

## Corruption and the European Neighbourhood Policy (ENP)

### Query:

*“Are there anti-corruption elements inherent in the policy design and/or in the accession agreements for neighbouring states to the European Neighbourhood Policy? How does the Commission ensure that funds given to countries under this policy instrument are not corrupted? What are the experiences with corruption in the European Neighbourhood Policy so far? As neighbouring countries have received money through this instrument since 2004, are cases of corruption known? And, if so, how did the Commission react?”*

### Purpose:

“This question is for research purposes. I would like to scrutinize in how far European development cooperation is aware of the problem of corruption and how the EU is dealing with it.”

### Content:

- Part 1: The ENP as a Policy Tool against Corruption
- Part 2: Fighting Corruption in the ENP Partnership Instrument (ENPI)
- Part 3: Further reading

### Summary:

The fight against corruption figures high on the agenda of the European Neighbourhood Policy, with all ENP reference documents including the fight against fraud, corruption and organised crime as part of the reforms partner countries must commit to in their ENP action plans. The two major weaknesses of the ENP as a policy instrument against corruption include the lack of corruption monitoring and benchmarking and insufficient involvement of civil society in the process. No specific anti-corruption mechanism has been put into place to ensure that EC assistance under the ENPI is protected from corruption. As the Commission relies on the regular EU anti-corruption policies and procedures in this matter, ENP funds face similar challenges of transparency and accountability to other EU funds. No public documentation of corruption cases within ENP funds has been unearthed within the time frame of this query.

### Background:

The European Neighbourhood Policy (ENP) was developed in 2004, with the objective of *“avoiding the emergence of new dividing lines between the enlarged EU and its neighbours and instead strengthening the prosperity, stability and security of all concerned”* ([http://ec.europa.eu/world/enp/policy\\_en.htm](http://ec.europa.eu/world/enp/policy_en.htm)). The ENP vision is to create stability and a security area around the EU through promotion of reforms in neighbouring countries and drawing a ring of countries into further integration, but without them necessarily becoming full members of the European Union.

[www.U4.no](http://www.U4.no)

[www.transparency.org](http://www.transparency.org)

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#### Date:

3 April 2008



As part of this initiative, the European Union (EU) offers financial assistance to countries within the European Neighbourhood, in exchange for promoting democracy and human rights and liberalising their economies. The ENP does not cover countries which are in the EU accession process or those covered by the Stabilisation and Association process. It makes no promise of future EU membership, although eligible states making progress under the ENP may eventually become stronger candidates. The countries covered include Algeria, Armenia, Azerbaijan, Belarus, Egypt, Georgia, Israel, Jordan, Lebanon, Libya, Moldova, Morocco, Occupied Palestinian Territory, Syria, Tunisia, and Ukraine.

The EU typically concludes ENP Association Agreements in exchange for commitments to political, economic, trade, or human rights reform in a country. In exchange, the country may be offered tariff-free access to some or all EU markets, and financial or technical assistance. The ENP stipulates that after signing of an Association Agreement with a particular country, the EU will make a Country Report and then the two sides will agree on an Action Plan (including particular reforms, actions and also aid by the EU) for the next 3 to 5 years. To date, 12 country reports have been presented, 10 action plans adopted and two more are close to finalisation.

Since 2007, the European Neighbourhood and Partnership Instrument (ENPI) has replaced existing EU financial assistance (such as TACIS or MEDA). Its aim is to support partner countries' commitment to common values and principles with a wide range of objectives covering most aspects of the ENP. The Commission's final budget allocations for the financial period 2007-2013 commit about €12,000 millions to the ENP.

## **Part 1: ENP as a Policy Tool against Corruption**

### ***Political Commitment against Corruption***

As experienced during the EU accession process, the "carrot" of closer EU relations is arguably a powerful external factor that can boost anti-corruption reforms in ENP countries. The issue of corruption figures high on the political agenda of the European Neighbourhood Policy. All reference documents establishing and strengthening the ENP include the fight against fraud, corruption and organised crime as part of the priority reforms that partner countries must commit to in order to join the initiative. Most country reports and action plans developed as part of the accession process to the ENP mention the fight against corruption as one of these priority areas of reform.

