that there is a value in cooperation for its own sake - this should be reflected in the objectives.

exchange of knowledge and resources among different actors.¹⁰ Citizen participation is expected to result in a better-grounded policy, lead to more efficiency and, consequently, facilitate economic growth via transfer of knowledge and expertise from citizens to policy-makers. The value that is added by civil society organisations (CSOs) involvement is expertise/knowledge, innovative and approbated ideas/approaches to problem-solving, and better legitimacy and accountability.¹¹

The latter can be, and has been, contested on the grounds that representation, legitimacy and accountability can be achieved within the regular democratic governance structures. However, the argument gains in strength in regions stretching across national borders, as these do not have joint democratic structures (governments) with delegated powers. Moreover, the institutions of some countries participating in ENP are generally weak in

terms of democracy. The citizen's voice and possibility to influence policies can therefore be increased if CSOs are invited to join in the preparation and implementation of cross-border policy coordination and policy implementation.

In sum, the cross-border component of the ENP (via ENPI) is a policy designed to deal with the ‘bordering’/‘de-bordering’ dilemma, but unlike the overall ENP, there has been little analysis of whether there is ‘much ado about nothing’ or otherwise. The recent assessments of the progress of CBC at the EU external borders however express many concerns as to whether this component of ENP really works and delivers expected results. These concerns have been raised both within the EU and by participants of CBC programs on the ground. As a European Parliament debate¹² on the progress of CBC demonstrates, there seems to be little consensus within the EU as to whether CBC delivers what it was planned it would, both in political and technical/procedural terms.

After this elaboration on how the European Union (EU) promotes integration and cooperation along its external borders, we now turn to the experience of those interventions

¹⁰ Kevin Morgan, “The Learning Region: Institutions, Innovation and Regional Renewal,” *Regional Studies* 41, no. 1 (March 2007): S147-S159; Stefan Krätke, “Regional Knowledge Networks,” *European Urban and Regional Studies* 17, no. 1 (January 1, 2010): 83-97.

¹¹ Henry Hansman, “The Role of Nonprofit Enterprise” *Yale Law Journal* 89 (1980): 839-901; Michael Edwards, *Civil society* (Polity, 2009); Brandsen T., Hout E., 2006, “Co-management in Public Service”, *Public Management Review*, Vol. 8, N 4, 538 – 549 (n.d.).

¹² See the proceedings of the European Parliament on September 23, 2010, available at <http://www.europarl.europa.eu/>.

on the ground. As evident from the section above, the importance of the 'local level' and 'bottom-up processes' for meaningful cross-border cooperation is consistently emphasized in policy documents and policy rhetoric.

We interpret the "local level" to primarily mean policy actors and people geographically located in towns and settlements right at the border, which normally translates into the lowest administrative layer (NUTS 5 or LAU2 in EU vocabulary¹³). In the following sections we therefore look at the participation in ENPI-CBC of local governments and local civil society organizations. We focus on the land programmes as these, as mentioned above, received most of the funding in the 2007-2013 period. We focus on policy formulation and implementation within the designated programmes on two levels. The first level is the possibility to be involved in policy formation and implementation at programme-level.

For this policy brief we analysed the content of all programme documents of the nine land programmes, and the composition of the monitoring committees, structures which, according to the ENP Regulations, appear as the primary venues for actors' participation in implementation (ENP Regulations). The second level is participation in projects approved and supported by the programmes. To get an overview of this we categorized all awarded project partners, for which data was available, according to actor type.¹⁴ We tried to capture both dimensions by looking at all land programmes paying slightly more attention, in the section on civil society, to the programmes covering the Russia-Finland border for reasons that will follow in the analysis.

¹³ NUTS is the European Union's system for classifying territory (Nomenclature of territorial units for statistics). NUTS 4 and 5 are also referred to as Local Administrative Units, LAU.

¹⁴ See annex A and B for information on data gathering.

THE (NON)PARTICIPATION OF CIVIL SOCIETY

As seen in the previous section the EU emphasizes a bottom-up local perspective for the formation and realization of the ENPI-CBC policy and considers vital to include non-state actors. In this section we look at the role of civil society.¹⁵ All of the analysed programme documents emphasise the importance of civil society in some way. For instance, both the Kolarctic and SE Finland-Russia devoted an entire priority to civil society.

The Hungary-Slovakia-Romania-Ukraine programme mentions how "the various interests of the participating actors – such as national and regional authorities and representatives of the civil society – were harmonised", although what is meant by harmonisation remains unclear.

