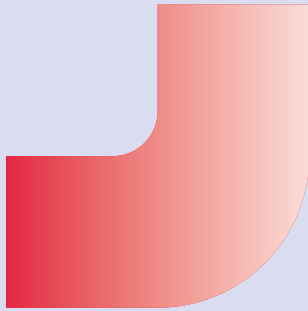


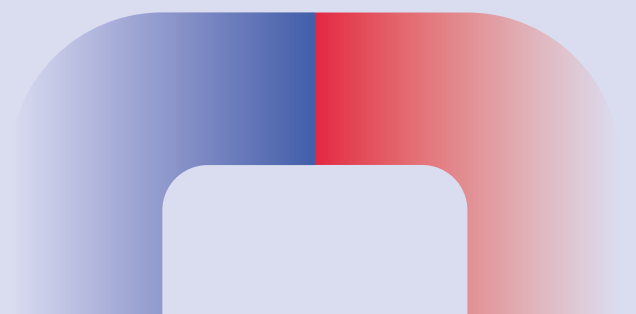


**Berlin  
Process  
Summit**  
2024  
10<sup>th</sup> Anniversary



# Civil Society & Think Tank Forum

**Final Reflections 2024-2025**



**About this publication:**

This publication was elaborated as part of the project “Civil Society and Think Tank Forum 2024” in the framework of the Berlin Process, implemented by the Southeast Europe Association and the Aspen Institute Germany with generous support by the German Federal Foreign Office.

In 2024, civil society organization and think tanks from all Western Balkan countries and from the EU developed comprehensive policy recommendations within seven thematic working groups. Rapporteurs from each working group drafted and presented recommendations at the Civil Society and Think Tank Forum in October 2024 and in advocacy meetings at all levels. The present collection of texts reflect on the Berlin Process 2024, noting where commitments or recommendations have been implemented or have faced challenges in order to offer a foundation for future hosts of the Berlin Process and the Civil Society Forum to build upon. The facts and opinions expressed in this publication do not reflect the views of the Southeast Europe Association, the Aspen Institute Germany, or the German Federal Foreign Office.

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The Southeast Europe Association e.V. (SOG) as an intermediary organization supports the political, scientific and socio-cultural exchange with as well as the analysis of South-east Europe. Institutionally supported by the German Federal Foreign Office, we have been one of the most important supporters of German foreign cultural policy since our foundation in 1952. We see it as the SOG's task to build bridges through our activities.

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## FOREWORD

In 2024, the Berlin Process marked its 10th anniversary. To commemorate this milestone, the Civil Society and Think Tank Forum (CSF) engaged a broad range of stakeholders through various activities designed to encourage constructive dialogue, fresh ideas, and actionable recommendations. Now, in 2025, the forum looks ahead to the next phase of the Berlin Process, which will be hosted by the United Kingdom. This fourth and final publication of the forum – organized by the Southeast Europe Association and the Aspen Institute Germany within the framework of Germany's 2024 chairmanship – offers reflections and sets the stage for the forum's continuation in 2025 and beyond.

As civil society reviews last year's progress within the Berlin Process, the following papers present reflections by the rapporteurs of the 2024 Civil Society and Think Tank Forum. These rapporteurs led seven thematic working groups addressing a wide range of topics. Their papers begin with an analysis of the key statements and commitments outlined in the 2024 Berlin Process declaration. As independent experts from the Western Balkans, their assessments provide valuable insight into the implementation status of these commitments. Furthermore, the rapporteurs offer detailed perspectives on the recommendations, which civil society made during 2024, highlighting those that have been adopted and the ways they have influenced policy. These recommendations, first shaped at the Preparatory Forum in July 2024, were discussed in various forums, including high-level dialogues during the Berlin Process Summit. Where last year's recommendations have gained traction, the papers shed light on both opportunities and the challenges that remain.

Looking ahead, the papers offer a strong foundation for sustained civil society engagement in the Berlin Process. They propose concrete ideas for the 2025 cycle, including urgent topics that require attention. Additionally, the authors reflect on the process itself,

suggesting areas in need of evolution and improvement. Their ideas build upon last year's recommendations and the comprehensive review, "Ten Years of the Berlin Process," commissioned by the 2024 Civil Society and Think Tank Forum.

The Civil Society and Think Tank Forum has provided a vital platform to amplify grassroots, independent, and critical voices. The dialogues in 2024, which brought together representatives from over 125 civil society organizations, generated fresh thinking aimed at driving progress in the Western Balkans. High-level participation – from German Chancellor Olaf Scholz, European Commission President Ursula von der Leyen, and U.K. Minister of State Stephen Doughty MP – underscored the importance of civil society in the Berlin Process and created a rare opportunity for direct exchange with decision-makers.

While civil society has successfully elevated many pressing issues, several policy areas remain insufficiently addressed within the Berlin Process and must be incorporated into future discussions. The following reflections summarize the process and key findings from the extensive engagement with civil society and relevant stakeholders, all committed to advancing sustainable cooperation in the Western Balkans. Although civil society's recommendations have gained notable momentum, further expanding its role in shaping the region's development remains essential.

This important work would not have been possible without the dedication of many individuals. The Southeast Europe Association and Aspen Institute Germany, as co-organizers of the 2024 Civil Society Forum, extend their gratitude to all experts and participants who contributed to shaping policy proposals. Special thanks go to the rapporteurs for their close collaboration and thoughtful feedback. Finally, the organizers wish to express their sincere appreciation to the German Federal Foreign Office for its generous financial support.

The Southeast Europe Association and Aspen Institute Germany hope that this final report, along with previous publications from the 2024 forum, will serve as a strong foundation for continued cooperation between civil society organizations and governments. Building on this progress, the organizers of the 2025

Civil Society Forum, together with the British Council and the U.K. Berlin Process hosts, are well positioned to develop a new agenda – one that both revisits ongoing issues and tackles emerging challenges to support the positive evolution in the Western Balkans.



**Dr. Christian Hagemann**  
Executive Director  
Southeast Europe Association



**Dr. Stormy-Annika Mildner**  
Executive Director  
Aspen Institute Germany

# EU INTEGRATION AND THE BERLIN PROCESS

**Rapporteurs:** Zoran Nechev, Anamarija Velinovska | Institute for Democracy “Societas Civilis” – Skopje (IDSCS)

## Outcomes of the Berlin Process Summit 2024

The Berlin Process Summit 2024 reaffirmed the European Union’s (EU) commitment to the Western Balkans, emphasizing economic integration, governance reforms, and the Common Regional Market (CRM) as key elements for advancing EU accession. The Chair’s Conclusions of the Berlin Process Summit 2024 highlight several critical areas of progress and remaining challenges.<sup>1</sup>

The Chair’s Conclusions 2024 made a direct link to the recommendations provided by the Civil Society and Think Tank Forum (CSF). On the topic of “Democracy and Strong Institutions,” acknowledging the CSF 2024, the signatories noted the need for “focusing on expanding local ownership, improving monitoring, and increasing visibility through Civil Society Organizations-led communication, fostering bottom-up approaches and active participation of local actors.”<sup>2</sup> The above-mentioned statement encompasses many of the provided recommendations by the working group on “EU Integration and the Berlin Process.”