The **ENP strategy paper** emphasised the need to build relationships with bordering countries based on *shared European values*.

(Please see: [http://www.dellbn.ec.europa.eu/en/pev/enp\\_strategy\\_paper\\_en.pdf](http://www.dellbn.ec.europa.eu/en/pev/enp_strategy_paper_en.pdf)).

As part of the values upon which enhanced relations with neighbour countries should be based, this document requires an explicit commitment to stable political institutions, guarantees for democracy, the rule of law, good governance, respect for human rights and fundamental freedoms, all values which are of direct relevance to promote transparency and accountability and combat corruption. In addition, the fight against corruption is specifically mentioned under the priorities of action intended to strengthen the commitment to these values as follows:

- Strengthening of democracy, rule of law, reform of the judiciary and the fight against corruption and organised crime;
- Respect for human rights and fundamental freedoms, including freedom of the media and expression, rights of minorities, gender equality, trade union rights and other core labour standards;
- Support for the development for civil society
- Cooperation with the International Criminal Court
- Commitments to key aspects of EU external policies such as the fight against terrorism and proliferation of weapons, as well as efforts to achieve conflict resolution.

**Country reports** developed within the framework of the ENP Strategy Paper are almost all critical of undemocratic elections, inefficient judiciaries, widespread corruption and limits to the freedoms of the media, expression and association. Most of them indicate that countries should, among other reforms, focus on effectively combating fraud and corruption. (Please see: <http://europa.eu/scadplus/leg/en/lvb/r14103.htm>). The large majority of **country action plans** that were subsequently developed by ENP partner countries include the fight against fraud and corruption in their priorities for action. (Please see for example Armenia's action plan [http://www.armeniaforeignministry.com/perspectives/061114\\_armenia\\_enp\\_ap\\_final\\_en.pdf](http://www.armeniaforeignministry.com/perspectives/061114_armenia_enp_ap_final_en.pdf))

The ENP is designed as a "positive" policy based on incentives rather than sanctions. The EU approach has primarily been to provide incentives to encourage ENP partner countries to implement their commitments.

The **European Neighbourhood and Partnership Instrument (ENPI)** clearly indicates that community assistance shall "*encourage partner countries' efforts aimed at promoting good governance*" (Please see: [http://ec.europa.eu/world/enp/pdf/com04\\_628\\_en.pdf](http://ec.europa.eu/world/enp/pdf/com04_628_en.pdf)). It further mentions that progress towards implementing agreed objectives, including on governance and reform, will be taken into account to determine the level of allocation for each country. In the programming exercise 2007-2010, the Transparency International Corruption Perception Index (CPI) is among the criteria used in establishing ENPI country allocations.

To provide further incentives for countries to implement agreed-upon objectives for governance related issues, the EC announced in December 2006 the implementation of a "**Governance Facility**", intended at providing additional support to partner countries that have made most progress in implementing the agreed upon agenda set in their action plan.

(Please see: [http://ec.europa.eu/world/enp/pdf/governance\\_facility\\_en.pdf](http://ec.europa.eu/world/enp/pdf/governance_facility_en.pdf)).

Within this framework, governance is understood in a very broad sense, covering issues of respect of human rights, rule of law, democratisation, access to independent justice, transparent and accountable government, etc. In order to identify countries benefiting from the Governance facility, ENP action plans will be assessed to measure progress made in implementing the governance agenda, including in tackling corruption. Indicators used to assess progress look at relevant legislation, institutional mechanisms in place and their effectiveness for core governance issues, including democratic practice, respect of human rights and fundamental freedoms and the rule of law<sup>1</sup>.

### ***The ENP in Practice: Monitoring and Implementation of the Anti-Corruption Commitments***

#### **Assessment of Implementation**

It is difficult to assess the degree of implementation of the ENP action plans. In December 2006, two and a half years after the EU adopted the European Neighbourhood Policy, the European Commission published a progress report, assessing level of implementation in seven countries, including Ukraine, Moldova, Israel, Jordan, the Palestinian Authority, Tunisia and Morocco. (Please see: [http://ec.europa.eu/world/enp/pdf/com06\\_726\\_en.pdf](http://ec.europa.eu/world/enp/pdf/com06_726_en.pdf)). Level of implementation of anti-corruption commitments were assessed in terms of legal or institutional steps that had been taken in the fight against corruption in countries such as Ukraine, Moldova and Jordan. This assessment seems to focus primarily on input indicators, assessing level of compliance to anti-corruption

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<sup>1</sup> The fight against corruption is one of the indicators used to assess progress in the rule of law.

regulations and procedures, rather than output indicators looking at the impact of such measures on corruption.

