



Berlin Process

# Civil Society and Think Tank Forum 2025

Policy Recommendations





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## Policy Recommendations

This collection of policy recommendations has been elaborated as part of the project “Civil Society and Think Tank Forum 2025” in the framework of the Berlin Process, coordinated by the British Council with the support of the UK Government. Civil society organisations and think tanks from all Western Balkan countries engaged in a series of six cross-thematic in-country workshops in July 2025, followed by extensive consultations in August within their thematic working groups. These working groups addressed the following areas: Common Regional Market and Growth; Gender and Diversity; Reconciliation and Dealing with the Past; Environment, Energy and Decarbonisation; Security; and Good Governance. The working groups were led by rapporteurs from the region, who acted on behalf of civil society to synthesise discussions and draft the present collection of policy recommendations.

The analyses, interpretations, and opinions expressed in this publication do not necessarily reflect the official positions or views of the British Council or of the Government of the United Kingdom.

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## Abbreviations and Glossary

<b>2024 EU GBV Directive</b>	The Directive (EU) 2024/1385 on combating violence against women and domestic violence, adopted on 14 May 2024
<b>AI</b>	Artificial Intelligence
<b>API</b>	Application Programming Interface
<b>BP</b>	Berlin Process
<b>CBA</b>	Cost Benefit Analysis
<b>CBAM</b>	Carbon Border Adjustment Mechanism
<b>CEFTA</b>	The Central European Free Trade Agreement
<b>CERT EU</b>	The Cybersecurity Service for the Union institutions, bodies, offices and agencies (Regulation (EU, Euratom) 2023/2841 of the European Parliament and of the Council of 13 December 2023 laying down measures for a high common level of cybersecurity at the institutions, bodies, offices and agencies of the Union)
<b>CERT</b>	Computer Emergency Response Team
<b>Chapter 23</b>	<b>Chapter 23:</b> Judiciary and Fundamental Rights, EU Acquis
<b>Chapter 24</b>	<b>Chapter 24:</b> Justice, Freedom and Security, EU Acquis
<b>CRM</b>	Common Regional Market
<b>CSF</b>	Civil Society and Think Tank Forum
<b>CSOs</b>	Civil Society Organisations
<b>DSA</b>	Digital Services Act (Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act))
<b>DSCs</b>	DSCs Digital Service Coordinators (DSCs) are responsible for supervising, enforcing and monitoring the DSA. Each Member State has to designate and empower a Digital Services Coordinator (DSC), who is responsible for all matters relating to the application and enforcement of the DSA in that country.
<b>EDMO</b>	European Digital Media Observatory
<b>EIA</b>	Environmental Impact Assessment
<b>ENISA</b>	The European Union Agency for Cybersecurity

<b>ESAP</b>	Employment and Social Affairs Platform
<b>ETS</b>	Emissions Trading Systems
<b>EU ETS</b>	European Emissions Trading Systems
<b>EU</b>	European Union
<b>FIMI</b>	Foreign Information Manipulation and Interference
<b>GAP III</b>	Action Plan on Gender Equality and Women's Empowerment in External Relations 2020–2025 (GAP III)
<b>GAWB</b>	Green Agenda for Western Balkans
<b>GBV</b>	Gender-based violence
<b>GHG</b>	Greenhouse Gas
<b>IPA III</b>	Instrument for Pre-Accession Assistance (2021-2027)IPA III
<b>Istanbul Convention</b>	The Council of Europe Convention on preventing and combating violence against women and domestic violence, also known as “the Istanbul Convention”
<b>JHB</b>	Joint History Books (Joint History Books are collection of historical sources from Southeast European countries, designed to inspire students and empower history teachers with diverse perspectives. Visit <a href="https://jointhistory.net/">https://jointhistory.net/</a> )
<b>JTF</b>	Just Transition Fund (Regulation (EU) 2021/1056 sets up the Just Transition Fund (JTF), which aims to support the people, economies and environment of territories that face serious socioeconomic challenges stemming from the shift towards a climate-neutral European Union (EU).
<b>LGBTQIA+</b>	Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, Intersex and Asexual. The “+” represents other identities that exist in the community.
<b>MRV</b>	Monitoring, Reporting and Verification
<b>NIS2</b>	Network and Information Security Directive (Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) No 910/2014 and Directive (EU)
<b>ODIHR</b>	Office for Democratic Institutions and Human Rights
<b>PV</b>	Photovoltaic
<b>QA</b>	Quality Assurance

<b>QS</b>	Quality Control
<b>RCC</b>	Regional Cooperation Council
<b>REC</b>	Renewable energy communities (RECs)
<b>RYCO</b>	Regional Youth Cooperation Office
<b>SAA</b>	The Stabilisation and Association Agreement
<b>SAIs</b>	Supreme Audit Institutions
<b>SEA</b>	Strategic Environmental Assessment
<b>SEE</b>	South East Europe or Southeastern Europe
<b>SEECp</b>	The South-East European Cooperation Process
<b>SLAPP</b>	Strategic Lawsuits Against Public Participation
<b>SMEs</b>	Small and Medium-sized Enterprises
<b>TF-GBV</b>	Technology-facilitated gender-based violence
<b>UN</b>	United Nations
<b>VLOPs</b>	Very Large Online Platforms (The DSA classifies platforms or search engines that have more than 45 million users per month in the EU as very large online platforms (VLOPs) or very large online search engines (VLOSEs).
<b>VLOSEs</b>	Very large Online Search Engines (See VLOPs)
<b>WB6</b>	The Western Balkans Six (WB6) comprise of six countries Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, and Serbia
<b>WBIF</b>	Western Balkans Investment Framework
<b>WPS</b>	Women, Peace and Security



## **Preface**

In October 2025, the United Kingdom will host the Berlin Process Leaders' Summit in London, continuing the tradition of bringing together governments of the Western Balkan six countries with European partners to strengthen regional cooperation, support economic development, and advance closer European alignment. Alongside the official ministerial meetings, the UK is supporting a series of side events – including forums on business, culture, youth, and gender equality – of which the Civil Society and Think Tank Forum (CSF) is one.

The CSF is a key regional platform convened under the umbrella of the Berlin Process. It brings together a diverse group of stakeholders from the region, including a cross-section of CSOs focused on different thematic issues, members of parliament, government representatives, independent institutions, regional bodies, international organisations, and EU institutions.

As hosts of the CSF 2025, the British Council's aim is to deliver a format that learns from and keeps true to the central core of previous CSF iterations, while building on innovation. The British Council's overriding aim has been to provide a space for open and inclusive dialogue, to ensure that the voice of civil society is heard within the broader Berlin Process.

The process of developing recommendations began with a series of in-country workshops held in July in Belgrade, Tirana, Podgorica, Sarajevo, Skopje, and Pristina and continued in August with online discussions and written contributions. This consultative process convened over 70 civil society representatives to identify key priorities across six thematic areas: Common Regional Market and Growth; Gender and Diversity; Reconciliation and Dealing with the Past; Environment, Energy and Decarbonisation; Security; and Good Governance. Rapporteurs used these inputs to develop the recommendations presented in this document.

The process will culminate at the CSF 2025 in Podgorica on 22–23 September, held one month before the Summit on 22 October. At the Forum, perspectives of civil society and think tanks will be presented and discussed directly with stakeholders from the region and Europe. Alongside these exchanges, the Forum will also host four spotlight sessions – on Media, Migration, Youth, and the CSO Operating Environment – that will provide space for deeper discussion of pressing cross-cutting issues.

The recommendations presented here reflect on progress since the previous year, but also provide deep expertise and civic insight, embodying a shared commitment to democratic values, regional cooperation, and long-term peace and development. They are addressed to WB6 Governments, Berlin Process Partner Governments, EU Institutions, Regional and Intergovernmental Organisations and Civil Society.

## **Editorial Team**



01

GOOD GOVERNANCE

## ***Despite formal commitments to EU values, governance across the Western Balkans remains undermined by entrenched state capture and democratic backsliding***

### **Introduction**

Governance across the Western Balkans is increasingly marked by democratic backsliding, state capture, and weakening political accountability. While the Berlin Process and EU accession frameworks emphasise reform, implementation is often superficial, selectively applied, or pursued for external legitimacy. Authoritarian tendencies and the erosion of checks and balances undermine institutions, especially in the judiciary, law enforcement agencies, oversight bodies, public administration, and electoral systems. Political elites often exploit reforms to consolidate power, maintain patronage networks, and delay meaningful change.

The judiciary in most countries remains highly vulnerable to political interference. Civil society and media operate in increasingly hostile environments, facing restrictions, defamation campaigns, and financial constraints. Citizens, especially marginalised groups, are largely excluded from decision-making, while anti-corruption frameworks are often toothless or ignored.

These persistent governance deficits not only hamper EU integration but also damage public trust and increase societal polarisation. To break the cycle of reform stagnation and democratic erosion, comprehensive, inclusive, and monitored reform is essential.

### **Progress Check and Key Challenges**

While some WB6 Governments have introduced new laws and strategies under EU requirements and integration processes, implementation remains selective and often symbolic. There is limited follow-through on reform commitments, and a growing credibility gap between declared intentions and actual practices.