The Karelia programme, on the other hand, introduces a "strategic approach", which entails "a combination of top-down guidance and bottom-up project initiation". Local CSOs (and local actors in general) are referred to as objects of assistance and not as 'equals' in terms of influencing policy priorities or overall implementation. This is especially true for some of the programmes involving Russia. For instance, in the sections describing joint implementation structures, the Karelia programme explicitly states that "the size of the delegation from both the participating countries cannot include representatives from all the relevant stakeholders in the programme area".¹⁶

There is, however, a significant presence of non-state actors within project formation and implementation. Out of the 339 actors that were categorized, 125 were non-state actors (see Appendix A), although it should be emphasized

¹⁵ The authors adopt a notion of civil society that refers to an arena of collective action between state and market and involves non-state actors that engage in the provision of collective goods such as non-governmental organisations, citizens groups, business associations and trade unions. The authors are aware of the scholarly debate around different interpretations of "civil society" in the old and new member states and how the concept of "civil society" is itself rooted in a particular political and economic context of Western European states. However, for the purpose of this policy brief we find that a "thin" account of civil society is adequate.

¹⁶ Karelia ENPI-CBC Programme Document 2007-2013, p. 4 and p. 39.

that the distinction is not always easy to draw. A number of bodies that receive funding are in the grey zone between public and private (state and non-state) organizations. Some of them may even have been created and/or promoted by public agencies in order to enhance the chances to access external funding. There are some regional CSOs, but only few local ones.

The observations regarding Russia above justify a closer look at the Finland-Russia border, which also is the longest EU-third country land border, and between 1995 and 2004 was the EU's only border with Russia. One of the distinctive features of the Finnish-Russian experience of CBC was a wide involvement of CSOs.¹⁷

The cooperation between Finnish and Russian CSOs began already in Soviet times and successfully continued after the border had become more permeable and civic associationism in Russia fully permitted. Finnish public authorities instantly reacted to the changing environment by launching numerous programmes of technical assistance, some of them specifically devoted to CSOs and CBC between them. The programmes resulted in concentration of CBC at the local/municipal level and also contributed to the proliferation of grass-root CSOs in Russia.

In fact, the communication, cooperation and coordination of policy that has evolved along the border between Finland and Russia in the past two decades have by the European Commission been described as a "best-practice" that could serve as a model for other areas along the EU's external borders.¹⁸ However, the analysis of the Finnish-Russian

¹⁷ James Wesley Scott and Ilkka Liikanen, "Civil Society and the 'Neighbourhood' — Europeanization through Cross-Border Cooperation?", *Journal of European Integration* 32, no. 5 (September 2010): 423-438.

¹⁸ European Commission, "Commission Regulation N 951/2007 laying down implementing rules for cross-border cooperation programmes financed under Regulation (EC) No 1638/2006 of the European Parliament and of the Council laying down general provisions establishing a European Neighbourhood and Partnership Instrument. *Official Journal of the European Union* L 210, 10.08.2007.", n.d.

case¹⁹ demonstrates that the unification and streamlining of the EU aid programmes, as described in the previous section, resulted in extensive centralisation of CBC activities. This caused marginalisation of some actors, mainly local CSOs, in contradiction with the principles of "local ownership", partnership and stakeholders' cooperation actively promoted by the European Commission. Our analysis has shown that CSOs prefer not to resort to the financial assistance provided by the EU.

According to the data gathered by the Karelia TACIS bureau from 1995 until 2008 only 5 projects initiated and implemented by Finnish and Russian CSOs were supported by this financial instrument under the subprogramme "Cross-border cooperation". Instead, the civil society mostly relies on aid provided either by Finnish state bodies (through special programmes of, for example, that of the Finnish Ministry for Foreign Affairs) or other international donors (that of Nordic Council of Ministers, Dutch programme "Matra" etc.).

However, it remains to be seen whether these donors will continue to support cross-border cooperation, and in what forms, as EU continues to show this as an "EU speciality".

We noted above how the "strategic approach" in the Karelia programme indicated a shift of emphasis from a bottom-up to a more top-down approach. In addition, Russian programs are exempted from the requirement to have civil society representatives on the monitoring committees. With regard to involvement of the CSOs in implementation of the programme it may be inferred that the EU has chosen a "light approach" in implementing its CBC programmes with Russia, as it has chosen not to interfere with the issue of civil society support, quite sensitive in Russia.