### Corruption Monitoring and Benchmarking

One of the major weaknesses of the ENP is the lack of "benchmarking" and adequate monitoring mechanism. Although the EU enlargement process has provided an opportunity to develop its capacity to measure corruption and anti-corruption progress, corruption benchmarking is still a relatively new preoccupation for the EU. (Please see: <http://www.csd.bg/fileSrc.php?id=2117>). The Commission is increasingly aware of the need to develop benchmarks that go beyond adherence to international standards and conventions to assess progress, but a common methodology still needs to be developed to measure performance and set appropriate benchmarks and targets. The Commission's ENP progress report itself states that governance is "*the most difficult field in which to achieve and measure progress*", given the different cultures, contexts, challenges and levels of commitment across ENP countries.

As a result, although action plans will be assessed within the framework of the Governance Facility to evaluate implementation progress, the Commission does not envisage conducting a scoring exercise, invoking the complex and multi-faceted nature of governance in ENP countries. The monitoring of implementation will primarily focus on input indicators, looking at completed reforms as well as steps taken towards such reforms. ([http://ec.europa.eu/world/enp/pdf/governance\\_facility\\_en.pdf](http://ec.europa.eu/world/enp/pdf/governance_facility_en.pdf)). Such indicators of change may be of limited value to assess effectiveness or impact of anti-corruption measures taken on levels of corruption.

On a more practical level, ENP action plans also lack concrete time tables, specific objectives and identification of financial and human resources needed to implement the agreed-upon measures. They are often formulated in rather broad terms, lacking the precision and rigour in which gaps were identified in the initial country reports prepared by the Commission. (Please see: <http://www.ugbs.org/weru/eper/no7/bosse.pdf>). Action plans' objectives, including those related to governance and the fight against corruption, are generally neither specific nor quantified and can't be easily monitored and compared. In spite of these constraints, the Commission intends to publish a full assessment of progress made by ENP partners in implementing their Action on 3 April 2007. It will include individual country Progress Reports as well as a Sectoral Progress Report.

More generally, the monitoring of governmental anti-corruption activities is only possible with measurable and quantifiable anti-corruption benchmarks. This has proved to be a challenging task as corruption is a horizontal issue and no direct "acquis communautaire" covers the fight against corruption. To overcome these challenges, the intra- and inter-sectoral anti-corruption elements could be packaged in the "acquis communautaire" and cross-examined against international anti-corruption conventions such as the UNCAC, using the related monitoring checklist developed by UNODC<sup>2</sup>. If linked with the monitoring of the implementation of the UNCAC, the European Neighbourhood Policy could serve as motor for the ENP countries to implement this convention, which was signed and/or ratified by most of the ENP countries and the European Community itself.

### Sanctions for Breach of Commitment

There are no legal sanctions for failure to implement commitments contained in ENP action plans. The ENP website indicates that the consequences of such failure would be political (in terms of the overall relationship) and/or financial (in terms of assistance provided in support of that policy area).

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<sup>2</sup> The checklist developed by UNODC serves as self-assessment of the implementation of the UNCAC. Click here to download the checklist: <http://www.unodc.org/unodc/en/treaties/CAC/index.html>

As the ENP does not create a new legal base for relations between the EU and its neighbours, the provisions of the Association Agreements continue to apply. Relations with partner countries can not be suspended for a breach of the commitments agreed upon in the ENP action plans but for breach of existing agreements' commitments. These usually contain a broader definition of shared values, especially with regard to anti-corruption commitments.