Democratic backsliding is visible across the region, with increasing of authoritarian tendencies and erosion of democratic institutions.

The compromised independence and integrity of the judiciary are the main obstacles to establishment of rule of law across the region. Only Albania has undertaken comprehensive judicial vetting. Other countries continue to struggle with establishing mechanisms for judicial independence, integrity, and accountability. Politicised judicial appointments and lack of prosecutorial autonomy hinder effective anti-corruption efforts across the region. Despite stronger institutional mandates in some cases, and establishment of specialised bodies, enforcement remains weak, often due to political interference or lack of resources.

Civic space is shrinking across the region. Repressive laws, administrative burdens, and public smear campaigns are used to marginalise critical voices. Formal mechanisms for civil society participation in policymaking exist but are rarely meaningful.

State capture remains systemic, affecting sectors from public procurement and appointments to environmental governance and media regulation. Oversight bodies, ombudspersons, audit authorities, anti-corruption agencies and other institutions in charge of ensuring accountability, are frequently politicised, underfunded, ignored, or lack authority. Strategic documents are adopted without transparency or public consultation and lack clear implementation mechanisms. Public administration reforms remain superficial, failing to address clientelism, administrative burden, or performance.

High youth emigration reflects weak institutions, lack of meritocracy, perspective, political instability, and exclusion from policymaking. Women remain underrepresented in public office and decision-making, while GBV and discrimination persist. Migration governance focuses more on control than on integration, while corruption and organised crime are deeply-rooted in border control operations.

The EU and Berlin Process partners are increasingly perceived as tolerant of backsliding, as long as formal criteria are met. This weakens their leverage and legitimacy. Conditionality is inconsistently applied, and monitoring often overlooks the quality and inclusiveness of reforms. This undermines leverage and emboldens governments to pursue performative reforms and evade introduction of proper accountability mechanisms.

## Policy Recommendations

### Recommendations to WB6 Governments

- **Expand and harmonise judicial vetting and integrity checks.** Support and promote the introduction of judicial vetting procedures through integrity checks across all WB6 countries, adapted to national contexts and constitutional set-ups. Integrate asset verification, ethics reviews, and anti-corruption screening for judges and prosecutors, while ensuring sufficient capacity of judicial institutions.
- **Combat political corruption and state capture.** Develop a regional framework for integrity in public office, including standards on election integrity, political finance, lobbying, and conflict of interest. Monitor undue influence over public contracting, state-owned enterprises, and appointments. Introduce integrity checks and transparency obligations across natural resource allocation sectors, including public procurement, concessions, environmental permitting.
- **Strengthen oversight bodies and law enforcement independence.** Guarantee financial and operational independence, authority and capacities of supreme audit institutions (SAIs), ombudspersons, anti-corruption agencies and other regulatory bodies such as electoral management bodies, public procurement agencies, and inspectorates. Introduce regional benchmarks for performance, staffing, and ensure public access to findings.
- **Depoliticise public administration, ensure meritocracy and address the administrative burden.** Undertake comprehensive reform of public administration, prioritising professionalisation and depolitisation, establishing merit-based recruitment, independent oversight and reducing excessive bureaucratic obstacles. Ensure independent oversight mechanisms and clear professional criteria in recruitment procedures. Reduce administrative burden to improve governance, remove complex procedures and overlapping competencies. This would improve efficiency, decrease corruption risks, and barriers for citizens and businesses. Prioritise digitalisation, streamline procedures, and align

processes with EU standards to ensure more efficient, citizen-centred service delivery.

- **Protect civic space and independent media.** Repeal restrictive laws targeting freedom of association and expression, specifically those on media restrictions and alleged foreign agents. Harmonise national frameworks with European Media Freedom Act and anti-SLAPP legislation. Ensure meaningful, open and safe consultations and the participation of civil society in decision-making processes. Establish national and regional support funds for watchdog CSOs and investigative media.
- **Institutionalise participation and transparency in reforms, ensuring participatory policymaking.** Create multi-stakeholder bodies and ensure social dialogue in monitoring implementation of strategies, laws, and sectoral reforms. Ensure anti-corruption and judicial reforms include gender-sensitive indicators and representation, ensuring equal access to justice. Strengthen accountability mechanisms for inclusive service delivery and monitor the impact of policies on women, youth, and minorities.

### Recommendations to Berlin Process Partners

- **Institutionalise rule of law and accountability in the Berlin Process.** Establish a formal Berlin Process mechanism on good governance, with a mandate to monitor democratisation, rule of law, judicial independence, political integrity, and civic space, with the structured and meaningful participation of civil society. Reinforce monitoring mechanisms for rule of law benchmarks under the Berlin Process.
- **Condition support and partnerships on verifiable progress in democratic governance and rule of law.** All political, financial, and technical support to WB6 countries should be conditioned on measurable and independently verified progress in democratic governance and the rule of law. This includes credible reforms in judicial independence, effective anti-corruption enforcement, and the protection of civic space.
- **Ensure meaningful participation of civil society actors in BP meetings.** Emphasise the importance of the inclusion of all stakeholders and restore a platform for joint participation. Establish regional platforms for civil society engagement in EU and BP reform monitoring.
- **Support programmes for independent institutions and civic actors.** Design and fund targeted programs that strengthen the independence, resilience, and operational capacity of oversight institutions and civic actors. Enable sustained political, financial, and technical assistance to institutions such as SAs, ombudspersons, anti-corruption agencies, electoral commissions, and inspectorates. This would ensure that they can operate free from political interference. Direct support for civil society should include multi-annual funding, capacity building, and protection mechanisms against political pressure, smear campaigns, and legal harassment.

### Recommendations to EU Member States and the European Commission

- **Apply consistent conditionality to discourage democratic backsliding and performative reforms.** Conditionality must prioritise implementation and

measurable impact over the mere formal adoption of legislation, thereby closing the credibility gap between declared commitments and practice.

- **Require and support transparent, participatory reform processes.** Make public participation and transparency mandatory in all EU-related and Berlin Process reforms and introduce stronger monitoring frameworks with the participation of civil society, ensuring that reforms are inclusive.
- **Prioritise good governance and the rule of law in Growth Plans and IPA III allocations.** Financial assistance must be tied to clear governance benchmarks, ensuring that investments support transparent institutions, independent judiciaries, and accountable public administrations, rather than reinforcing clientelism or state capture. The support should depend on verifiable progress, with independent monitoring mechanisms, including civil society, academia, and watchdog organisations, embedded into oversight structures.
- **Closely monitor state capture risks and support investigative mechanisms.** Systematically integrate state capture risk assessment into all stages of the enlargement process and funding instruments. This should move beyond formal legislative compliance to scrutinise how power is exercised in practice, including undue influence over the judiciary, law enforcement agencies, public procurement, natural resource management, state-owned enterprises, and political finance. Provide direct support to investigative and oversight mechanisms at both institutional and civic levels.

#### **Recommendations to Civil Society Organisations and Think-Tanks in the WB6:**

- **Advocate and monitor implementation of governance reforms and expose systemic capture.** Take a proactive role in advocating for, monitoring, and reporting on the implementation of governance reforms. This should move from formal consultations to developing independent monitoring tools that track whether reforms are enforced, inclusive, and effective in strengthening rule of law and accountability. Consistently monitoring reforms, exposing capture networks, and reframing governance as a question of human security and opportunity would strengthen citizen demand for genuine change and ensure that the Berlin Process and EU integration are not just box-ticking exercises.
- **Promote cross-border cooperation and learning on accountability and rule of law.** Expand regional cooperation and form coalitions that pool expertise, share data, and amplify advocacy across borders. Establish partnerships with academia, media, and grassroots initiatives, particularly youth, to broaden the evidence base and mobilise citizen support for reforms.
- **Develop and disseminate evidence-based policy recommendations.** Strengthen the role of CSOs as independent sources of expertise by producing rigorous, evidence-based policy recommendations on governance reforms. Ensure that policy outputs are accessible, understandable, and actionable for policymakers, media, and the wider public. Propose concrete legislative, institutional, and administrative measures tailored to each country's context.
- **Strengthen citizen engagement and demand-driven reform through participatory mechanisms.** Design participatory mechanisms such as citizen assemblies, community monitoring platforms, participatory budgeting initiatives, and digital feedback tools that allow citizens, including youth, women, and marginalised groups, to directly influence policy debates and decisions.



# 02

## SECURITY (CYBERSECURITY AND DISINFORMATION)



## **Western Balkan Governments need to match digital development with coherent, rights-based responses to rising cybersecurity risks and disinformation**

### **Introduction**

The Western Balkans are undergoing rapid digital transformation, but governance responses remain slow, fragmented, and insufficient. As cyberattacks intensify, AI-driven disinformation spreads, and surveillance practices multiply, the security of citizens, civil society, and democratic institutions is increasingly under threat - particularly where digital instability intersects with unresolved political or territorial tensions.

Cybersecurity and information integrity are no longer niche or technical concerns. They are structural governance challenges that expose institutional fragility, accelerate corruption, and open the door to foreign interference and societal polarisation. Yet, governments continue to approach these issues in reactive, siloed, and top-down ways, often sidelining civil society, media, and expert communities.