In addition, the Chair’s Conclusions put emphasis on the CRM and the Growth Plan for the Western Balkans. The Chair’s Conclusions stated that “The participants emphasized the need for increased regional cooperation through the CRM, which is an integral part of the Growth Plan for the Western Balkans, as the key to promoting economic growth and improving living conditions in the region.”<sup>3</sup> The CRM and the Growth Plan remain crucial for implementing reforms and regional cooperation.

## Implementation and Consideration of Civil Society and Think Tank Forum 2024 Recommendations

### Status of 2024 Recommendations for Civil Society Organizations (CSOs):

During advocacy meetings, multiple stakeholders acknowledged the value of civil society organization (CSO)-led monitoring efforts in line with the recommendation to “Strengthen regional CSO cooperation and advocacy efforts to monitor CRM implementation.” However, there is still no formalized role for CSOs in the official CRM monitoring framework. Public transparency is also critical; civil society must therefore advocate for publicly accessible reports that provide a clear picture of progress, challenges, and necessary policy adjustments. Without an inclusive and transparent monitoring process, the effectiveness of regional cooperation efforts will be significantly undermined.

Civil society organizations are increasingly aligning their programming with the Berlin Process priorities, including advocacy efforts related to the CRM. For example, initiatives supported by regional donors such as the Western Balkans Fund and EU-funded projects have encouraged CSOs to tailor their work toward economic integration and regional cooperation.<sup>4</sup> To build on this momentum, advocacy toward international donors should intensify, particularly to secure long-term support for CRM-related initiatives that focus on transparency, accountability, and inclusive economic reform.

### Status of 2024 Recommendations for Western Balkan Governments:

National governments have made some progress on the recommendation to “target reforms that would unlock financial incentives by the EU, thereby fostering institutional participation,” particularly regarding CRM

1 Berlin Process, Chair’s Conclusions, 2024, [https://www.berlinprocess.de/uploads/documents/chairs-conclusions-2024\\_1728992421.pdf](https://www.berlinprocess.de/uploads/documents/chairs-conclusions-2024_1728992421.pdf) (accessed March 28, 2025).

2 Ibid., p. 3

3 Ibid., p. 3

4 Western Balkans Fund, Call for Proposals: Supporting regional cooperation and development in the Western Balkans, January 27, 2025, <https://westernbalkans-infohub.eu/calls/western-balkans-fund-call-for-proposals/> (accessed April 28, 2025).



implementation and reform agendas.<sup>5</sup> Since the start of the year, the first financial incentive for North Macedonia through the Growth Plan instrument has been delivered.<sup>6</sup> However, the implementation remains vital. Bureaucratic inefficiencies, lack of coordination between institutions, and political instability continue to hinder comprehensive reform efforts.

European stakeholders agreed on the necessity of the recommendation to “Deliver on Common Regional Market (CRM) goals to unlock Growth Plan potential opportunities” and foster deeper regional trade cooperation. While the CRM provides a framework for economic integration, practical implementation requires removing non-tariff barriers and adjusting customs procedures to facilitate trade. Strengthening regional supply chains and diversifying economic activities should remain a priority for Western Balkan governments, supported by targeted EU assistance programs.

#### **Status of 2024 Recommendations for Berlin Process Partners and the European Union:**

The recommendation, “Enhance administrative capacities and alignment in the WB6 with EU policies related to the BP,” was discussed with several interlocutors. Meetings with EU institutions and German interlocutors have reaffirmed the critical role of structured financial and policy support in ensuring long-term success for the CRM and Growth Plan for the Western Balkans. European stakeholders have highlighted the need for improved administrative capacities within Western Balkan institutions, emphasizing capacity-building programs that align national policies with EU standards. Technical assistance and funding mechanisms should be streamlined to ensure that national administrations can efficiently absorb EU funds and implement necessary reforms.

A key takeaway from the advocacy meetings and other discussions is the necessity of the recommendation to “reintroduce rule of law mechanisms into the Berlin Process agenda,” as stronger rule of law frameworks are a prerequisite for accessing financial incentives under the Growth Plan. Rule of law reforms should not be seen as separate from economic

initiatives but rather as a fundamental component that ensures investment security and institutional credibility. Enhanced judicial independence and anti-corruption measures will be necessary to strengthen regional economic resilience and encourage foreign direct investment.

## **Priorities for the Berlin Process and Civil Society Forum in 2025**

### **Civil Society Forum 2025:**

In 2025, the CSF should be a dynamic and inclusive platform that goes beyond traditional advocacy and actively drives change within the Berlin Process framework. It should be a space where CSOs are not only discussing issues but also directly participating in the monitoring and evaluation of commitments made under the Berlin Process and the Growth Plan.

Furthermore, the CSF must bring attention to the rule of law, democracy, and good governance as central pillars of the regional framework, ensuring that these values are consistently addressed in all discussions and agreements.

The CSF should work to empower citizens, especially those from marginalized communities, by ensuring their voices are included in policy dialogues. It must promote the active involvement of local communities in the decision-making process, fostering a sense of ownership over regional reforms. Additionally, the CSF should advocate for increased funding for civil society-led initiatives that focus on monitoring and accountability, providing an extra layer of transparency for regional commitments.

Journalists and civil society organizations must play a key role in communicating developments, especially regarding the CRM, through accessible and citizen-focused messaging. The Civil Society Forum 2025 should seek opportunities to help CSOs create effective messages explaining progress made in key initiatives.

5 Südosteuropa-Gesellschaft and Aspen Institute Germany, Civil Society & Think Tank Forum 2024: Policy Recommendations, October 2024, p. 7, [https://www.berlinprocess.de/uploads/documents/berlin-process-civil-society-think-tank-forum-2024-policy-recommendations\\_1729069924.pdf](https://www.berlinprocess.de/uploads/documents/berlin-process-civil-society-think-tank-forum-2024-policy-recommendations_1729069924.pdf) (accessed April 28, 2025).

6 European External Action Service, North Macedonia First Country to Receive Pre-Financing Under the Growth Plan, March 3, 2025, [https://www.eeas.europa.eu/delegations/north-macedonia/north-macedonia-first-country-receive-pre-financing-under-growth-plan\\_en](https://www.eeas.europa.eu/delegations/north-macedonia/north-macedonia-first-country-receive-pre-financing-under-growth-plan_en) (accessed April 28, 2025).

**Berlin Process 2025:**

The CRM remains central to regional economic cooperation, serving as a steppingstone toward deeper EU integration. The Growth Plan provides a financial and policy framework that complements the CRM's objectives. However, ensuring that the CRM delivers on its full potential requires clearer institutional and policy alignment which the Berlin Process should encourage in 2025. National governments must work to integrate CRM goals into their domestic economic policies, ensuring effective coordination between ministries and regional organizations. Additionally, operationalizing the Growth Plan requires greater transparency from the European Commission regarding eligibility criteria and implementation timelines for financial incentives.

In 2025, the Berlin Process should consider establishing a structured mechanism to track CRM and Growth Plan progress, increase accountability, and ensure that commitments translate into concrete actions. Effective communication strategies remain essential to reinforcing public trust and engagement in regional initiatives. Currently, communication efforts are fragmented and public awareness of CRM benefits remains low. Governments and regional organizations should use the Berlin Process in 2025 to develop a coordinated public information strategy, in collaboration with journalists and CSOs, that highlights the tangible benefits of the CRM, thereby fostering greater citizen awareness. Additionally, the creation of interactive digital platforms to track CRM and Growth Plan milestones would provide real-time updates and allow for public feedback, which would further strengthen engagement.