### **Lack of Civil Society Involvement**

Although the EU acknowledges the role of civil society in holding government accountable on the ENP Website, especially with regard to the monitoring of the reform objectives set out in the ENP action plans, the preparation of the ENP strategy papers and the negotiations of the actions plans were mostly conducted in an intergovernmental setting, without civil society participation. Such an approach is likely to undermine local ownership of anti-corruption efforts and limit the development of local accountability, where citizens are empowered to hold government accountable in anti-corruption matters. A number of civil society organisations have already taken position on the ENP process, advocating, among other issues, for greater transparency and increased civil society involvement in the decision making process as well as implementation of EC assistance under the ENPI. (Please see: <http://www.developmentportal.eu/wcm/subsite/enpi/content/category/6/37/80/>). The Commission is increasingly aware of this issue and is seeking to strengthen the civil society dimension of the ENP. ([http://ec.europa.eu/world/enp/pdf/non-paper\\_civil-society-dimension\\_en.pdf](http://ec.europa.eu/world/enp/pdf/non-paper_civil-society-dimension_en.pdf)).

As a concluding remark, some of the lessons learnt in using anti-corruption measures as political criteria for EU accession could be applied to the ENP process. A U4 Brief highlights some of the lessons from the Bulgarian experience. (Please see: <http://www.cmi.no/publications/file/?2956=anti-corruption-measures-as-political-criteria-for>). The following points are highlighted:

- In the accession process, the EU tended to view corruption as a matter of criminal justice and harmonised legislation rather than as a more complex and holistic development issue.
- In the absence of EU common anti-corruption standards, the Commission had to set benchmarks and formulate targets along the way. The benchmarks that were subsequently developed tended to be a check list of to-do items rather than measurable indicators of change. The lack of an effective monitoring mechanism to assess progress also challenged the credibility of the process.
- The EU engaged almost exclusively with the government in matters relating to anti-corruption reforms, making government accountable to Brussels rather than to citizens in this regard. As a result, EC supported anti-corruption reforms tended to be perceived by the public as a Brussels/Government business with little relevance to citizens.

## **Part 2: Fighting Corruption in the ENPI**

### ***ENPI Anti-Corruption Mechanisms***

Although corruption appears high on the agenda of the ENP, no specific anti-corruption mechanism has been put into place - other than the regular EU regulations and procedures - to ensure that EC assistance under the ENPI is protected from corruption. The issue is not explicitly addressed on the ENP website ([http://ec.europa.eu/world/enp/index\\_en.htm](http://ec.europa.eu/world/enp/index_en.htm)) and little public information and research is available on existing anti-corruption initiatives implemented by the Commission to prevent and monitor corruption in the administration of EU funds in this region. As the programme has been launched relatively recently, publicly available background research on the ENP has tended to focus on other policy dimensions, such as security, human rights and democratisation issues. (Please see: [http://ec.europa.eu/world/enp/pdf/background\\_material.pdf](http://ec.europa.eu/world/enp/pdf/background_material.pdf)).

The Commission primarily relies on existing mechanisms and institutions such as the European Anti-Fraud Office (OLAF) to address corruption risks within the ENP framework. Article 20 of the

regulations laying down general provisions establishing the ENPI states that any agreements "*shall contain provisions ensuring the protection of the Community's financial interests, in particular with respect to irregularities, fraud, corruption and any other illegal activity.*" It then refers to the general regulations on the protection of the European Communities' financial interests, on "on-the-spot" checks and inspections carried out by the commission and on investigations conducted by the European Anti-Fraud Office (OLAF). ([http://ec.europa.eu/world/enp/pdf/oj\\_l310\\_en.pdf](http://ec.europa.eu/world/enp/pdf/oj_l310_en.pdf)). Agreements should also entitle the Commission and the Court of Auditors to perform audits, including document audits as well as all necessary on-the-spot checks and inspections.