The digital environment has also become a space of exclusion. Women, youth, and minorities remain underrepresented in cybersecurity policymaking and overexposed to online abuse. Civic actors face growing intimidation, while watchdog organisations struggle to survive amidst shrinking funding and donor withdrawals.

For the BP – a framework rooted in cooperation, stability and EU alignment – addressing these threats through inclusive, transparent, and rights-based policies is essential. Without strong protections for digital rights, media freedom, and civic space, the region risks further democratic backsliding, technological exploitation, and societal fragmentation.

### **Progress Check and Key Challenges**

Little meaningful progress has been made in implementing the CSF 2024 recommendations. While some working groups were formed and draft laws initiated, most reforms remain stalled, superficial, or developed without meaningful civil society participation. Institutional responses to cyber threats, disinformation, and digital rights violations are fragmented, reactive, and lack strategic coherence. Even where cybersecurity strategies exist, implementation is undermined by weak institutional capacity, opaque procurement procedures, budget limitations, limited investment in domestic expertise, and the absence of mechanisms to encourage gender inclusion in the sector.

Governments continue to treat cybersecurity as a technical matter, rather than one tied to governance, rights, and trust. Corruption extends into cybersecurity procurement, and oversight is often absent. In several WB6 countries, digital assets and cryptocurrencies remain poorly regulated, creating risks for illicit financial flows and cross-border criminal activity. Surveillance technologies are acquired through opaque processes and misused to monitor critics.



Media and civil society face intensifying pressure. Soft censorship, foreign ownership, and alignment with interest groups contribute to media capture. Independent outlets and watchdog organisations struggle to survive amidst shrinking donor support, especially following the withdrawal of key US donors. The anticipated withdrawal of Meta from fact-checking in Europe further threatens efforts to counter information manipulation.

It is important to highlight in particular the deteriorating wider security situation in Serbia, where authoritarianism, political violence, and intimidation represent a broader threat to citizen security. Independent journalism and civil society operate in an increasingly hostile environment, marked by smear campaigns, surveillance, and physical danger – conditions that not only undermine democracy but pose direct risks to public safety.

Similar concerns were raised in relation to Kosovo, where unresolved interethnic frictions – particularly in the north – continue to generate security risks. Isolated incidents, including attacks on infrastructure, illustrate a volatile environment that demands sustained attention.

The EU has recognised many of these risks, but engagement remains inconsistent and overly focused on formal legal alignment. Civil society inputs are welcomed, but reforms are primarily assessed through the lens of legal harmonisation, rather than actual impact. The EU's tendency to legitimise governments despite poor democratic credentials undermines its transformative potential.

Low levels of digital and media literacy further weaken public resilience. Citizens remain vulnerable to manipulation, with limited capacity to navigate complex digital environments. Without stronger protections, inclusive processes, and trust-based governance, many of the CSF 2024 recommendations remain not only valid, but more urgent than ever.

## Policy Recommendations

### Recommendations to WB6 Governments

- **Adopt and implement EU-aligned legislation.** This should include the Digital Services Act, Artificial Intelligence Act and European Media Freedom Act, and the Network and Information Security (NIS) 2 Directive. It should also include provisions on media ownership transparency, algorithmic accountability, anti-SLAPP (Strategic Lawsuits Against Public Participation) safeguards, and the designation of independent Digital Services Coordinators (DSCs) with structured civil society participation, supported by sufficient capacities and resources. Governments should proactively engage with the European Commission, online platforms, and with each other to ensure a harmonised regional approach and structured cooperation with Very Large Online Platforms (VLOPs) and Search Engines (VLOSEs).
- **Ensure structured cooperation with civil society, academia, and media experts in digital policymaking.** This should include the development, monitoring, and evaluation of cybersecurity, AI, and disinformation-related frameworks, to move beyond tokenistic consultation and foster inclusive and rights-based governance.
- **Develop and operationalise national strategies to counter Foreign Information Manipulation and Interference (FIMI) using a whole-of-society**

**approach.** This should include formal mechanisms for coordination between government bodies, independent media, fact-checking organisations, academia, and the private sector. Strategies should include joint threat analysis, transparent communication protocols during information crises, and continuous, inclusive policy development.

- **Develop and finance large-scale digital, media and cybersecurity literacy programs.** Integrate them into formal and informal education systems from early childhood to adult learning, in close cooperation with civil society organisations, educators, and independent media.
- **Strengthen national institutional capacities in cybersecurity.** Ensure transparency in procurement, improve inter-agency coordination, and increase investments in domestic expertise and strategic cybersecurity projects, gender-inclusive recruitment, and the retention of skilled professionals.
- **Approach the EU with a clear roadmap for structured cooperation with the European Union Agency for Cybersecurity (ENISA).** Request observer status and phased integration into EU cybersecurity mechanisms, while advocating for amendments to the EU cybersecurity regulatory framework to allow inclusion of accession countries.
- **Establish comprehensive regulatory frameworks for virtual assets and service providers.** This should be developed in line with EU standards to mitigate illicit financial flows and criminal misuse of digital assets through transparency, licensing, and monitoring obligations.
- **Introduce clear and transparent standards of information integrity.** This should be a prerequisite for eligibility to participate in publicly funded communication campaigns or other state-supported information initiatives, ensuring that public resources do not incentivise the spread of disinformation.
- **Ensure gender-responsive approaches in cybersecurity and information integrity policies.** Include targeted recruitment education and training of women in the digital security sector, protection against online GBV, and inclusion of gender expertise in all relevant strategies.

#### **Recommendations to Berlin Process Partner Governments:**

- **Use political dialogue within the Berlin Process to call out authoritarian tendencies and digital repression.** This should reference threats to journalists, civil society, and electoral integrity, and ensure WB6 Governments are held accountable for undermining information integrity and public trust.
- **Take coordinated action in response to the deteriorating media freedom and civic space in Serbia.** Increase political pressure, publicly support independent watchdogs and journalists, and condition engagement on measurable improvements in democratic safeguards.
- **Support coordinated, preventive engagement in response to ongoing tensions affecting interethnic areas of Kosovo, particularly in the north.** Facilitate security confidence-building measures between Kosovo and Serbia, protect critical infrastructure, and reinforce local trust in institutions, as part of a broader effort to strengthen stability and resilience in a complex security environment.

- **Promote a regional, coordinated approach to digital governance.** Encourage WB6 Governments to harmonise legislation, jointly cooperate with online platforms, and avoid fragmented national regulations that weaken the digital single market logic.
- **Share experiences and know-how on the implementation of EU digital legislation with WB6 governments and civil society.** This would support effective alignment, build institutional capacity, and strengthen democratic and rights-based approaches to digital governance.
- **Support civil society, professional media, and organisations working on cybersecurity,** fact-checking, and democratic resilience through long-term financial commitments and political protection. This would recognise their role in countering disinformation, resisting digital authoritarianism, and protecting public trust.
- **Support access to technology for civil society organisations, independent media, grassroots groups and activists.** This would build and democratise cyber resilience in society.

#### **Recommendations to EU Member States and the European Commission:**

- **Include a dedicated section on digital reforms in the annual EU Rule of Law report for WB6 countries.** Ensure that it incorporates institutionalised and structured feedback from civil society, particularly in the fields of cybersecurity, disinformation, and media regulation.
- **Integrate resilience to FIMI as a monitored element within the EU accession process.** Assess both the functional effectiveness of national strategies and the extent of state-sponsored disinformation, and formally incorporate findings from independent civil society monitoring into evaluations.
- **Condition digital transition support on transparency, inclusiveness, and rule of law.** Avoid superficial assessments of legislative alignment and ensure that funding strengthens democratic safeguards and public trust.
- **Make budgeting for cybersecurity mandatory across all funding mechanisms provided by the EU and EU Member States in the WB6.** This would ensure sustainable investment in infrastructure, skills, and strategic projects.
- **Initiate structured negotiations on WB6 participation in ENISA and explore legal avenues for observer status and phased membership.** This should include amending the EU cybersecurity regulatory framework to allow accession countries to be gradually integrated.
- **Support full application of the DSA principles in WB6 countries.** Include WB6 DSCs in coordination mechanisms such as joint investigations, task forces, and mutual assistance networks under the DSA framework.
- **Formalise EU–WB6 digital cooperation, drawing on examples such as the EU–Moldova framework.** Include initiatives like establishing a regional European Digital Media Observatory (EDMO) hub to strengthen resilience in strategic areas.
- **Engage VLOPs and VLOSEs to expand their DSA obligations to WB6.** This should include transparency reporting, cooperation with local DSCs, and support

for fact-checkers, trusted flaggers, and vetted researchers operating in the region, and the extension of their risk mitigation obligations related to disinformation and electoral integrity.

- **Extend the protections envisaged under the European Democracy Shield to the WB6 as accession countries.** This should include early integration into EU mechanisms safeguarding electoral integrity, the information space, and democratic resilience.
- **Ensure that gender equality and anti-discrimination commitments are enforced as core components of EU accession and digital reform processes.** Include monitoring of implementation and targeted support for institutions and CSOs facing backlash and marginalisation.