Predictability is crucial to maintaining momentum in regional cooperation. The Berlin Process in 2025 should encourage regular consultations with civil society embedded in every stage of CRM and Growth Plan discussions, fostering sustained dialogue between decision makers and non-governmental actors. Furthermore, the Berlin Process 2025 must help Western Balkan governments to remain committed to stability and policy consistency, preventing setbacks due to political transitions or external pressures that could weaken implementation efforts. This can be achieved by institutionalizing multi-annual agendas, establishing Berlin Process assessment mechanisms to evaluate and reward policy consistency, and ensuring that annual commitments translate into actual reforms for the benefits of the citizens. Moreover, the Berlin Process should promote

inclusive policy dialogues that involve opposition parties and civil society actors, fostering cross-party consensus and resilience against political volatility.

Discussions at the Berlin Process 2025 Summit should make removing non-tariff barriers and adjusting customs procedures, strengthening regional supply chains, and diversifying economic activities a priority for Western Balkan governments. This priority should be supported by targeted EU assistance programs.

Looking ahead, future cooperation between the Western Balkans and Berlin Process partner countries should focus on ensuring that reforms are not just adopted but fully implemented. Clear benchmarks, measurable results, and regular evaluations will be necessary to maintain momentum and credibility. The U.K. as the next Berlin Process host should refine the already existing recommendations, reinforce commitments, and ensure that regional integration remains a top priority for decision makers.

This reflection underscores the need for stronger implementation mechanisms, enhanced monitoring alignment, and a comprehensive communication strategy to maximize the impact of CRM and the Growth Plan. As preparations for the CSF 2025 advance, these recommendations should serve as guiding principles to reinforce regional cooperation and ensure that civil society remains an active driver of progress.

# DEALING WITH THE PAST AND RECONCILIATION

**Rapporteurs:** Sofija Todorović, Zorana Milovanović, Ivana Nikolić | Youth Initiative for Human Rights Serbia

## Outcomes of the Berlin Process Summit 2024

From the perspective of dealing with the past and reconciliation, the 2024 Joint Declaration on Reaffirming Good Neighbourly Relations and Regional Cooperation represented a significant step forward for the Western Balkans (WB), particularly in terms of confronting and addressing the region's painful legacy. The declaration's acknowledgment of the need to "face the legacies of the past" was a critical commitment, signaling a collective recognition of the unresolved issues that continue to affect the relationships between the countries.<sup>1</sup> The pledge to actively engage in reconciliation, resolve the fate of missing persons, and settle outstanding bilateral disputes through dialogue marked a meaningful move toward healing long-standing wounds.<sup>2</sup>

The declaration also underscored the importance of resolving these issues peacefully and emphasized the role of regional cooperation. By rejecting divisive narratives and urging states to refrain from blocking each other's European Union (EU) integration paths, the declaration aligned with the broader goals of the Berlin Process: fostering good neighborly relations, building trust, and creating a cooperative environment conducive to reconciliation. Moreover, the support for youth exchange initiatives such as the German-Polish Western Balkans initiative demonstrated a clear commitment to bridging divides between younger generations, who will play a key role in shaping the future of the region.

Overall, this declaration was a stellar achievement of the Berlin Process 2024 which reaffirmed the commitment to reconciliation, emphasizing that the path toward a peaceful and prosperous future for the region lies in mutual respect, dialogue, and cooperation – principles that lie at the heart of the Berlin Process.

## Implementation and Consideration of Civil Society and Think Tank Forum 2024 Recommendations

Since the policy recommendations on the topic of dealing with the past were published less than six months ago, the implementation of many specific recommendations has yet to begin. Mostly international actors and stakeholders have already started working on implementing some of the most crucial recommendations, while actions in this direction by local actors are still lacking.

### Status of 2024 Recommendations for Civil Society Organizations (CSOs):

Unfortunately, the recommendations formulated towards CSOs remain for the most part unimplemented, largely due to the current difficult working environment of CSOs in the region.

The recommendations primarily focused on addressing the statelessness of the Roma population, a lingering consequence of the conflicts in the 1990s, and advocated for investment in a new generation of Roma researchers and Roma-led research on the 1990s wars and the Roma genocide during World War II. Additionally, the recommendations called for an expansion of financial support for addressing the past and fostering reconciliation, with a particular emphasis on local non-governmental organizations (NGOs) and media outlets.

It is important to underscore that the effective implementation of these recommendations necessitates sufficient time and thorough consideration. Furthermore, it is critical to acknowledge that CSOs throughout the region are grappling with substantial challenges due to severe financial constraints, primarily resulting from funding cuts under the new U.S. administration. These financial limitations are significantly hindering the capacity of the civil society sector, thereby limiting their ability to effectively address the

1 Berlin Process, Joint Declaration on Reaffirming Good Neighbourly Relations and Regional Cooperation on the Occasion of the 10<sup>th</sup> Anniversary of the Berlin Process, p. 2, 2024, [https://www.berlinprocess.de/uploads/documents/joint-declaration-on-reaffirming-good-neighbourly-relations\\_1728992512.pdf](https://www.berlinprocess.de/uploads/documents/joint-declaration-on-reaffirming-good-neighbourly-relations_1728992512.pdf) (accessed March 20, 2025).

2 Ibid., p. 2.

issues outlined in the recommendations and jeopardizing the sustainability and future of the sector. A few CSOs across the region – whose names are withheld out of respect for their privacy – have been forced to scale back their activities due to limited funding resulting from USAID budget cuts.

### **Status of 2024 Recommendations for Western Balkan Governments:**

Although most of the recommendations in the field of reconciliation were directed at Western Balkan governments, the main issue lies in their lack of feedback: namely, their unwillingness to engage in dialogue around the recommendations. Of course, there were notable differences among the Western Balkan 6 (WB6): some countries, like Kosovo and Montenegro, were receptive. Others, like Bosnia and Herzegovina, were partially open, while Serbia showed no willingness to even hear the recommendations. This is further evidenced by the fact that Serbia's then Prime Minister Miloš Vučević did not attend the discussion with the working group leads at the Berlin Process Summit in Berlin in October 2024.

Several significant political and social developments across the region continue to negatively influence governments' positions on dealing with the past and reconciliation. In Serbia, for instance, amid an ongoing smear campaign against CSOs and the most significant political crisis in a decade, the Serbian government appears unwilling to collaborate with civil society or seriously consider the recommendations aimed at advancing reconciliation and addressing the past.<sup>3</sup>

Amid a major political crisis in Bosnia and Herzegovina, the Srebrenica Memorial Center has temporarily closed due to security concerns – a significant setback for reconciliation efforts. In Republika Srpska, the Serb-dominated entity, authorities passed a foreign agents law, while a similar draft is set to be discussed in the Serbian Parliament. However, in November 2024, Radislav Krstić – the wartime commander of the Bosnian Serb Army's Drina Corps,

currently serving a 35-year sentence for aiding the Srebrenica genocide – publicly admitted guilt and asked victims' families for forgiveness.<sup>4</sup>

In North Macedonia, a tragic nightclub fire in Kočani that claimed 61 lives sparked nationwide protests and led to the arrest of several state officials. Political turmoil is also unfolding in Albania, where multiple officials have been arrested or are under investigation for corruption and money laundering. Meanwhile, in Montenegro, the Special State Prosecutor's Office reopened four war crimes cases from the 1990s, offering a glimmer of hope to victims and their families.<sup>5</sup>

In Kosovo, parliamentary elections were held in early February, marked by disinformation campaigns – some reportedly orchestrated from Belgrade and the Kremlin – along with hate speech and divisive, ethno-centric narratives. Some of this disinformation fueled fears of inter-ethnic violence and the possibility of a renewed conflict between Serbia and Kosovo.<sup>6</sup>

Some recommendations focused on encouraging the media to uphold ethical standards, implement strong editorial policies to counter hate speech, antigypsyism, and false narratives about the past, and introduce local regulatory mechanisms that would introduce penalties for violations of ethical codes. However, these recommendations have yet to be implemented. In many countries, the media continues to fuel hatred and ethno-centric narratives, while also targeting independent outlets, civil society organizations, foreigners, and others.