Also relevant is art.8 of "Council Regulation EC No 99/2000 of 18.01.2000 concerning the provision of assistance to the Partner States in Eastern Europe and Central Asia":

*" Title III Financial Provisions, Article 8*

*1. Community assistance shall in general be in the form of grants. They may generate funds that can be used for financing other cooperation projects or measures.*

*2. Financial decisions and contracts resulting therefrom shall expressly provide for the monitoring and financial supervision and control by the Commission and the Court of Auditors to be carried out on the spot if necessary."*

Civil society is increasingly aware of the challenges involved in connection with ENPI funds. In 2005, NGO representatives from 10 neighbouring countries prepared three position papers recommending among other measures ([http://www.boell.be/download/ENP\\_seminar\\_outputs\\_EN.doc](http://www.boell.be/download/ENP_seminar_outputs_EN.doc)):

- Financial flows must be fully transparent and reporting mechanisms put in place to ensure accountability of all ENP expenditures;
- Safeguards are needed within ENPI to ensure accountability of neighbouring countries in the expenditures of ENPI funds;
- Independent verification and monitoring of funds is critical. The ENPI should be monitored at all levels by independent monitoring committees with civil society representation;
- Capacity to accept the funds by neighbouring countries has to be assessed in terms of country corruption situation and proper usage of funds;
- Simple and easily accessible compliance mechanisms should be in place to assess ENP programs 'compliance with EU and national legislation. Such mechanism should also provide for the creation of an independent body that can be used by citizens to complaint ;
- ENPI should encourage neighbour states to adopt specific anti-corruption measures in order to prevent any misuse of the EU funds.

### **External aspects of EU Anti-Corruption Policy**

As EU assistance under ENPI relies on the Commission's general anti-corruption mechanisms, ENP funds face similar challenges of transparency and accountability to other EU funds.

An overview of the EU approach to anti-corruption is developed in a 2003 communication and lays the ground for a comprehensive EU anti-corruption policy. Among other principles, this document emphasises the need to implement, monitor and strengthen existing anti-corruption instruments, to develop common integrity standards across the EU, to improve investigative tools in Member States, and redouble efforts to protect the financial interests of the European Communities from corruption.

As part of its anti-corruption efforts, the EU has established its own instruments to tackle corruption, with two conventions on the protection of the European Communities' financial interests and on the fight against corruption involving officials of the European Communities and officials of EU Member States.

Useful related indications on EC procedures can also be found in section 2.3.3 of the "Practical Guide to contract procedures for EC external actions"

(Please see :

[http://ec.europa.eu/europeaid/work/procedures/implementation/common\\_documents/practical\\_guide/new\\_prag\\_final\\_en.pdf#page=1](http://ec.europa.eu/europeaid/work/procedures/implementation/common_documents/practical_guide/new_prag_final_en.pdf#page=1) ).

An overview of mechanisms in place to ensure accountability in EC's external relations and development policies is also provided on EuropeAid website.

(Please see: [http://ec.europa.eu/europeaid/how/accountability/index\\_en.htm](http://ec.europa.eu/europeaid/how/accountability/index_en.htm)).

Steps taken by the Commission to combat corruption also include the creation of the European Anti-Fraud Office (OLAF). Created in 1999 as an independent administrative body, OLAF is entrusted to investigate cases of corruption, fraud and other serious professional misconduct affecting EC budget within all EU institutions and bodies. However, OLAF doesn't have prosecution powers and relies on individual states to prosecute wrongdoers. (<http://europa.eu/scadplus/leg/en/lvb/l33301.htm>).

OLAF is competent to investigate ENP funds. As soon as the Commission services identify potential cases of corruption and/or fraud, these are immediately submitted to OLAF for further assessment and investigation. Once OLAF investigations come to an end and the conclusions are communicated to the respective Commission services, appropriate measures are taken according to OLAF recommendations which can correspond to a range of different actions of administrative, financial and/or judicial nature, mainly depending on the entity found guilty of misconduct and on the gravity of the said misconduct.

The European Court of Auditors (ECA) also has a role to play as it independently audits revenues and spending of EU funds and assesses errors in EU accounts. A small proportion of substantive errors uncovered by the ECA are reported by the court to OLAF.

The EU anti-corruption policy recommends increasing efforts to extend this policy to acceding, candidate and other third countries such as ENP countries, addressing corruption-related issues in dialogues with these countries and making the fight against corruption an integral part of external and trade policies. With this in mind, the Commission has drawn-up ten general principles targeting these countries, that include promoting the ratification of international anti-corruption instruments, developing targeted investigative techniques, statistics and indicators, strengthening the role of law enforcement bodies, promoting integrity, accountability and transparency in public administration, establishing clear rules on whistle blowing and reporting and tackling political corruption. The Commission's policy also mentions examining the possibilities of stepping-up police and judicial cooperation and developing mutual legal assistance with neighbouring countries.