### **Recommendations to Regional and Intergovernmental Organisations:**

- **Support the creation of regional cybersecurity cooperation mechanisms.** Include joint threat assessments, incident response coordination, and structured knowledge-sharing among national Computer Emergency Response Teams (CERTs) and regulatory bodies, with the involvement of CERT-EU and relevant EU counterparts.
- **Facilitate regional dialogues on AI and disinformation governance.** This would promote the development of common standards and human rights-based frameworks aligned with the EU model, adapted to the complex realities of the WB6 region.
- **Assist in mapping and coordinating digital-related support efforts across the region.** This would reduce duplication, improve transparency, and ensure complementarity between bilateral, EU, and multilateral initiatives in the field of cybersecurity, digital rights, and media resilience.
- **Support coordinated regional efforts to combat TF-GBV.** This should include online harassment, hate speech, and political violence targeting women and LGBTQIA+ individuals. Regional action plans should strengthen prevention, protection, and accountability mechanisms, and include specific measures against disinformation and extremist narratives.

### **Recommendations to Civil Society Organisations and Think-Tanks in the WB6:**

- **Strengthen regional cooperation and joint advocacy on digital rights and platform accountability.** Include coordinated engagement with the EU, online platforms, and national authorities to amplify civil society's influence and visibility.
- **Strengthen internal capacities for cybersecurity, media monitoring, and digital literacy, by securing access to adequate funding, tools, and technology.** While some CSOs already possess relevant expertise, further investment is needed to expand skills in tracking disinformation trends, conducting digital forensics, documenting online harms, and assessing the democratic impact of emerging technologies like AI.
- **Actively engage in digital policy development at all levels.** This should include advocating for inclusive, transparent, and rights-based governance and contributing expertise to the design of literacy programs, regulatory reform, and

oversight mechanisms. It should also support local and smaller CSOs to build their capacities and provide input for local digital policy and measures development.

- **Monitor and counter anti-gender narratives that threaten democratic values.** This should document their spread, analyse links with disinformation and extremism, and work with allies in media, education, and institutions. Doing so would uphold gender equality and inclusive democratic norms.



# 03

## RECONCILIATION AND DEALING WITH THE PAST

## ***Shared commitment to truth, justice, and reconciliation is essential for peace, democracy, and prosperity in the Western Balkans***

### **Introduction**

Dealing with the past and fostering reconciliation are essential and long-term processes that must remain central to post-conflict recovery, security and democratic consolidation in the Western Balkans. The region's unresolved and painful legacy continues to shape its socio-political dynamics, often impeding deeper regional cooperation, trust-building, and the realisation of tangible benefits for its citizens.

The legacy of the Second World War, the wars that followed the dissolution of Yugoslavia, and the impact of totalitarian regimes have left enduring scars on the region. Inter-generational trauma and deeply rooted narratives of victimhood and blame continue to influence perceptions of neighbouring countries. Justice for victims remains incomplete, and progress toward reconciliation is hindered by denial of atrocities, mono-ethnic cultures of remembrance, one-sided historical narratives, and political exploitation of unresolved trauma.

These challenges are not confined to the past. Contemporary geopolitical tensions and foreign malign influences are adding new layers of complexity, further polarising societies and undermining trust. While Croatia's EU accession in 2013 marked a significant milestone, Croatia should still remain an integral part of the regional reconciliation process and share responsibility in addressing the legacies of the past.

If the Western Balkans is to build a future based on peace, democracy, and prosperity, a shared commitment to dealing with the past and investing in inclusive, cross-border reconciliation must be reinforced within the framework of the Berlin Process.

### **Progress Check and Key Challenges**

The 2024 Joint Declaration on Reaffirming Good Neighbourly Relations and Regional Cooperation marked an important step for the Western Balkans in addressing the region's difficult past. While international actors have considered key recommendations from the CSF 2024, local engagement remains limited. Many recommendations targeted Western Balkan Governments, but dialogue has been hampered by persistent bilateral tensions, especially between Serbia, Bosnia and Herzegovina, and Kosovo.

Several CSF recommendations emphasised the role of the media in reconciliation, urging ethical standards to counter hate speech, antigypsyism, and false narratives about history. However, implementation remains lacking. Efforts to support ethical codes in media and to fund media literacy initiatives have yet to gain traction. Similarly, calls for the BP partners and the EU to establish clear benchmarks for monitoring reconciliation commitments have been discussed but not yet realised. Progress has been made, though, in ensuring consistent reporting on reconciliation efforts, as reflected in recent European Commission country reports and European Parliament resolutions, which hold Western Balkan governments accountable for actions undermining good neighbourly relations.



Gender considerations require greater integration within reconciliation processes. Organisations supporting survivors of wartime sexual violence have made significant contributions, yet women activists often face GBV due to their public advocacy. Addressing these challenges is essential for inclusive reconciliation.

Political disputes and hostilities continue to fuel fear-driven migration across the region, underscoring the need to build a sustainable and peaceful future grounded in respect for human rights. Confronting legacies of violence and totalitarianism is critical for establishing functioning democracies and delivering justice to victims.

Youth are recognised as key drivers of democratisation and peacebuilding. However, their potential in dealing with the past is often underestimated, and the absence of Croatia from regional reconciliation mechanisms like RYCO leaves a gap in youth engagement. Young people from WB6 countries offer diverse perspectives shaped by their national contexts and can significantly contribute to reconciliation by challenging dominant narratives and addressing the root causes of conflict.

Incorporating gender, youth, migration, media, disinformation, and EU accession challenges into the reconciliation agenda remains vital to fostering durable peace and democracy in the Western Balkans.

## Policy Recommendations

### Recommendations to WB6 Governments

- **Develop national programmes to address trans-generational and collective trauma rooted in conflict and authoritarian pasts.** These programmes should include psychological support, public dialogue initiatives, and school-based education, implemented in partnership with civil society and victim associations.
- **Promote public acknowledgment of past atrocities.** State leaders and institutions must take active responsibility by issuing formal apologies, participating in memorial events, and encouraging inclusive narratives that move away from monoethnic remembrance practices.
- **Combat hate speech and inflammatory rhetoric in public and political discourse.** Ministries of Information should adopt national action plans that promote responsible communication and establish sanctions for public officials and media that spread divisive or violent messages.
- **Strengthen cooperation on war crimes prosecution.** Improve regional judicial collaboration to prevent impunity, including mechanisms to avoid politically motivated trials in absentia and ensure fair processes in cases involving foreign nationals.
- **Invest in language learning and cultural exchange.** Efforts should be focused on communities divided by past conflicts, with a focus on youth, journalists, and public sector workers.
- **Ensure media regulation and accountability.** Media outlets should be held to strong ethical standards. Regulatory agencies must be empowered to penalise hate speech, disinformation, antigypsyism, and anti-gender content, while promoting independent journalism.



- **Reform legal frameworks to provide reparations to civilian war victims.** This should apply particularly to marginalised groups such as Roma, survivors of wartime sexual violence, and children born of rape. These reforms should include institutional recognition, financial compensation, and psychosocial support.
- **Ensure meaningful participation of Roma, women, and other marginalised communities in policymaking on dealing with the past.** Create inclusive consultation platforms and appoint experts from these communities to official reconciliation working groups.
- **Revise national history curricula.** This should include multi-perspective narratives of conflict, dictatorship, and human rights abuses, drawing on regional materials and international best practices.
- **Establish bilateral and regional platforms for education professionals.** This would allow education professionals to exchange teaching methods and use existing tools such as Joint History Books (JHB), with support from Ministries of Education and CSOs.
- **Expand government-supported youth exchange programmes.** Ensure cross-border initiatives are inclusive of all ethnic and social groups, with set targets for gender balance and participation from marginalised communities.

#### **Recommendations to Berlin Process Partners:**

- **Strengthen the Berlin Process as a long-term platform for dialogue.** The process enables consistent collaboration between governments, CSOs, youth organisations, and victims' groups. Introduce an annual reconciliation progress report to be discussed at the Leaders' Summit.
- **Ensure Croatia's full participation in Berlin Process activities related to reconciliation, youth cooperation, and historical justice.** This would support a comprehensive and inclusive regional approach.
- **Support new regional reconciliation mechanisms.** These should be modelled on successful initiatives like RYCO, that include civil society voices, educational actors, and survivors in decision-making.
- **Enhance the visibility and funding of RYCO, ensuring that reconciliation is central to its programming and outreach.** Set targets for youth participation in all member states and increase efforts to engage underrepresented groups.
- **Promote joint history education tools, including development of regional history textbooks and digital resources.** Support teacher trainings focused on inclusive pedagogy, critical thinking, and truth-telling.

#### **Recommendations to EU Member States and the European Commission:**

- **Prioritise transitional justice and reconciliation in EU–WB6 political dialogue, especially through Chapters 23 and 24.** Set clear, measurable indicators and deadlines for tracking progress in these areas.
- **Integrate dealing with the past and reconciliation as cross-cutting issues in all EU-funded regional programmes.** This should include infrastructure, energy,

digitalisation, and green transition, to ensure these initiatives contribute to long-term peace.