Recommendations calling for the revision of national education curricula to include comprehensive and balanced accounts of the past have also not been implemented. Likewise, the recommendation urging local governments to replace inflammatory narratives about the 1990s wars with internal dialogue and bilateral discussions remains unaddressed, particularly in the cases of Serbia-Croatia and Serbia-Kosovo relations.

3 Ivana Nikolic, Dossier Croatia: Coordinated Hate. Human Rights Violations Against Croatian Citizens and the Promotion of Hatred During the Political Crisis in Serbia (December 2024 - February 2025), Youth Initiative for Human Rights, March 14, 2025, <https://yih.rs/wp-content/uploads/2025/03/Dossier-Croatia-ENG-5-min.pdf> (accessed March 20, 2025).

4 Lejla Memcic, Bosnian Serb Wartime General Admits Guilt for Srebrenica Crime, BIRN, November 13, 2024, <https://balkaninsight.com/2024/11/13/bosnian-serb-wartime-general-admits-guilt-for-srebrenica-crime/> (accessed April 17, 2025).

5 Borislav Visnjic, Reopened War Crimes Cases Offer Some Hope of Justice in Montenegro, BIRN, February 12, 2025, <https://balkaninsight.com/2025/02/12/reopened-war-crimes-cases-offer-some-hope-of-justice-in-montenegro/> (accessed April 17, 2025).

6 Hate Speech and Disinformation During the 2025 Election in Kosovo, BIRN Kosovo, April 2025, <https://drive.google.com/file/d/1is1FuOB4zImsCfHeKJOCOEAtFNvcWjwl/view> (accessed April 17, 2025).

The working group also recommended that Western Balkan governments build a culture of recognition of war crimes and reduce misinformation by supporting ethical codes in media and funding media and digital literacy efforts. Having in mind the above-mentioned developments as well as reports produced by CSOs beyond the region, it is obvious these recommendations have not yet been fully met. War criminals are still dominant in the public realm, but there have been slight improvements. Following a complaint filed by the Youth Initiative for Human Rights (YIHR), the Commissioner for the Protection of Equality has recommended that the Čuprija Cultural Institution immediately suspend its mural competition dedicated to convicted war criminal Nebojša Pavković.<sup>7</sup>

Overall, there has been little progress, aside from a few isolated cases mentioned earlier. Issues related to dealing with the past and reconciliation have been sidelined in favor of other major developments outlined in the text. A culture of denial continues to prevail, along with inadequate memorialization of wartime events. Notably, progress has been more evident at the international level, where CSO reports, individual meetings, debates, and other advocacy efforts have been particularly active and impactful.

### **Status of 2024 Recommendations for Berlin Process Partners and the European Union:**

These stakeholders have taken steps to ensure consistent reporting concerning how the Western Balkan Six governments address dealing with the past and reconciliation. It is especially important to react adequately whenever any of the WB6 governments glorify war crimes or criminals, engage in historical revisionism, act contrary to good neighborly relations or promote exclusionary narratives. The latest European Commission (EC) country reports serve as a clear example of this recommendation being implemented, as do numerous interviews and press releases from EU representatives, particularly regarding countries engaging in actions contrary to good neighborly relations.<sup>8</sup>

For instance, the EC called on Serbia and Kosovo “to demonstrate more serious and constructive commitment to advance the normalisation process. Moving forward, Serbia and Kosovo also need to make further substantial efforts to avoid actions that undermine stability and rhetoric that is not conducive to dialogue and reconciliation.”<sup>9</sup>

While the recommendation for the Berlin Process partners and the European Union (EU) to establish clear benchmarks and indicators for measuring the implementation of commitments on reconciliation was discussed, no immediate progress has been made yet. If implemented, this measure would allow for effective tracking of progress in how countries are dealing with the past, as outlined in the recommendations.

## **Priorities for the Berlin Process and Civil Society Forum in 2025**

### **Civil Society Forum 2025:**

In general, the structure of the Civil Society Forum as part of the Berlin Process should remain largely intact. However, it is essential to ensure equal representation of Civil Society Organizations from each of the six Western Balkan countries. In 2024, the absence of the invited representative from Albania in the Working Group discussions on dealing with the past significantly hindered the ability to adequately address and incorporate the Albanian perspective. To avoid such gaps in the future, it is crucial that CSOs from every WB6 country have a full and active presence in the forum discussions on different topics. Additionally, it would be beneficial to ensure even more active participation of younger generations engaged in the dealing with the past and reconciliation processes. Their perspectives are invaluable, as they offer fresh insights and a long-term view on regional stability and cooperation. Involving younger generations in various ways would contribute to fostering a deeper, more inclusive dialogue that reflects the concerns and aspirations of those who will ultimately shape the future of the region.

<sup>7</sup> Youth Initiative for Human Rights Serbia, Commissioner for the Protection of Equality Recommends Immediate Suspension of the Competition and Creation of Mural of Nebojša Pavković in Čuprija, April 15, 2025, <https://yih.rs/en/commissioner-for-protection-of-equality-recommends-immediate-suspension-of-the-competition-and-creation-of-mural-of-nebojsa-pavkovic-in-cuprija/> (accessed April 17, 2025).

<sup>8</sup> European Commission, Enlargement Reports 2024: Commission Outlines Progress and Priorities for Candidate Countries, October 30, [https://commission.europa.eu/news/enlargement-reports-2024-commission-outlines-progress-and-priorities-candidate-countries-2024-10-30\\_en](https://commission.europa.eu/news/enlargement-reports-2024-commission-outlines-progress-and-priorities-candidate-countries-2024-10-30_en) (accessed March 20, 2025).

<sup>9</sup> European Commission, Serbia 2024 Report, October 30, 2024, [https://enlargement.ec.europa.eu/document/download/3c8c2d7f-bff7-44eb-b868-414730cc5902\\_en?filename=Serbia%20Report%202024.pdf](https://enlargement.ec.europa.eu/document/download/3c8c2d7f-bff7-44eb-b868-414730cc5902_en?filename=Serbia%20Report%202024.pdf) (accessed April 17, 2025).



**Berlin Process 2025:**

The Berlin Process in the future must address the gender dimension of peacebuilding and highlight the invaluable contributions of activists and experts who, despite numerous challenges, continue to collaborate. Moreover, to enhance inclusivity, it is essential for the Berlin Process to specifically call attention to the threats and smear campaigns targeting those working on transitional justice while also recognizing the positive impact they have in fostering trust within divided societies. In the context of this new world order, digital and geopolitical trends are also critical to the process of dealing with the past. Specifically, the issue of international justice must be addressed, with a strong emphasis on improving the efficiency of national court proceedings.