In the area of cooperation agreements and external aid programmes, the policy includes reviewing the EU's framework agreement, specific financing agreements and tender documents, with the view to inserting anti-corruption clauses as it has been done in the case of the ACP-EU partnership agreement signed in Cotonou in 2000. This partnership explicitly addresses issues of "good governance" as a "fundamental element" of the agreement, with the agreed-upon definition of good governance including the fight against corruption. Under such cooperation agreements, serious cases of bribery and corruption can give rise to a consultation procedure. Although carefully worded, it allows suppression of cooperation "as a matter of last resort" if measures to remedy this situation are not taken.

### ***Transparency of EU Funds***

There is a growing demand from all stakeholders for better accountability and increased transparency of EU funds. The Commission adopted in 2006 a Green paper on the European Transparency Initiative, with the view to increasing the openness and accessibility of EU institutions, raising awareness over the use of the EU budget and making the Union's institutions more accountable to the public. The European Transparency Initiative (ETI) has four main components (Please see: [http://ec.europa.eu/commission\\_barroso/kallas/transparency\\_en.htm#2](http://ec.europa.eu/commission_barroso/kallas/transparency_en.htm#2)):

1. Increasing transparency on the use of EU funds;
2. Increasing transparency on the participation and influence of interest representatives on EU decision making;
3. Ethics for public office holders;
4. Access to documents.

As part of the efforts to increase transparency of EU funds, the Commission adopted a new set of financial rules to better use EU funds in the 2007-2013 financial framework. These rules are intended to simplify access to funding and reduce administrative procedures to a minimum. A major breakthrough to increase transparency of EU budget is the commitment of the EU to disclose beneficiaries of all EU funds. The names of beneficiaries of structural funds and external aid programmes (as of 2008) and agricultural subsidies (as of 2009) will have to be disclosed to public view in all Member States. Member states will also be required to improve reporting on how they spend the EU funds that they manage. In addition, the Commission intends to share the central database of organisations excluded from EU funding between all EU Institutions and Member States authorities. This database will contain all relevant information on entities condemned for fraud or corruption in the Member States and third countries involved in the implementation of EU programmes. (<http://europa.eu/rapid/pressReleasesAction.do?reference=IP/07/424>)

### ***Experiences of Corruption within the Framework of the ENP***

The Helpdesk hasn't found publicly available information on fraud or corruption cases within the framework of ENP assistance.

No mention is made of fraud or corruption investigations in neighbouring countries in the 2006 OLAF annual report. Cases under current investigation are kept confidential for obvious reasons. Only OLAF has a full overview of all fraud and/or corruption cases and is solely competent for providing statistics or any other form of fraud related information, partly due to the confidential nature of the topic. OLAF was contacted in the framework of this query but didn't provide information on its activities in the region in the required time frame. This answer will be updated upon reception of information. (Please see: [http://ec.europa.eu/anti\\_fraud/reports/commission/2006/en.pdf](http://ec.europa.eu/anti_fraud/reports/commission/2006/en.pdf)).

The European Court of Auditors' report 2006 does not contain specific information on ENP countries either. The report generally indicates that, as in other EU funds, a material level of error was found in external assistance. Failure to adhere to tendering procedures was found to be an essential source of substantive errors for external and pre-accession funds. 80% of external expenditures had been managed by the Commission's delegation in the various countries in the reporting period, most of which took the form of advances to organisations implementing development projects at country level. (Please see: <http://eca.europa.eu/portal/pls/portal/docs/1/479520.PDF>)

## **Part 3: Further reading and Resources**

### **UNODC Checklist**

Developed by UNODC, this checklist serves as self-assessment of the implementation of the UNCAC. <http://www.unodc.org/unodc/en/treaties/CAC/index.html>

### **Values in the EU's Neighbourhood Policy: Political Rhetoric or Reflection of a Coherent Policy?**

This article examines if the ENP is sufficiently justified on the basis of the political values it embodies. As part of this question, the third part article focuses on ENP instruments and the extent to which they allow for the practical implementation and institutionalisation of "shared values" though the policy. <http://www.ugbs.org/weru/eper/no7/bosse.pdf>