- **Develop an annual EU–WB6 reconciliation strategy.** This should include a structured platform for engagement between civil society, victims' groups, and governments. In the case of Albania, ensure the strategy addresses the communist past, with special attention to memorialisation, political prisoners, and survivors of persecution.
- **Support cultural cooperation and cross-border artistic production.** This would recognise the role of arts in healing trauma, fostering empathy, and bridging divides.
- **Establish clear reconciliation benchmarks within EU integration processes.** Treat transitional justice as a key pillar of the EU's peace and security agenda, especially amidst growing threats of instability and political manipulation of the past.
- **Increase support for digital resilience and media literacy.** This should include funding a regional strategy to combat disinformation, foreign malign influence, and online hate speech, with a focus on youth and vulnerable communities.

#### **Recommendations to Regional and Intergovernmental Organisations:**

- **Ensure the continuous involvement of youth in regional exchange programmes to prioritise reconciliation and mutual understanding.** Promote equal access for young women, Roma, LGBTQIA+ youth, and others from marginalised backgrounds.
- **Organise regional training programmes that facilitate knowledge transfer between WB6 experts and peers from other post-conflict or conflict-affected societies.** For example, this could include Rwanda, South Africa, and Northern Ireland. Trainings should focus on victim-centred justice, gender-sensitive reconciliation, and effective memorialisation practices.
- **Strengthen gender-responsive approaches to dealing with the past.** Ensure regional frameworks explicitly address wartime sexual violence, GBV, and the role of women in peacebuilding. Encourage the appointment of gender experts in transitional justice mechanisms and support female-led organisations working with survivors.
- **Support the development of regional databases on civilian victims of war.** As part of this, ensure the collection of data on gender and ethnicity and the inclusion of survivors of sexual violence and children born of wartime rape.
- **Facilitate regional monitoring of state compliance with international legal obligations.** This should include the implementation of international court verdicts, UN resolutions, and European human rights standards related to reconciliation.
- **Support public awareness campaigns and regional dialogues that challenge patriarchal and violent narratives.** These should promote inclusive remembrance, and address masculinities in the context of war and peace.

## Recommendations to Civil Society Organisations and Think Tanks:

- **Foster cross-regional knowledge exchange.** Include other post-conflict societies to apply global best practices in transitional justice, documentation, and memorialisation.
- **Support and protect young peace activists.** This should apply especially to those challenging dominant narratives. Provide training on advocacy, media engagement, historical research, and digital security.
- **Enhance mental health and psychosocial support for activists and community workers involved in reconciliation processes.** Develop trauma-informed approaches and well-being programmes targeting youth and women.
- **Promote an interdisciplinary approach.** Foster critical and analytical assessments of the roots of nationalist ideologies that recognise the contributions of various actors – including the media and religious, cultural, and academic experts and institutions – in understanding the rise of nationalism in the 1990s and today.
- **Establish dedicated legal and emergency support funds.** This should include peace activists, whistleblowers, and victims' advocates facing threats, defamation, or retaliation.
- **Advocate for inclusive remembrance practices.** Ensure that the experiences of women, Roma, LGBTQIA+ persons, and other marginalised groups are recognised in public memory and education initiatives.



# 04

## GENDER AND DIVERSITY

## ***No convergence without equality: Gender equality and diversity is the cornerstone of democratic resilience and EU integration in the Western Balkans.***

### **Introduction**

Gender inequality remains a systemic barrier to EU convergence in the Western Balkans, undermining inclusive economic participation, democratic development, and social cohesion. While formal commitments exist on paper, meaningful implementation is lacking in practice. The political presence of women often remains symbolic, especially at the local level, with limited influence over decision-making. Young women and men are increasingly disillusioned with political participation, citing experiences of tokenism, harassment, and institutional exclusion.

The global rise in polarisation, digital authoritarianism, and economic precarity has accelerated in the region. Anti-gender movements, closely linked to democratic backsliding, are gaining momentum, normalising hate speech and targeting women, LGBTQIA+ persons, minorities, and human rights defenders through coordinated attacks, both online and offline. Technology-facilitated gender-based violence (TF-GBV) is on the rise across all Western Balkan countries, yet institutional responses remain fragmented and weak.

CSOs and gender advocates are increasingly constrained by shrinking civic space, political interference, and limited access to policy dialogue. While they work at the frontlines of social cohesion and rights-based governance, they are rarely meaningfully included in structural reform processes and continue to face chronic underfunding.

Against this backdrop, gender equality and minority rights protection can no longer be treated as a secondary concern – it is the cornerstone of peacebuilding, democratic resilience, and sustainable economic transformation in the region. Without serious, structural investment in gender equality and diversity as a cross-cutting priority in all EU-related processes, including the BP, the region's path toward EU norms and values will remain stalled, its democratic resilience weakened, and its promise of convergence unfulfilled.

### **Progress Check and Key Challenges**

As the BP enters its second decade, there is broadening recognition that gender equality and diversity are not peripheral – they are preconditions for democratic resilience, social cohesion, and sustainable development in the Western Balkans. The Gender Equality Forum within the Berlin Process 2024, held alongside the Leaders' Summit, offered a symbolic gesture toward progress. Yet for many civil society actors, it served more as window dressing than as a catalyst for change. Progress remains largely rhetorical, fragmented, and unaccountable. The absence of a dedicated regional gender monitoring mechanism continues to hinder progress-tracking, mutual learning, and enforcement. Despite high-level declarations, implementation of 2024 commitments remains underfunded, politically fragile, and disconnected from institutional reforms on the ground.

Some governments have adopted gender equality frameworks broadly aligned with EU standards. However, these gains remain fragile amid rising anti-democratic and anti-gender movements that actively influence legislation, roll back rights, and derail reforms. Gender equality is largely absent from high-level regional agendas, including the Growth Plan, CRM, and CEFTA dialogues, which lack gender-responsive budgeting, overlook the care economy, and ignore systemic exclusion of marginalised women. Gender Action Plan (GAP) III indicators and civic participation benchmarks are also missing.

Intersectionality is gaining visibility in discourse, through mentions of Roma, LGBTQIA+, youth, and disabled women, but implementation remains limited. Youth and women-led efforts in digital rights, care, and environmental justice gain traction but remain excluded from policymaking. The media and disinformation increasingly amplify anti-gender narratives as civic space shrinks.

At the local level, women, especially those affected by conflict, help rebuild social cohesion but often remain excluded from reconciliation processes and sustainable Women, Peace, and Security (WPS) financing. The 2024 recognition of gender-based violence as a regional security threat was a breakthrough, but implementation is inconsistent. While countries like North Macedonia and Serbia have advanced GBV legislation, regional harmonisation and access to protection remains uneven, particularly for migrant and asylum-seeking women lacking shelters, trauma-informed services, and legal aid.

Chronic underfunding and over-centralised gender financing, often channelled through large international actors, continue to marginalise grassroots feminist CSOs. Local governments lack disaggregated data and monitoring tools, limiting their ability to design responsive and accountable policies. The 2025 recommendations directly address these structural gaps, aligning with EU benchmarks and the urgent need for inclusive, coordinated reform.

Similarly, calls for the BP partners and the EU to establish clear benchmarks for monitoring reconciliation commitments have been discussed but not yet realised. Progress has been made, though, in ensuring consistent reporting on reconciliation efforts, as reflected in recent European Commission country reports and European Parliament resolutions, which hold Western Balkan governments accountable for actions undermining good neighbourly relations.

## Policy Recommendations

### Recommendations to WB6 Governments

- **Mainstream gender equality into all reform processes.** Integrate gender equality, care economy investments, and GBV prevention into the Growth Plan, CRM, green transition, and digital transformation agendas. All policy and strategy documents and action plans should undergo gender impact analysis and be aligned with the GAP III indicators.
- **Guarantee inclusive participation.** Institutionalise intersectional participation of women's rights CSOs – including those representing Roma, LGBTQIA+, youth, and rural women – in EU accession and domestic policymaking. Establish permanent national advisory bodies representing structurally marginalised groups, with decision-shaping authority in reforms.

- **Operationalise protection and prevention of GBV.** Harmonise national legislation with the 2024 EU Directive on combating violence against women and the Istanbul Convention, explicitly including TF-GBV. Train police, judiciary, and public servants on survivor-centred and trauma-informed response. Ensure universal access to legal aid, psychosocial support, and shelters, with targeted services for migrant and asylum-seeking women.
- **Activate local gender data systems.** Allocate national and donor funds for gender-disaggregated data collection on service access, digital safety, and GBV at the municipal level. Support community-based gender observatories to monitor policy implementation, enabling citizen accountability and local action.
- **Support gender-inclusive peace and reconciliation.** Invest in women-led, municipality-based reconciliation initiatives, particularly in post-conflict settings. Link local WPS action plans to regional peace dialogues and ensure stable, multi-year funding mechanisms.

### Recommendations to Berlin Process Partner Governments:

- **Support accountability and inclusion in the BP.** Champion the creation of a Gender Equality Scorecard with annual reporting by WB6 Governments and the RCC. Embed gender equality and diversity targets across all BP working groups, summits, and initiatives. Political and financial agreements must include gender conditionalities, with consequences for backsliding or institutional silence on rights violations.
- **Launch a BP Gender Innovation Fund.** This would support intersectional, CSO-led pilot initiatives and institutional reforms in areas like the care economy, reconciliation, digital inclusion, and local democracy. Ensure that the fund is transparent, participatory, and accountable to affected communities, with robust criteria for value-based project selection to ensure structural change.
- **Establish an independent Berlin Process Watchdog.** This would allow the monitoring of anti-gender legislation, institutional co-optation, and rights backsliding. It should be equipped with early warning capacity, regional visibility, and a mandate to trigger diplomatic or financial responses when core democratic and gender equality standards are violated, thus countering anti-gender and anti-democratic trends.