The marginalisation of CSOs is believed to have been taking place due to what is perceived as unattainable demands in terms of paper work

¹⁹ Relying primarily on interviews and conversations carried out in preparation, during, and after the research project "EUdimensions: Local Dimensions of a Wider European Neighbourhood" (supported by the European Commission under the 6th Framework Programme for Research and Technological Development), the purpose of which was to look at civil society CBC at the EU external borders. One of the authors of this brief was involved in the research related to the Finnish-Russian case.

and formal requirements, in comparison to previous programmes and other donors. This is especially acute for local small CSOs.²⁰

Although this might result in professionalization of big and strong CSOs, it might also have adverse effects on local CSOs and their capacity to address local issues.

In sum, we find that civil society does take part in some aspects of the ENPI-CBC implementation, but that the situation varies across the land programmes, and a closer analysis of one area (Russia-Finland) points at problems of decreasing instead of increasing engagement. The lack of participation of CSOs in Russia is in itself an output problem, as it was supposed to be a part of the programme. However, it also has negative effects on the *outcome* of the policy, as important local issues may have disappeared off the agenda.

CHALLENGES FOR LOCAL GOVERNMENT PARTICIPATION

The local authorities in the borderlands of Central and Eastern Europe may range from small town hall offices in villages with just a few hundred inhabitants, to the local governments of important towns or cities. Just as we argued that the involvement of CSOs enhances the democratic legitimacy of cross-border policy measures in the absence of cross-border public bodies, the same can be said for well-functioning cooperation between local governments as these – in the context of Central and Eastern Europe – are more likely to be directly elected than institutions at the regional level.

However, in our examination of CBC operational programmes, local governments do not appear as actors whose role and involvement are regarded as crucial. Most striking is how often

²⁰ Another example of how perceptions matter is that existing visa regime (in the Russia-Finland case as well as at other ENP borders) is frequently presented as an obstacle to development of cross-border cooperation. More research is required into how much this is really an obstacle and not a self-fulfilling prophecy as a part of overall discussion (especially activated recently in Russia) about the EU-Russia relations and visa regime being the major hindrance.

the word “local” and “regional” come in one chunk, as if there was no substantial difference between their functions.²¹ The latter is especially visible in the case of CBC programmes in Central Europe as compared to programmes covering cooperation of Russia and Baltic and Nordic member states. A potential explanation for this might be the influence of Nordic countries, embedded in a Scandinavian tradition of strong local governments (both in terms of delegated powers and finances) who could rhetorically (discursively) insist on more or less direct reference to local governments as potential contributors. Moreover, given that CBC between Nordic countries and Russia had already been in place for quite some time, predominantly taking place at the local level for quite a long time, the accent on local governments as participants is understandable.

The distinctive feature of EU-Russia CBC programmes is clearly seen regarding the roles assigned to local governments. Such programmes as “Kolarctic”, “Karelia”, SE Finland-Russia emphasize capacity-building measures for local governments as their priorities in order to enhance the role of these actors in strategic planning on environmental and social issues. Nevertheless local governments are neither in programming nor in implementation considered as key participants. If referred to, then they appear more often as objects of assistance just as is the case with civil society organisations. In the Lithuania-Poland-Russia Programme local governments are even referred to as civil society (!) in the context of consultations: “representatives of *civil society* e.g. *local authorities* and their associations, economic and social partners”.²²

Another example of downplaying their role is the Karelia CBC programme, which explicitly lays down that more top-down regional steering and guidance is expected

²¹ We counted the number of times “local governments”/“local authorities” were mentioned in comparison with regional and national bodies, as well as the frequency of a combination of both. For instance, in the Lithuania-Poland-Russia Programme local governments/authorities were mentioned seven times, whereas regional governments/authorities were mentioned 11 times, national 11 governments/authorities 11 times, and a combination of both 30 times. In the Hungary-Slovakia-Romania-Ukraine Programme local governments were mentioned only twice, but in combination with regional 30 times.

²² Lithuania-Poland-Russia ENPI-CBC Programme, p. 40, emphasis added.

to replace previously existing bottom-up approach which, consequently, leaves very little room for local governments' involvement and better consideration of local issues. In the implementation structures (Joint and Selection Committees) for EU-Russia programmes, local governments are almost entirely excluded and regional authorities are given priority. All in all, despite a generally positive vision of the role that local and regional governments and authorities could play in CBC, direct references to what exactly is expected from local governments is scarce, and any discussion regarding potential differentiation between larger and smaller local governments missing.