The current political situation in the Western Balkans highlights the urgent need for regional governments to collaborate in building a just and peaceful future. Despite numerous recommendations, the lack of commitment from governments as well as the political crisis in Serbia, Bosnia and Herzegovina, and Kosovo hinders progress. To overcome past divisions and ensure stability, it is critical for WB6 governments to prioritize cooperation, accountability, and reconciliation, as laid out in the 2024 recommendations. These situations further underscore the importance of the recommendation to involve Croatia in projects focused on dealing with the past and reconciliation with the WB6 countries within the Berlin Process and to leverage the Berlin Process as an additional platform for advancing bilateral relations between Serbia and Kosovo.

Looking ahead, the Berlin Process must evolve to become more inclusive, extending beyond CSOs to ensure greater participation from the WB6 national governments. These governments should be actively engaged, with a proactive role in discussions and a commitment to addressing the recommendations. To make this a reality, in 2025 the Berlin Process should include concrete steps to strengthen institutional exchange and firmly establish itself as a platform for meaningful dialogue between CSOs and governments, especially given the ongoing reluctance of some local governments to engage with civil society.

Additionally, the Berlin Process must incorporate stronger mechanisms for accountability and progress monitoring, ensuring transparent dialogues and holding all stakeholders to their commitments. Clear

benchmarks and indicators should be established to track progress, fostering a results-oriented and sustainable approach to regional cooperation and development. This should be operationalized by CSOs in the region with expertise and long-standing experience in overseeing transitional justice processes to make the entire effort more measurable and effective.

# GENDER AND DIVERSITY

Rapporteur: Tania Ivanova | Reactor – Research in Action

## Outcomes of the Berlin Process Summit 2024

The 2024 Berlin Process Summit marked a significant milestone in advancing gender equality and diversity within the Western Balkans, introducing several noteworthy developments.

For the first time in its history, the Berlin Process introduced the Gender Equality Forum and committed to evaluate its permanent institutionalization within the Berlin Process, ensuring ongoing dialogue, monitoring, and strategic development on gender issues.<sup>1</sup> The Berlin Process Summit also acknowledged the need for sustainable funding by committing to explore the creation of a regional financing mechanism dedicated to gender equality initiatives.<sup>2</sup> This initiative would provide sustainable financial resources to address gender disparities effectively, thereby strengthening the capacity of both state and civil society actors to advance gender equality in tangible ways.

The summit also emphasized the importance of integrating gender perspectives across all sectors as well as ensuring that all initiatives targeting the new Common Regional Market Action Plan 2025-2028 (CRM) are gender mainstreamed.<sup>3</sup> This move explicitly linked women's economic empowerment with broader regional growth and EU convergence goals. It recognized that closing gender gaps in employment and entrepreneurship can unlock substantial economic potential for the region and significantly boost GDP.

In addition, the Declaration on Higher Education included a key introductory pledge to implement its provisions transparently and without discrimination on the basis of gender, ethnicity, age, sexual orientation, disability, or other grounds.<sup>4</sup>

## Implementation and Consideration of Civil Society and Think Tank Forum 2024 Recommendations

A significant contribution of the Civil Society and Think Tank Forum (CSF) 2024 was its integration of gender and diversity as cross-cutting priorities. This approach is particularly important in the current context of democratic backsliding and rising anti-gender movements in the Western Balkans, as it reinforces the role of inclusion as a foundational principle of regional cooperation and democratic resilience. The CSF 2024 introduced the first dedicated regional working group on “Gender and Diversity,” which reaffirmed the vital role of gender equality and of the inclusion of diverse societal groups in building resilient and democratic societies in the Western Balkans. This marks a major step toward ensuring sustained attention and structured dialogue on gender and diversity-related issues.

While these commitments represent clear progress, their impact will depend on effective implementation, political will, and the ability to safeguard gender equality frameworks from rising illiberal tendencies in the region. The Berlin Process has both the tools and the momentum to embed gender equality at the core of its transformative agenda – but turning commitments into action remains the next crucial test.

### Status of 2024 Recommendations for Civil Society Organizations (CSOs):

Throughout the CSF 2024, civil society actors underscored the need for strategic communication efforts to counter misinformation and shift public perception in favor of gender equality.

In this area, CSOs have made progress by building regional networks, partnering with independent media, and launching joint awareness campaigns that promote inclusive narratives. These efforts have helped challenge anti-gender rhetoric and foster solidarity

1 Berlin Process Summit, Chair's Conclusions, 2024, p. 6, [https://www.berlinprocess.de/uploads/documents/chairs-conclusions-2024\\_1728992421.pdf](https://www.berlinprocess.de/uploads/documents/chairs-conclusions-2024_1728992421.pdf) (accessed March 27, 2025).

2 Ibid., p. 6

3 Ibid., p. 6

4 Berlin Process Summit, Agreement on Access to Higher Education and Admission to Study in the Western Balkans, 2024, p. 1, [https://www.berlinprocess.de/uploads/documents/agreement-on-admission-to-higher-education-in-the-western-balkans\\_1728992201.pdf](https://www.berlinprocess.de/uploads/documents/agreement-on-admission-to-higher-education-in-the-western-balkans_1728992201.pdf) (accessed March 31, 2025).

across borders. However, barriers persist. Many organizations lack sustainable funding for communications work, and restrictive media environments limit the reach of rights-based messages. The rise of coordinated anti-gender campaigns – often supported by political or religious actors – remains a serious challenge. To sustain momentum, CSOs need greater support for communications capacity building, digital outreach, and alliances with journalists, educators, and influencers who can help reshape public discourse toward equality and inclusion.

### **Status of 2024 Recommendations for Western Balkan Governments:**

Despite growing momentum, concerns remain about ongoing implementation gaps and the lack of political will at the national level, where resistance, weak accountability mechanisms, and deeply rooted narratives continue to hinder progress. In several parts of the region, conservative political discourse and prevailing social attitudes still pose significant obstacles to inclusive policymaking.

Despite the recommendation to the governments of the Western Balkans Six (WB6) to strengthen the enabling environment for CSOs, progress has been uneven. While some positive steps have been taken – such as consultations on draft strategic documents and participation in EU-supported platforms – many civil society organizations continue to operate in a shrinking civic space, with limited access to decision-making processes and ad hoc consultation mechanisms. Legal and administrative burdens, coupled with politicized funding frameworks, continue to undermine the independence and effectiveness of gender-focused CSOs.

A key recommendation of the working group was for WB6 governments to improve institutional responses to gender-based violence (GBV) and establish effective reporting mechanisms for gender-based harassment and discrimination in the workplace. This recommendation has seen limited uptake. While the WB6 have all adopted legal frameworks or strategies, implementation is fragmented, under-resourced, and often lacks meaningful follow-up. Reporting systems are inadequate or inaccessible, especially for women from marginalized communities, and survivors frequently face secondary victimization, low trust in institutions, and impunity for perpetrators.

GBV remains one of the most pressing human rights concerns in the region, with alarming prevalence and persistent gaps in prevention, protection, and prosecution. A coordinated, victim-centered and intersectional approach is urgently needed to ensure that institutional responses are not only in place but effective in practice. In this context, the Istanbul Convention stands as a crucial international standard. Yet, some political actors in the region continue to instrumentalize the Convention for populist agendas, framing it as controversial and threatening to withdraw or block ratification. Such actions pose a grave threat to women's safety and undermine regional commitments to EU approximation and international human rights obligations. Full alignment with the Istanbul Convention and its effective implementation must remain a priority for all WB6 governments if genuine progress on gender equality is to be achieved.