### Recommendations to EU Institutions and EU Member States:

- **Ensure conditionality and monitoring in the Accession Process.** Require comprehensive gender impact assessments, civic space indicators, and ensure meaningful GAP III alignment in all Instrument for Pre-accession (IPA) III and Growth Plan funding. Use screening chapters to assess progress on gender equality, disaggregated participation, and anti-discrimination enforcement, particularly in Chapters 23 and 24.
- **Fund feminist infrastructure.** Provide core, long-term institutional funding to feminist CSOs and independent gender research centres in the Western Balkans. Avoid over-reliance on international intermediaries by ensuring direct financing mechanisms for national and local women-led organisations, including those working with structurally excluded communities.



- **Advance legal and policy alignment.** Support the full transposition and operationalisation of the 2024 EU GBV Directive and the Istanbul Convention. Incentivise implementation through technical assistance and earmarked funding. Promote the localisation of the WPS Agenda with indicators tailored to post-conflict and reconciliation contexts.
- **Institutionalise gender equality in regional mechanisms.** Mainstream gender equality across CRM and Growth Plan frameworks, with disaggregated indicators, benchmarks, and monitoring tools that allow comparisons across WB6 countries and with EU norms. Establish a Regional Gender Equality Accountability Framework with strong, meaningful CSO co-governance and transparent reporting obligations.
- **Create platforms for learning and monitoring.** Facilitate structured peer learning between governments, CSOs, and gender experts on implementation of GAP III, CRM-related gender indicators, legislative harmonisation, and civic space protection. Strengthen cross-border cooperation on GBV prevention, digital safety, and legal guarantees for at-risk groups, including women on the move.

### **Recommendations to Regional and Intergovernmental Organisations:**

- **Mandate gender mainstreaming and civic participation in regional frameworks.** The RCC, South-East European Cooperation Process (SEECP), and regional networks like RYCO must embed gender equality, youth participation, and anti-discrimination safeguards into all regional frameworks, including the CRM Action Plan, Growth Plan coordination, digital and green transition agendas, and mobility programmes. Civil society, particularly women- and youth-led organisations, must have formalised entry points into regional agenda-setting and implementation.
- **Support feminist and youth-led knowledge production and cross-border campaigns.** Fund intersectional, community-rooted research and advocacy initiatives that link gender equality with media literacy, disinformation resilience, peacebuilding, and security advocacy. Prioritise the voices of youth, marginalised women, LGBTQIA+ persons, and migrant communities. RYCO and RCC should co-develop cross-border solidarity campaigns and safe digital spaces for rights-based civic engagement.
- **Coordinate regional monitoring on gender equality and backsliding.** Collaborate with national equality bodies, feminist CSOs and independent experts to establish a regional early warning and monitoring mechanism to track anti-gender legislation, institutional regression, and civic space restrictions. This mechanism should inform annual reporting and provide red flags for diplomatic and financial responses across the BP and EU pre-accession structures.
- **Advance a regional agenda for the care economy and inclusive labour markets.** Regional actors must support the development and replication of innovative care economy models, such as community-based services, cooperative childcare, and youth-led care, and in doing so ensure the participation of men. These should be backed by gender-responsive activation policies, fair labour standards, and targeted measures for underrepresented groups. The RCC, with South-Eastern Europe (SEE) Jobs Gateway and Employment and Social Affairs Platform (ESAP), should anchor care economy investment and inclusive labour measures in the Growth Plan and CRM implementation.



## Recommendations to Civil Society Organisations and Think-Tanks in the WB6:

- **Lead gender monitoring and advocacy in the Accession Process.** Establish CSO-led national governance boards and regional coordination mechanisms to monitor gender equality financing, public budgeting, and donor support. Strengthen local observatories and participatory tools to track rights implementation and institutional responsiveness, particularly in under-served areas.
- **Innovate and connect across borders.** Design and implement regional pilot initiatives focused on reconciliation, digital inclusion, care work, and the economic empowerment of marginalised women. Engage proactively in the Berlin Process Watchdog and contribute to early warning and accountability systems.
- **Mobilise collective action against backlash.** Document and publicly expose anti-gender and anti-democratic trends in legislation, media, and institutional practice. Build transnational alliances and movement-based solidarity to protect civic space, counter disinformation, and sustain a rights-based agenda within the BP and EU integration frameworks.



05

COMMON REGIONAL  
MARKET AND GROWTH

## ***A functional Common Regional Market could double WB6 economies in a decade, but only with political will and accountability***

### **Introduction**

The Common Regional Market (CRM) is central to the growth agenda of the Western Balkans. It is a key deliverable of the Berlin Process, designed to create a unified market of nearly 18 million people aligned with EU rules and standards.

By addressing market fragmentation, political barriers, and border inefficiencies, which cost the region significant growth potential, the CRM offers a pathway to boost competitiveness, attract investment, and prepare the Western Balkans for eventual EU integration.

Central to the CRM agenda is the free movement of goods, services, people, and capital, which directly enhances mobility, expands business opportunities, and opens new prospects for youth and skilled workers. However, successful implementation depends on political will, stronger institutions, and consistent enforcement of agreements, as unresolved disputes, protectionist practices, and weak capacities continue to hinder progress.

In late 2023 the EU unveiled a €6 billion Growth Plan making the CRM a core pillar of its Western Balkans strategy, with the potential to double the region's economy within a decade. Unlocking the full potential of the CRM requires the Western Balkans to prioritise private sector engagement and advance digital transformation.

Active involvement of civil society is equally important to ensure transparency, monitoring, and public awareness. For the EU, supporting the CRM is both a strategic and credibility imperative; it anchors regional stability, accelerates alignment with the Single Market, and delivers visible benefits of integration for governments, businesses, and citizens across the Western Balkans.

### **Progress Check and Key Challenges**

Since the 2024 Civil Society and Think-Tank Forum (CSF) and Berlin Process (BP) Summit, progress on the CRM agenda has been mixed, with limited progress. Overall, there remains a lack of significant advancement, largely due to ongoing political disputes and a persistent lack of genuine political will among key actors. However, some notable steps have aligned with CSF 2024 recommendations. In particular, the CSF 2024 emphasised the need for enhanced monitoring of Western Balkan countries' progress on CRM reforms. In response, the Regional Cooperation Council (RCC) has initiated the development of a monitoring mechanism and tools to track implementation of the CRM Action Plan 2025–2028, signalling a partial follow-up to this recommendation. In July 2025, the RCC unveiled the main elements of a CRM Monitoring Tool – an evidence-based system (with a live dashboard and annual report) designed to transparently track reforms across all CRM segments. The tool is a direct response to the need for evidence-based implementation, aligning CRM progress with the EU Growth Plan timeline.

Another key recommendation from CSF 2024 concerned the facilitation of regional economic cooperation and integration. In October 2024, the Central European Free Trade Agreement (CEFTA) Joint Committee adopted nine agreements designed to transform trade and economic cooperation across the region. These agreements aim to streamline business operations, generate employment opportunities, and improve consumer protection, marking a tangible step toward the realisation of the CRM.

Additionally, the CSF 2024 highlighted the importance of mobility and access to higher education. In line with this, the Agreement on Access to Higher Education and Admission to Study in the Western Balkans was signed in October 2024, regulating access to accredited public institutions across the Parties and enabling recognition of study rights – demonstrating a direct follow-up to CSF 2024 recommendations.

Despite these developments, civil society often feel sidelined by the main actors of the BP, including WB6 governments and EU institutions, which limits their ability to meaningfully contribute to the implementation and oversight of the CRM agenda. While some CSF recommendations have seen concrete action, such as monitoring mechanisms, CEFTA agreements, and higher education access, the overall pace of reform remains slow, and engagement with civil society is still insufficient.

## Policy Recommendations

### Recommendations to WB6 Governments

- **Enforce and institutionalise CRM commitments.** Prioritise the implementation of regional market agreements by strengthening institutional capacity and political will. WB6 governments should also dedicate skilled personnel and oversight mechanisms to ensure CRM agreements translate into tangible market integration.
- **Harmonise policies and remove protectionist barriers.** Align regulations and eliminate preferential practices that fragment the market. Governments should phase out biased public procurement and local-only quotas and standardise investment rules across borders. This unified approach will boost competition and allow businesses to operate seamlessly throughout the region.
- **Engage private sector and digitise the economy.** Expand support for businesses and technology. The CRM's success hinges on competitive local firms, yet current growth strategies overlook the role of the private sector. WB6 Governments must incentivise innovation, e-governance and digital infrastructure, enabling local companies to compete under EU-aligned standards and absorb new market opportunities.
- **Facilitate free movement and mutual recognition.** Remove political and administrative barriers to labour mobility. Crucial CRM reforms like the recognition of diplomas remain unimplemented (for example, Kosovo diplomas are not yet recognised in Serbia). Governments should immediately enact existing mutual-recognition agreements and lift trade barriers to allow people, goods and services to circulate freely.
- **Increase transparency and civil society engagement.** Publicise CRM action plans and involve CSOs and local authorities in oversight. Currently, citizens are largely unaware of CRM action plans and CSOs often feel sidelined. WB6 Governments should regularly publish progress reports, welcome independent monitoring, and hold open consultations. This builds trust, pressure for delivery, and local ownership of CRM reforms.