### **Communication on Strengthening the European Neighbourhood Policy**

This communication from the commission to the Council and the European Parliament assess the two first years of implementation of the ENP, analyses strengths and weaknesses and makes recommendations for intensifying efforts in the region. It is accompanied by an overall assessment of progress made in action plan implementation. ([http://ec.europa.eu/world/enp/pdf/com06\\_726\\_en.pdf](http://ec.europa.eu/world/enp/pdf/com06_726_en.pdf))

### **Non-Paper Expanding on the Proposals for Strengthening the ENP: Strengthening the Civil Society Dimension of the ENP**

Recognising that civil society is vital to the overall success of the ENP, this non-paper was prepared by the Commission to make proposals to strengthen the involvement of civil society in the ENP. ([http://ec.europa.eu/world/enp/pdf/non-paper\\_civil-society-dimension\\_en.pdf](http://ec.europa.eu/world/enp/pdf/non-paper_civil-society-dimension_en.pdf)).

### **Comments on the Non-Papers Expanding on the Proposals for Strengthening the European Neighbourhood Policy**

Aprodev, Eurostep and WWF published joint comments on the Commission non-papers on the Governance Facility, the Neighbourhood Investment Fund and the Neighbourhood Economic Community. (<http://www.developmentportal.eu/wcm/subsite/enpi/content/category/6/37/0/>).

### **Greening the ENP Capacity Building Seminar**

The Heinrich Böll Foundation and WWF-EPO jointly hosted a seminar in Brussels in December 2005 on the European Neighbourhood Policy. NGO representatives from Lebanon, Georgia, Ukraine, Armenia, Israel, Azerbaijan, Palestine and Morocco attended the meeting and produced position papers on various aspects of the ENP, including the need to involve civil society in the monitoring of the funds to enhance accountability of EU assistance under the ENPI. ([http://www.boell.be/download\\_de/ENP\\_seminar\\_outputs\\_EN.pdf](http://www.boell.be/download_de/ENP_seminar_outputs_EN.pdf)).

### **Improving transparency in EU Funding of Major Projects**

This paper summarises the contribution by 41 NGOs to the consultation on the European Transparency Initiative Green Paper. ([http://www.foeeurope.org/publications/2006/ETI\\_submission\\_on\\_major\\_projects\\_41\\_NGOs.pdf](http://www.foeeurope.org/publications/2006/ETI_submission_on_major_projects_41_NGOs.pdf))

### **Development Portal**

The Development portal is an independent portal on the EU's Development Co-operation, supported by civil society organisations from across Europe and the South. It aims at promoting transparency as well as access and sharing of information. It has a section dedicated to the ENPI, providing a tool for civil society actors to follow the discussions on the programming of assistance under the ENPI: It is intended as a tool that can be used to ensure that the programming process is transparent and accountable. (<http://www.developmentportal.eu/wcm/subsite/enpi/content/section/12/76/>).

### **The CEE Bankwatch Network**

The CEE Bankwatch Network is an international non-governmental organisation (NGO) with member organisations in 12 countries across the central and Eastern European region. The aim of the network is to monitor the activities of the international financial institutions which operate in the region and propose constructive alternatives to their policy and projects in the region.

<http://www.bankwatch.org/>

### **Coalition for Sustainable EU Funds**

Although not directly dealing with ENP funds, this coalition of NGOs looks at transparency issues of EU funds. [Friends of the Earth Europe](#), [CEE Bankwatch Network](#), [World Wide Fund for Nature](#), [BirdLife International](#), [Milieukontakti Oost-Europa](#), [CEEWEB](#) and [European Environmental Bureau](#) - in co-operation with other [national NGOs](#) in the EU-25 - set up an NGO coalition to influence the current reform of the EU funds in order to make sure that they are spent efficiently, in a transparent manner and that they contribute to sustainable development. (Please see the coalition's core position paper on the reform of EU funds:

[http://www.coalition-on-eufunds.org/Delivering\\_sustainable\\_development\\_NGO\\_Statement.pdf](http://www.coalition-on-eufunds.org/Delivering_sustainable_development_NGO_Statement.pdf)).