### **Status of 2024 Recommendations for Berlin Process Partners and the European Union:**

Several recommendations of the working group gained traction among stakeholders, particularly those calling for increased funding for gender-focused initiatives and stricter accountability mechanisms for gender action plans. Advocacy efforts successfully engaged EU institutions and regional organizations in discussions on how to integrate gender-responsive initiatives and gender sensitive policies into national frameworks.

Leaders welcomed and echoed several recommendations presented by the CSO representatives at the Berlin Process Summit 2024, including the call for the systematic integration of intersectional gender perspectives by the EU. While this acknowledgment remains general in nature, it represents a valuable opening for continued civil society advocacy and monitoring efforts. However, the recommendation to establish measurable commitments accompanied by regular progress tracking was not fully reflected in the leaders' declaration. The official conclusions fall short of recognizing the urgent need for gender-disaggregated data and lack a clear commitment to developing regional indicators aligned with EU benchmarks, an omission that risks undermining transparency, accountability, and policy impact.

The recommendation to continue dedicated working spaces on gender and diversity across all Berlin Process formats was indirectly acknowledged through



the inclusion of the Gender Equality Forum in the official summit program. However, its role remains consultative rather than structural.

One specific recommendation – calling for the use of existing frameworks to ensure sustainability – resonated with several high-level EU and member state representatives during advocacy meetings held under the Chatham House Rule. These representatives acknowledged the importance of building on established indicators, such as those set out in the EU Gender Action Plan III (GAP III) and its Country Level Implementation Plans (CLIPs), the Women, Peace and Security Agenda (WPS Agenda), the OECD Development Assistance Committee (OECD DAC) standards, and relevant national gender equality frameworks of Western Balkan countries.<sup>5</sup> While not publicly attributed, these exchanges indicate growing alignment with a more structured and measurable approach to gender mainstreaming within the Berlin Process.

EU representatives agreed with the recommendation from CSOs that embedding intersectionality in policy design would lead to improved outcomes. A more nuanced approach to gender policies is required, recognizing the unique barriers faced by women from diverse backgrounds, addressing intersecting vulnerabilities, and ensuring that no group is left behind. This also includes Regional Common Market-related initiatives and gender-sensitive labor policies and practices, which are essential for the economic empowerment of women and overall economic growth in the region. However, despite clear recommendations from the CSF 2024 to mainstream gender across all Berlin Process agendas, the recently signed Declaration on the Common Regional Market 2025–2028 is entirely gender-blind.<sup>6</sup> Neglecting to integrate gender considerations into such a central economic framework not only contradicts the CSF's guidance but also risks reinforcing structural inequalities and missing the opportunity for inclusive, sustainable development in the Western Balkans.

Last but not least, the recognition of gender-based violence (GBV) under the security section of the Chair's

Conclusions of the Berlin Process Summit 2024 is a highly commendable step which reflects a meaningful response to the CSF 2024's recommendation to embed gender in all aspects of regional security and stability strategies. Acknowledging GBV as a threat intrinsically linked to organized crime and regional instability reflects an important shift, positioning it not only as a human rights concern but as a core issue of peace, security, and rule of law. This recognition aligns with both the EU's GAP III and the WPS Agenda, which emphasize the need to address GBV as part of broader efforts to promote conflict prevention and democratic resilience.

## Priorities for the Berlin Process and Civil Society Forum in 2025

### Civil Society Forum 2025:

The Civil Society and Think Tank Forum 2024 laid the foundation for actionable change in gender and diversity policies. The next steps require sustained engagement with stakeholders, strategic advocacy, and continued pressure on decision makers to transform commitments into tangible outcomes.

The gender and diversity architecture of the CSF 2025 is important. The success of the first "Gender and Diversity" working group and the inaugural Gender Side Forum in 2024 should be further consolidated and strengthened. CSF 2025 should ensure that the established platforms become further aligned, permanent, and adequately resourced spaces for strategic dialogue. It should also maintain the participation format to include youth, LGBTIQ+, Roma, and persons with disabilities, ensuring intersectional representation. While the dedicated Gender and Diversity working group has proven vital in elevating marginalized voices and shaping focused recommendations, it is equally important to embed gender and diversity perspectives across all thematic working groups. These approaches are complementary, not mutually exclusive. A dual strategy – maintaining a strong standalone group while systematically integrating gender and

5 European Commission, EU Gender Action Plan (GAP) III, November 25, 2020, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020JC0017&from=EN> (accessed March 31, 2025); United Nations Security Council, Women, Peace and Security Agenda, October 31, 2000, <https://www.un.org/womenwatch/osagi/wps/> (accessed March 31, 2025); OECD, DAC Recommendation on Gender Equality and the Empowerment of All Women and Girls in Development Co-operation and Humanitarian Assistance, May 14, 2024, <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-5022> (accessed April 16, 2025).

6 Berlin Process Summit, Western Balkans Six Leaders' Declaration on Common Regional Market 2025–2028, 2024, [https://www.berlinprocess.de/uploads/documents/declaration-on-common-regional-market-2025-2028\\_1728992485.pdf](https://www.berlinprocess.de/uploads/documents/declaration-on-common-regional-market-2025-2028_1728992485.pdf) (accessed April 16, 2025).

diversity across all discussions – offers the best path forward. Future hosts should embrace this model to ensure both visibility and structural coherence in advancing equality across the Berlin Process.

Thematic priorities that have emerged during the CSF 2024 should be further explored for continued advocacy. For example, the CSF 2025 must build on the 2024 consensus that representation alone is insufficient. While quota systems have improved numerical participation, the impact of women and marginalized groups on policymaking remains constrained. In particular, the CSF 2025 should prioritize strategies for enabling substantive participation, not just presence, including political mentoring, leadership pipelines, and reform of electoral codes. This should include a focus on stronger monitoring mechanisms to track the quality – not only quantity – of women's participation at all levels of governance.

The CSF 2025 should also advocate for the institutionalization of gender-sensitive policymaking across all sectors. Civil society can play a vital role in proposing tools for gender programming and funding, impact assessments, and training for public servants. In addition, supporting inclusive data collection to track intersectional inequalities, with attention to ethnicity, disability, age, and socioeconomic status should be highlighted.

Lastly, a shared concern in 2024 was the persistent prevalence of gender-based violence and the systemic barriers that prevent survivors from accessing justice. Therefore, CSF 2025 should address GBV as a core regional priority and call for GBV prevention and response to be recognized as a pillar of regional stability. This should also include online harassment, hate speech, and political violence against women and LGBTIQ+ individuals in the scope of regional cooperation. To promote action, the CSF 2025 should highlight regional CSO-led coalitions and monitoring mechanisms to report on GBV trends and justice system responsiveness.

### **Berlin Process 2025:**

As we move forward towards the Berlin Process 2025, it is imperative to maintain momentum and build on the progress made in 2024. The Berlin Process provides a critical opportunity to institutionalize gender equality as a cornerstone of democratic governance in the Western Balkans. By leveraging the insights gained from this process and the accompanying fora,

governments and civil society actors can drive forward a more inclusive and equitable future for all.