## Recommendations to Berlin Process Partners, EU Commission and EU Member States:

- **Maintain CRM as a strategic priority.** The EU should keep the CRM high on its agenda, signalling enduring commitment to Western Balkan integration and EU integration. Supporting the CRM is both a strategic and credibility imperative for the EU, anchoring regional stability and Single Market alignment.
- **Link support to rule of law and reform delivery.** Condition political and financial assistance on concrete CRM reform implementation and governance standards. EU partners must insist on accountability and anti-corruption in parallel with market liberalisation. Robust legal institutions are critical to CRM and growth policies; by insisting WB6 Governments uphold EU norms, the EU would uphold its values and ensure that funding yields real change.
- **Provide targeted aid to support implementation capacity.** Boost technical and investment assistance for enforcement and modernisation. The EU should channel funds and expertise towards digitalisation, e-services and business support (training SMEs on EU rules). For example, audits like the Western Balkans Investment Framework (WBIF) review could be extended, and grants for CRM-related infrastructure could be used to turn political agreements into functioning networks.
- **Promote civil society inclusion.** Require WB6 Governments to consult CSOs and think-tanks in CRM processes. EU institutions should take care not to repeat past mistakes where CSOs were sidelined. The EU should ensure that civil society has a formal seat at the table in preparation meetings and implementation reviews, which would reinforce transparency and democratic buy-in.
- **Support monitoring and accountability mechanisms.** Encourage the RCC and other bodies to publish periodic CRM implementation reports. The EU should back the RCC's new monitoring platform and insist on regular public updates on targets. Transparent metrics and benchmarks would empower stakeholders.
- **Plan for integration beyond CRM.** Use the BP to map steps towards full EU market integration. The CRM should not be the end of the road; the EU Commission needs to outline post-CRM pathways for WB6 firms into the wider EU Single Market. This could include expanding CEFTA/ Stabilisation and Association Agreement (SAA) alignment, pilot inclusion of WB industries in EU value chains, or new regional sector initiatives. Given the EU's stated goal of the WB6 countries being ready for enlargement by 2030, it is crucial to delineate how the Western Balkans can progressively integrate into European structures even before formal accession. Clear, phased EU accession incentives will sustain reform momentum.

## Recommendations to Regional and Intergovernmental Organisations:

- **Strengthen CRM monitoring and inclusivity.** The RCC should continue CRM tracking through its own platform and encourage civil society input. The RCC should formalise CSO participation in the monitoring process, ensuring that CSOs and private sector partners help define indicators and evaluate outcomes.
- **Facilitate harmonisation and CEFTA implementation.** The RCC should coordinate support for local authorities to execute regional trade agreements. The RCC should offer technical assistance and training to align national laws and procedures with agreed standards.

- **Promote broad stakeholder dialogue.** The RCC should convene regular regional forums that include governments, businesses, and civil society. Inclusive dialogue is needed to build social cohesion and address CRM barriers. By bringing all relevant actors into the conversation, the RCC could help tailor reforms to practical needs and preempt conflicts that stall integration.
- **Facilitate dispute resolution and trust-building.** The RCC should act as a mediator on unresolved bilateral issues undermining CRM. The RCC could help broker compromises on critical issues like diploma recognition or trade related challenges.
- **Mainstream sustainability and gender.** The RCC should ensure that growth strategies address regional energy interdependence and CO<sub>2</sub> reduction. At the same time, it should promote gender equality in CRM policies.

### **Recommendations to Civil Society Organisations and Think-Tanks in the WB6:**

- **Develop independent monitoring and accountability.** Create parallel CRM tracking tools and reports. With no official implementation report having been published in years, CSOs should gather evidence on reform progress (or lack thereof) to pressure governments. Publishing scorecards or case studies on CRM commitments would empower citizens and media to demand action and fill the oversight gap.
- **Raise public awareness of CRM benefits.** Explain technical reforms for citizens, as many people currently remain uninformed about the benefits and mechanisms of free mobility. CSOs should run outreach campaigns (social media, workshops) explaining how CRM initiatives (e.g. easier cross-border travel, shared consumer protections, etc.) improve everyday life. Broad public support would help counter resistance to reforms.
- **Coordinate regional networks of CSOs.** Form a WB6 civil society coalition on CRM issues. By linking CSOs, unions and experts across borders, CSOs could share best practice and present unified recommendations. Joint initiatives amplify impact and reduce duplication. A strong regional network would also overcome fragmentation when engaging RCC or EU partners, as seen in successful multi-country civil society platforms.
- **Produce data-driven research and policy proposals.** Fill information gaps with evidence. The absence of reliable data is a key hurdle, so think-tanks should conduct surveys, economic analyses and case studies on CRM-related topics. Well-documented research could underpin concrete policy proposals.
- **Push for inclusion in decision-making.** Demand formal CSO roles in the BP and regional forums. Past experience shows civil society has often been sidelined, so CSOs must insist on meaningful, not symbolic, engagement. By joining preparatory committees or consultations, CSOs ensure their insights inform regional action plans and hold leaders publicly accountable.



# 06

## ENVIRONMENT, ENERGY AND DECARBONISATION

## ***Environmental protection and decarbonisation is not optional: the Western Balkans must align green transition with social justice and EU standards***

### **Introduction**

The Western Balkans is at a critical juncture in its energy transition and environmental protection efforts. Progress is undermined by weak rule of law, exposing public resources to corruption and neglect. The Western Balkans needs stronger environmental and energy governance to tackle ongoing crises and accelerate EU Integration.

Extreme drought has dried up springs, threatening livestock and agriculture. Intensifying wildfires in the region, driven by record heatwaves, are putting forests, homes, and public health at risk. Air pollution remains dangerously high, while key biodiversity areas face growing threats from infrastructure and mining projects.

Coal still generates around 70% of electricity in the region, causing high pollution, thousands of premature deaths, and significant health costs. Phasing out coal, enforcing EU environmental standards, and preventing new high-emission projects are necessary steps toward sustainability. Energy poverty is widespread, particularly among rural and low-income households. Despite policy commitments, critical EU directives on environmental liability, emissions, and public participation are still poorly implemented.

Civil society has a vital role as a watchdog and bridge to communities. To be fair and lasting, the transition must actively include women and vulnerable groups, who are disproportionately affected by energy poverty, as well as youth, who seek green jobs and reasons to stay in the region. Addressing environmental and climate risks will also reduce migration pressures, making societies more resilient and inclusive for future generations.

### **Progress Check and Key Challenges**

The Western Balkans are at a critical moment in advancing energy transition and environmental protection while pursuing EU accession. Since CSF 2024, governments have pledged reforms and alignment with EU standards, but progress remains fragmented and often limited to formal commitments rather than systemic change. Weak institutions, political interference, and persistent corruption risks undermining the implementation of recommendations, while the space for civil society participation continues to shrink.

On the environment, CSO participation in the revision of the Green Agenda for the Western Balkans (GAWB) Action Plan has been limited and inconsistent, with many organisations excluded from working groups. While CSOs increasingly act as watchdogs by challenging low-quality Environmental Impact Assessments (EIAs), raising awareness, and filing legal complaints against harmful projects, their efforts remain underfunded and ad hoc. Governments have failed to reform environmental governance structures, with environment ministries still coupled to conflicting portfolios such as infrastructure, or tourism development, creating risks of policy



capture. Spatial and urban planning frameworks are unfit to guide sustainable, renewable expansion, leaving projects developer-led and vulnerable to land conflicts, biodiversity threats, and community opposition. Although the GAWB is increasingly referenced in EU progress reports, monitoring lacks clear benchmarks, timelines, and enforcement, while flawed socio-environmental assessments continue to allow damaging mining, hydropower, thermal power and infrastructure projects to advance.

With regards to energy and decarbonisation, CSOs are increasingly engaged in consultations and hearings, but participation remains largely symbolic, with short deadlines, limited data access, and minimal influence on final decisions. Governments have pledged compliance with EU directives, yet enforcement of EIAs, industrial emissions, and liability standards is partial, and many projects proceed without proper assessments or genuine consultation. EU and Energy Community support has focused on preparatory steps for the Carbon Border Adjustment Mechanism (CBAM) and Emissions Trading System (ETS) introduction, but concrete progress is lacking. Energy poverty remains widespread, with only fragmented donor-supported pilots on energy efficiency and solar photo-voltaic (PV) systems, lacking scale, coordination, and integration into formal strategies. Access to the EU Just Transition Fund (JTF) is still unavailable, leaving coal-dependent communities and vulnerable households without systemic support.