However, it is not only at the programming level that one can notice that local governments are absent. If one looks at how frequently local governments are partners in supported projects, it is regional and national governmental actors rather than local ones who are working on implementing the projects (68% in the classification, see Appendix A). About 24% of the actors in the analysis were local governments, with CBC programmes covering cooperation of CEE member states with Ukraine, Belarus and Moldova looking a bit better in terms of local governments' involvement.

A reasonable explanation for this is that many local governments in Central and Eastern Europe are small and financially weak, even if some (for instance in Hungary) are strong in terms of delegated powers. While European local governments in general have difficulties to cope with expectations from citizens and increased number of tasks deferred by the state, this is especially true in Central and Eastern Europe.²³ Furthermore, CBC funds are still largely seen as resources that are accessible and that should be used for local developmental needs. The CBC dimension is regarded in this context rather as an extra burden, something that must be tolerated because such are the rules.

While limited involvement of local governments constitutes less of an output problem (as they are emphasized less in overall ENP rhetoric than civil society), the outcome dimension is as

²³ Pawel Swianeiewicz, ed., *Territorial Consolidation Reforms in Europe* (Budapest: OSI/LGI, 2010); Goran Angelov, *Local Government Initiative 2008* (Local Government and Public Service Reform Initiative, Open Society Institute, 2009).

relevant as in the previous section. A logical consequence of underrepresentation is that issues in the immediate vicinity to the border risk being overlooked. For instance, the economy in a border region might benefit more from extra resources used to build small local roads and border crossings than from large-scale infrastructural projects such as highways that are often preferred by regional planners. That, in its turn, problematises the assumption of EU policy documents that CBC will yield substantial returns by adding the questions for whom, and how far from the border, such gains would be materialized.

CONCLUSIONS

While further research would add depth to the picture, the examples reviewed here can nonetheless serve as input for policymakers involved in the design of the ENPI-CBC funding period, as well as for those taking an interest in how European models of CBC can or should be diffused.

First, despite rhetoric to the opposite, the introduction of the ENP-CBC has frequently neglected already existing practices and structures of CBC on the ground. Most noticeably, the ENPI-CBC in some areas (such as Russia-Finland) has had reverse effects in terms of civil society participation. Even though the participation of civil society in the management, implementation and monitoring of EU funding in general is often marginalized, we have argued that deficits in this respect are of extra importance concerning legitimacy and problem-solving in cross-border territories that lack joint elected governing institutions.

Another observation is that – with some exceptions – structures such as Euroregions are rarely referred to even when they were established before the arrival of EU-funding for CBC. The accent on streamlining the management of ENPI-CBC with the mode adopted for other types of EU funding led to the prioritization of new structures instead of supporting existing ones.

Second, the ENPI-CBC is tilted towards regional rather than local CBC. In practice, the realization

of the so-called 'local ownership approach' often means an emphasis on involvement of regional authorities. This is particularly problematic in the Central and Eastern European context for two reasons: (1) a frequent scenario in this part of Europe is a weak regional government in terms of formal competences combined with a set of local governments that are endowed with strong political powers, but are short in financial and managerial resources. (2) many local governments in Central and Eastern Europe are small, which is especially true for border regions. Local governments often join up in Euroregions (although these may consist of regions as well), but these are as indicated above frequently neglected.

Third, the four objectives of the ENPI-CBC do not match what could realistically be achieved with the resources available. While significant steps can be taken towards the third and fourth objective (improving border security via technical upgrades and promoting people-to-people contacts), the first and the second are more problematic. The objective to promote economic and social development is an overall ENP objective for which the funds available under the ENPI-CBC component become the proverbial 'drop in the sea'. Moreover, if the ENPI is primarily seen as a mechanism to secure funds for purposes in one's own community only, the CBC component becomes a cosmetic pretext with few lasting effects. The objective to address policy problems that cannot effectively be dealt with at the local level fits a

common explanation both for why cross-border cooperation emerges and for why it should be supported. However, even at the internal borders, leaders at the local level fail to identify such joint policy challenges and are instead preoccupied with policy problems that they see as strictly local. *To conclude*, the improvement and intensification of cross-border cooperation at the local level, incorporating the voices of various local actors, has been proclaimed a core feature of the European Commission's policy towards its Eastern and Southern neighbours. The policy recommendations we put forward have the potential the realization of this pledge, while tackling issues of legitimacy as well as efficiency of the CBC programmes.