Therefore, the Berlin Process 2025 needs to move beyond tokenism and embed gender and diversity across the entire process. Concrete representation goals across forums should be established. Gender and diversity must become crosscutting themes and all summit declarations, action plans, and regional cooperation mechanisms should include mandatory gender mainstreaming and intersectionality clauses. The Gender Equality Forum must be integrated into the formal summit reporting and evaluation cycle, with clear follow-up on its recommendations. Berlin Process partners and the EU should institutionalize this platform with clear mandates, resources, and follow-up mechanisms, ensuring that gender and diversity are embedded in the core architecture of regional cooperation. To ensure impact, a dedicated funding mechanism akin to the Regional Youth Cooperation Office (RYCO) should be considered to support gender-responsive initiatives and institutionalize long-term progress.

Building on the 2024 recommendations for the integration of gender and intersectionality aspects in the Common Regional Market Action Plan, the Berlin Process 2025 should support economic empowerment by endorsing targeted measures to reduce gender gaps and segregation in employment, entrepreneurship, and digital access. In addition, the Berlin Process should facilitate regional funding mechanisms for women-led businesses and care economy innovations. For example, a Berlin Process-backed Gender Innovation Fund could be co-financed by participating Berlin Process partner governments and managed in collaboration with the Regional Cooperation Council (RCC) to support women entrepreneurs in social care, early childhood education, and elder services across the Western Balkans. The Berlin Process could also champion the establishment of a regional investment facility under the Western Balkans Investment Framework, developed in partnership with development banks such as the European Bank for Reconstruction and Development (EBRD) or the Council of Europe Development Bank. This facility could combine grants, low-interest loans, and technical assistance to support women entrepreneurs in scaling businesses in early childhood education, elder care, and domestic labor-saving innovations, prioritizing inclusive solutions that reduce the unpaid care burden and strengthen regional cohesion.

The Berlin Process 2025 must acknowledge and respond to the rise of anti-gender populism to safeguard against further gender backlash. It could discuss and include obligatory commitments to protect gender equality frameworks in line with international and EU standards, as well as foster regular review mechanisms to detect and respond to retrogressive policy changes. For example, by utilizing existing frameworks, the Berlin Process should support existing gender equality monitoring mechanisms or create a new regional gender equality observatory to track progress and setbacks across the six countries.

Last but not least, the Berlin Process 2025 can further contribute to regional mechanisms for implementation and accountability by supporting peer-learning exchanges between governments, civil society, and gender experts on best practices.

# COMMON REGIONAL MARKET AND MOBILITY

Rapporteurs: Alban Hashani, Visar Vokri | Riinvest Institute

## Outcomes of the Berlin Process Summit 2024

The Declaration on the Common Regional Market issued following the Berlin Process Summit 2024 stressed the Western Balkans Six (WB6) leaders' recognition of the urgent need for economic integration and institutional reforms to bridge the convergence gap with the European Union (EU).<sup>1</sup> Acknowledging the region's complex geopolitical landscape, the leaders reaffirmed their commitment to deeper regional cooperation as a stepping-stone to EU accession.

Furthermore, by emphasizing democracy, fundamental rights, and the rule of law, the WB6 leaders demonstrated an understanding that economic progress must be complemented by institutional stability. Their support for the new Common Regional Market (CRM) Action Plan 2025-2028 signaled a commitment to regional ownership of reforms. This approach reinforced the credibility of the enlargement process and strengthened the region's institutional foundations. The explicit commitment to implementing all agreements related to the CRM without undermining existing obligations was also important.

Key accomplishments under the 2021-2024 CRM framework were recognized, including mutual recognition of qualifications, reduced roaming charges, progress towards Single European Payments Area (SEPA) membership, trade facilitation initiatives such as the establishment of the Green Lanes, and freedom of movement. However, progress remained minimal in Bosnia and Herzegovina concerning Kosovo.

The unblocking of the Central European Free Trade Agreement (CEFTA) and adoption of multiple trade and economic cooperation measures were also highlighted as significant steps forward. Additionally, the Berlin Process 2024 applauded the signing of the student mobility agreement in the Western Balkans, which enhanced student mobility and complemented

prior mobility agreements. The declaration emphasized the need for full implementation of all signed agreements to maximize their impact. Lastly, EU Growth Plan was acknowledged as a crucial tool for fostering regional economic development and EU integration through institutional and economic reforms.<sup>2</sup> The role of regional bodies such as the Regional Cooperation Council (RCC), CEFTA, and the Western Balkans 6 Chamber Investment Forum (WB6 CIF) was praised for their contributions to policy implementation.<sup>3</sup>

## Implementation and Consideration of Civil Society and Think Tank Forum 2024 Recommendations

Over the past couple of months, civil society organizations (CSOs) and think tanks in the WB6 have engaged in continuous discussions and dialogue, from the Preparatory Forum in Skopje to high-level discussions at the Berlin Process Summit and individual ministerial meetings before the Summit. These exchanges have highlighted persistent challenges in regional economic integration, mobility, and cooperation. Stakeholders frequently agreed that disparities in development, policy fragmentation, and political disputes hinder progress, while workforce migration and skill mismatches further complicate the economic landscape. Tackling these issues requires sustained reforms, stronger regional collaboration, and consistent engagement from the EU. The energy that characterized these discussions must now translate into concrete actions for a more integrated and resilient Western Balkans.

It should be noted that there has been some progress in advancing CSOs recommendations from the Working Group on "Common Regional Market and Mobility." Notable traction was among representatives from the EU institutions, individual EU countries, and other non-governmental organizations. This modest

1 Western Balkans Six Leaders' Declaration on Common Regional Market 2025-2028, 2024, [https://www.berlinprocess.de/uploads/documents/declaration-on-common-regional-market-2025-2028\\_1728992485.pdf](https://www.berlinprocess.de/uploads/documents/declaration-on-common-regional-market-2025-2028_1728992485.pdf) (accessed April 28, 2025).

2 Berlin Process Summit, Chair's Conclusions, 2024, p. 2, [https://www.berlinprocess.de/uploads/documents/chairs-conclusions-2024\\_1728992421.pdf](https://www.berlinprocess.de/uploads/documents/chairs-conclusions-2024_1728992421.pdf) (accessed April 28, 2025).

3 Ibid., p. 3.

progress provides a strong foundation for the 2025 Civil Society Forum to further build upon.

### **Status of 2024 Recommendations for Civil Society Organizations (CSOs):**

One of the most widely supported recommendations has been the inclusion of CSOs in reform agendas, particularly within the Berlin Process. There was a broad consensus among stakeholders that CSO involvement in decision making and implementation enhances the effectiveness of commitments by ensuring they address citizen concerns. In advocacy meetings, stakeholders from the EU expressed their support for institutionalizing CSO engagement to formalize their participation in policy design processes rather than limiting their role to consultations.

### **Status of 2024 Recommendations for Western Balkan Governments:**

A key recommendation was for the governments of the WB6 to deepen their political dialogue and reinforce their commitment to regional cooperation. This requires sustained engagement at both the political and technical levels to overcome existing barriers, foster trust among regional partners, and ensure the effective implementation of shared initiatives that drive economic integration and stability.

While the working group recommended that the WB6 countries should expedite the implementation of essential structural reforms in key areas such as judicial independence, public procurement transparency, and financial oversight, significant progress has not been observed. The slow pace of reform undermines public trust, hampers investment climate improvements, and risks delaying broader EU integration efforts for the region. Strengthening these institutional frameworks is crucial for enhancing governance, improving the business environment, and laying a solid foundation for deeper regional integration and EU accession.