Cross-cutting challenges amplify these gaps. Decision-making in the energy transition is dominated by the Executive, with parliaments reduced to a largely symbolic role. Women and vulnerable groups remain underrepresented in policymaking despite facing higher exposure to climate-related issues and energy poverty. Youth are rarely included in transition strategies, and many continue to migrate in search of jobs, stability, and healthier environments, deepening the brain drain. Climate change impacts, floods, droughts, fires, and air pollution further exacerbate migration pressures by undermining community resilience. Meanwhile, media capture and disinformation distort public debate on energy and environment, portraying CSOs and environmental defenders as obstacles to development, which weakens public trust and reduces the quality of democratic participation.

## Policy Recommendations

### Environment

#### Recommendations to WB6 Governments

- **Integrate environmental and climate safeguards into all stages of economic growth and infrastructure development.** Too often, EIAs and Strategic Environmental Assessments (SEA) are rushed or symbolic, failing to provide real protection. Stronger consultation processes must be institutionalised to ensure that citizens and CSOs have a meaningful role.
- **Expand and properly manage protected areas, prosecute polluters, and ensure that mineral resources are accountably managed.** To prevent conflicts of interest, ministries of environment should be decoupled from portfolios that currently dominate policy agendas. Institutional capacity must be strengthened to ensure strategic planning, transparent investment, and compliance with EU environmental law.
- **Invest in new monitoring systems, control infrastructure, and enforce emission limits in order to tackle air and water pollution.** Monitoring systems should include unified datasets, harmonised protocols, quality assurance and

quality controls and open APIs. WB6 Governments should also transpose and fully implement EU directives on industrial emissions, Environmental Liability and Environmental Crimes.

- **Develop national climate adaptation strategies that explicitly address the vulnerabilities of women, youth, and communities at risk.** Climate-driven disasters such as floods, fires, and droughts expose local communities to severe economic and safety risks, as well as threatening their access to vital resources, requiring coordinated responses at both national and regional levels.

#### **Recommendations to Berlin Process Partner Governments:**

- **Promote technical dialogue between Western Balkan CSOs, youth, experts and their EU counterparts.** Currently, communication takes place mainly at the political level, which often oversimplifies messages and overlooks technical weaknesses in the region's environmental governance. Establishing technical expert-level exchanges would allow EU institutions and Member States to receive timely and reliable information about real challenges.

#### **Recommendations to EU Member States and the European Commission:**

- **Ensure that environmental protection is firmly embedded in the EU accession process.** The European Commission's Progress Reports should include systematic monitoring of the GAWB, with clear benchmarks, enforcement mechanisms, and structured opportunities for CSO participation. Governance reforms in WB6 countries should be tied directly to EU environmental financing, to ensure sustainability and accountability.
- **Support priority investments in wastewater treatment, solid waste management, reforestation, and pollution reduction.** Financial support should be linked to governance reforms that ensure investments deliver long-term benefits.
- **Adopt ecosystem accounting in national statistics and budget planning.** This should include piloting urban accounts first, such as air filtration, heat reduction, and noise buffering. Use the results of cost-benefit analyses for transport and energy projects and prioritise nature-based solutions in cities, so that Governments can make more informed and sustainable policy decisions.
- **Insist on higher standards for EIAs and SEAs in WB6 countries.** This would prevent projects that threaten biodiversity or protected areas from proceeding without appropriate impact assessments. CSOs must have guaranteed legal standing to challenge harmful projects in court, a right that is currently obstructed in some WB6 countries.

#### **Recommendations to Regional and Intergovernmental Organisations:**

- **Advance cooperation on biodiversity protection and cross-border environmental issues such as air and water quality.** Regional structures can play a coordinating role by developing joint biodiversity strategies and ensuring that environmental law is enforced regionally.

- **Develop independent monitoring mechanisms (Trackers) for Green Agenda implementation.** These mechanisms should be transparent and include gender, youth, and migration as cross-cutting themes, as well as pollution and greenhouse gases emissions (GHG), recognising their impact on environmental resilience. These could be fed by national agencies and CSO platforms, with public quarterly updates.
- **Launch a cross-border restoration initiative focused on degraded river corridors and wetlands.** Link biodiversity goals with flood-risk reduction and water security.

### **Recommendations to Civil Society Organisations and Think-Tanks in the WB6:**

- Strengthen the watchdog role of CSOs in monitoring government actions and ensuring compliance with environmental commitments. Challenge projects that threaten biodiversity and ensure meaningful participation in environmental assessments. Advocacy campaigns, litigation, and public awareness initiatives remain essential for holding authorities accountable.
- Build stronger partnerships with universities and regional networks. This would allow CSOs to enhance evidence-based advocacy, particularly on cross-border issues such as shared rivers and air pollution. Strengthen citizen science initiatives through dedicated funding to support community science engagement and bridge data gaps on environmental performance.
- Integrate gender mainstreaming, inclusion of vulnerable groups, and youth participation into advocacy on environmental governance. This should include combatting disinformation by working with the media to present accurate information on the benefits of environmental protection.

## **Energy and Decarbonisation**

### **Recommendations to WB6 Governments:**

- **Commit to a transparent and socially just energy transition that is fully aligned with EU climate and energy goals and international treaties.** This requires moving beyond declarations towards concrete timelines and targets, including the establishment of coal phase-out dates and a clear pathway for achieving climate neutrality. Expanding renewable energy capacity and upgrading cross-border grids is essential to secure energy security and reduce dependence on fossil fuels.
- **Support regulatory frameworks that encourage private and public investment.** This should include mechanisms such as tradable green certificates, modernised energy networks, and clear permitting processes.
- **Create dedicated energy efficiency funds to address household-level consumption.** These funds could support large-scale residential renovation programs, the introduction of smart metering systems, and flexible payment arrangements for vulnerable groups.
- **Introduce a robust monitoring, reporting, and verification (MRV) system.** This should include the gradual introduction of carbon pricing to avoid sudden economic shocks. Carbon pricing mechanisms should be aligned with the EU

ETS. At present, carbon pricing frameworks are absent from the region, making it urgent for governments to initiate stakeholder consultations on design and implementation. By adding a price on GHG emissions, fossil fuel-based energy becomes less attractive, incentivising both industry and households to pursue greater efficiency.

- **Tackle energy poverty.** Establish a WB6 Energy Poverty Facility to provide financing for rooftop solar systems, retrofitting homes, community heating solutions. This should focus particularly on rural households, women-headed households, and vulnerable groups. Programmes must address structural drivers of poverty across housing, labour, health, and gender.
- **Depoliticise state-owned utilities, strengthen regulators and ensure transparency in decision-making.** Governance reform remains essential to ensuring structural long-term progress in environmental protection and a just energy transition.
- **Create youth-focused local employment opportunities in renewable industries.** Youth engagement should be built into transition planning through advisory councils, apprenticeships, and green jobs programmes. Migration pressures could be addressed by creating local employment opportunities in renewable industries, reducing incentives for young people to leave.

#### **Recommendations to Berlin Process Partner Governments:**

- **Direct financial support and guarantees toward renewables, storage, energy efficiency, and interconnectors, excluding fossil fuels.** Assistance should also support gender-sensitive transition programmes and youth participation, ensuring women and young professionals are part of project design and implementation.
- **Focus technical aid on MRV and carbon pricing design, alongside transitional arrangements that protect households in energy poverty.** BP actors should open access to the EU JTF for WB6 countries, supporting coal-dependent regions and communities at risk of depopulation due to migration. Counter media narratives that spread disinformation on climate policies by supporting independent journalism and regional fact-checking initiatives.

#### **Recommendations to EU Member States and the European Commission:**

- **Treat energy transition as a precondition for deeper economic integration of the Western Balkans.** Redesign EU grant and loan financing frameworks for decarbonisation with greater diligence, transparency, and participation from stakeholders. Condition finance on the adoption of reforms that align WB6 with EU environmental Acquis, ensuring sound management of funds, and strengthening accountability.
- **Establish rule of law indicators specifically linked to the energy transition.** These should track measurable progress in areas such as compliance with Energy Community requirements, transparency of decision-making, public participation, and access to justice. Linking EU financial support to such indicators would provide both incentives and safeguards for reform.

## Recommendations to Regional and Intergovernmental Organisations:

- **Play a stronger role in coordinating reforms and ensuring inclusivity.** The absence of a centralised monitoring platform for energy transition commitments leaves progress fragmented. Establishing such a mechanism would enable systematic reporting on compliance with the BP and the Energy Community commitments.
- **Expand technical assistance to support the development of independent regulatory authorities and strengthen parliamentary oversight.** By ensuring that progress is measured consistently across the WB6, regional organisations can help build coherence and avoid duplication of donor-driven initiatives.

## Recommendations to Civil Society Organisations and Think-Tanks in the WB6:

- **Play a proactive role in monitoring, shaping and mainstreaming the (just) energy transition.** Continue to challenge weak or politically influenced EIAs and SEAs, ensuring that projects undergo rigorous scrutiny. Insist on early participation in consultations, rather than being confined to late-stage, symbolic engagement.
- **Pursue partnerships with universities, research bodies, and independent experts to build evidence-based advocacy.** Regional cooperation among CSOs should be strengthened to address shared challenges such as energy poverty, just transition planning, and access to critical raw materials.
- **Promote citizen-led solutions, including Renewable Energy Communities (REC), municipal renewable projects, and local just transition funds.** Enhancing public understanding of ETS, CBAM, and emissions reporting is critical in building trust in the transition.