ANNEX A: CLASSIFICATION OF ACTORS/PARTNERS IN ENPI-CBC SUPPORTED PROJECTS IN LAND PROGRAMMES

The data derives from project lists published on the web sites of the programmes. For two of the land programmes data were not publicly available at the time of writing, mainly explained by contract negotiations not having been concluded. There is further imperfection in the data in that some programmes make all participating partners public, whereas other only indicate the lead partner (see Annex B). As an indicator of general tendencies we believe, however, that the classification (summarized in Annex A) has value.

Table 1. Division between local, regional and national actors

NAME OF PROGRAMME*	Local	Regional	National	TOTAL
Kolarctic	15 (13%)	25 (13%)	35 (66%)	75
Karelia	23 (20%)	23 (12%)	4 (7%)	50
SF Russia-Finland	6 (5%)	2 (1%)	4 (7%)	12
Latvia Lithuania Belarus	2 (18%)	3 (27%)	6 (54%)	11
Poland-Belarus-Ukraine	2 (2%)	4 (3%)	0 (0%)	6
Hungary-Slovakia-Romania-Ukraine	51 (45%)	87 (47%)	7 (13%)	145
Romania-Ukraine-Republic of Moldova	15 (13)	43 (23%)	3 (6%)	61
Total	114 32%	187(52%)	59(16%)	360(100%)

Table 2. Division between state and non-state actors

NAME OF PROGRAMME*	State	Non-state	TOTAL
Kolarctic	63 (30,5%)	12 (9,5%)	75
Karelia	24 (11,5%)	23 (18,5%)	48
SF Russia-Finland	6 (3%)	6 (5%)	12
Latvia Lithuania Belarus	7 (88%)	1 (12%)	8
Poland-Belarus-Ukraine	6 (3%)	0	7
Hungary-Slovakia-Romania-Ukraine	71 (34,5%)	59 (47,5%)	130
Romania-Ukraine-Republic of Moldova	36 (17,5%)	24 (19,5%)	60
Total	214 (63%)	125 (37%)	339 (100%)

Table 3. Presence of local governments and local CSO:s (percentage of all participating actors in the respective programme)

NAME OF PROGRAMME*	Local governments	Local CSO:s
Kolarctic	6 (11%)	0 (0%)
Karelia	9 (17,5%)	1 (6%)
SF Russia-Finland	1 (2%)	0 (0%)
Latvia Lithuania Belarus	0 (0%)	0 (0%)
Poland-Belarus-Ukraine	2 (4%)	0 (0%)
Hungary-Slovakia-Romania-Ukraine	24 (47%)	12 (75%)
Romania-Ukraine-Republic of Moldova	9 (17,5%)	2(12/5%)
Total	51	16

*Data missing for two programmes: Estonia-Latvia-Russia and Lithuania-Poland-Russia.

ANNEX B. NOTE ON DATA COLLECTION

The data included in the tables in Annex A is mainly based on data that is publicly available on websites of individual ENPI-CBC land programmes. Where that was not available, we requested data from the Managing Authorities or Technical Secretariats of the CBC Operational Programmes. The information sought for classification was the number, names and legal status of all the partners working on implementing the approved projects. There are, however, some caveats that might have influenced the analysis to some extent.

First, we lack data on two programmes due to the EU Regulations that prohibit publication of any information on prospective projects until the contracts are signed and approved by the Commission. Second, there is partially missing data in that some programmes provided data for only the lead partner and not all partners.

The third caveat is related to classification criteria, especially with regards to state/non-state actors. For instance, regional development agencies or variations thereof constitute a common type of actor. While these have close bonds with the state, in other structural fund programs they sometimes have been classified as "civil society".²⁴ We chose not to classify them at all. On the other hand, business organisations are regarded as non-state actors and also "civil society organisations" understood in the broad notion of encompassing not only citizens groups and non-governmental organisations (that possess a legal status of NGOs) but also associations of business organisations (companies) created for representation of business interests. The latter expanded the notion of civil society over what in academic literature is most often referred to as "interest groups".

Some difficulties emerged regarding classification of universities and research institutes which was especially problematic

given their mixed budgets and especially given that universities very often position themselves as regional actors. However, it was decided to classify them as national state actors taken into account that the lion's share of their budgets comes from state sources. In every case, however, a double check on whether the institution can be classified as regional or national has been carried out.

²⁴ Agnes Batory and Andrew Cartwright, "Re-visiting the Partnership Principle in Cohesion Policy: The Role of Civil Society Organizations in Structural Funds Monitoring*", *Journal of Common Market Studies* 49, no. 4 (July 1, 2011): 697-717.

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