The recommendation to create a shared Regional Migration Data Platform has not yet been implemented but should be prioritized, as it is unlikely to face opposition and would significantly enhance migration management. A centralized system for collecting,

analyzing, and sharing migration-related data would improve policymaking, facilitate better regional coordination, and help address challenges such as labor mobility, demographic shifts, and asylum policies. By ensuring real-time data access for all WB6 governments, such a platform would contribute to more effective and coordinated responses to migration trends in the region. The platform could either be integrated into existing mechanisms, such as the RCC, or established as a new structure with each national authority appointing a focal point (e.g., a ministry or agency) responsible for feeding data into the platform, ensuring quality control, and serving as a liaison for regional cooperation.

### **Status of 2024 Recommendations for Berlin Process Partners and the European Union:**

Workforce mobility remains a high-priority issue, as highlighted in the recommendations. The EU needs to actively promote and facilitate agreements on the recognition of diplomas and regulated professions. Some progress can be observed: the EU has pushed for mutual recognition agreements which align with broader regional mobility initiatives. Ongoing efforts from all the parties involved, including the EU and WB6, suggest that new frameworks may be implemented in the near future to ease labor movement across borders. However, some frameworks have emerged in parallel to the Berlin Process: for instance, the Agreement on Conditions for Free Access to the Labor Market in the Western Balkans, signed by Albania, North Macedonia, and Serbia in 2021 under the Open Balkan Framework. In case no progress is made within the Berlin Process, alternative projects could be competing initiatives or bilateral agreements.<sup>4</sup>

On the issue of regional mobility, the recommendation to encourage Bosnia and Herzegovina (BiH) to ratify the Agreement on Freedom of Movement with Kosovo has gained traction among EU policymakers. Following Kosovo's unilateral adoption of the agreement to allow visa-free entry by citizens of BiH, there is growing recognition within the EU of the need to incentivize BiH's ratification and allow visa-free entry by citizens of Kosovo. There was also a consensus among CSOs in the Western Balkans on the recommendation to link mobility agreements to the accession process, increasing the likelihood of imminent action by the EU and Berlin Process partner governments.

<sup>4</sup> Chamber of Commerce and Industry of Serbia, Agreement for Conditions of Access to the Labor Market in the Western Balkans, 2021, [https://en-api.pks.rs/storage/assets/Agreement\\_on\\_conditions\\_for\\_free\\_access\\_to\\_the\\_labour\\_market\\_in\\_the\\_Western\\_Balkans.pdf](https://en-api.pks.rs/storage/assets/Agreement_on_conditions_for_free_access_to_the_labour_market_in_the_Western_Balkans.pdf) (accessed April 23, 2025).



Export-oriented small and medium enterprises (SMEs) have also received increased attention, particularly regarding financial and technical support as was recommended. The role of SMEs in regional economic integration and EU accession was widely acknowledged in advocacy meetings with regional organizations. As a result, participants in the advocacy meetings and other discussions have agreed on the need to expand EU financial instruments and technical assistance programs to bolster SME competitiveness.

An important development has been agreement among stakeholders in advocacy meetings on the necessity of a monitoring and accountability framework to track commitments made under the Berlin Process, as was recommended. Both the RCC (though they monitor the progress to some extent) and the European Commission have acknowledged the importance of such a mechanism, with proposals being made by the “Common Regional Market and Mobility” working group for regular progress reports and an online dashboard to enhance transparency and compliance. Finally, there has been broad consensus on the need for impact assessments of regional cooperation agreements. CSOs are increasingly pushing for systematic evaluations to ensure data-driven policy adjustments. Several EU stakeholders have expressed openness to integrating impact assessments into existing evaluation mechanisms, reinforcing CSOs’ role in governance and social cohesion.

## Priorities for the Berlin Process and Civil Society Forum in 2025

### Civil Society Forum 2025:

In preparation for the Berlin Process 2025, CSOs should organize country-specific consultation events to gather input from the broader CSO community in each WB6 country. These consultations should serve as a platform for identifying key challenges and formulating policy recommendations that reflect diverse perspectives. The outcomes should be synthesized and presented initially at the Preparatory Forum to ensure that CSOs’ voice is meaningfully included in the Berlin Process agenda.

CSOs should take a more proactive role in holding WB6 governments accountable for their commitments within the Berlin Process. To achieve this, CSOs should prepare and present country-specific progress reports that assess the implementation of regional

cooperation agreements, policy commitments, and key reforms. These reports should be evidence based, publicly accessible, and presented in the Berlin Process 2025 events, including the Berlin Process Summit in London. This will ensure greater transparency, foster public debate, and create pressure for tangible progress in regional cooperation. In this regard, CSOs should advocate for the establishment of a formal framework for conducting systematic impact assessments of regional cooperation agreements and Berlin Process commitments starting in 2025.

### Berlin Process 2025:

Some areas require additional focus, making a strategic approach with regular progress reports essential for the effective implementation of recommendations. This will enhance regional cooperation, advance institutional reforms, and promote economic integration across the WB6. In this regard, as suggested above, the creation of a Regional Migration Data Platform should be prioritized in the Berlin Process in 2025. To operationalize this, the Berlin Process in 2025 should support WB6 governments to establish a technical working group responsible for designing and implementing the platform, ensuring interoperability with existing national statistics.

Strengthening political dialogue and commitment to regional cooperation remains a pressing need. Aligning frameworks like CEFTA with environmental priorities under the Green Agenda for the Western Balkans can serve as a starting point. The Berlin Process in 2025 should help initiate government-to-government sectoral dialogues focusing on trade and sustainability, with EU technical support to ensure that economic integration aligns with green transition goals.

Building on last year’s discussions, a rather rigorous recommendation that stems from all the discussions of the working group suggests linking the Growth Plan to conditionality in the EU accession process. By tying financial support to measurable reform progress, the EU can incentivize timely and effective governance improvements. This approach requires further discussion among EU policymakers and WB6 governments to define achievable conditions while ensuring credible commitments and maintaining political stability in the region, perhaps through a Berlin Process platform.

Regulatory alignment remains a major challenge, particularly in addressing non-tariff barriers. This should be among the key topics within the Berlin Process

2025 while the EU should support a phased approach, providing direct assistance to lagging countries and setting clear timelines for regulatory harmonization. Establishing a regional regulatory task force made up of relevant national authorities such as ministries covering trade and customs could help streamline these efforts and monitor compliance.

# ENERGY, CLIMATE CHANGE, AND DECARBONIZATION

**Rapporteur:** Nihad Harbaš | ReSET – Sustainable Energy Transition Center

## Outcomes of the Berlin Process Summit 2024

Based on the activities and discussions carried out within the Berlin Process framework, certain progress has been made on “Energy, Climate Change, and Decarbonization” in 2024.

A key achievement of the Berlin Process 2024 was to establish an annual Ministerial Meeting on the Green Agenda for the Western Balkans (GAWB) within the Regional Working Group on the GAWB framework. This was confirmed in the Berlin Process Chair’s Conclusions, which state: “The Ministerial endorsed the Hamburg Declaration on the Green Agenda for the Western Balkans, renewing and strengthening the commitment of the Western Balkan Six (WB6) to the full and timely implementation of the GAWB and its Action Plan 2021-2030, with the vision of achieving climate neutrality by 2050.”<sup>1</sup>

Another success of the Berlin Process 2024 was to enable discussions between civil society organizations (CSOs) from the WB6 and key stakeholders from the European Union (EU). Some of the recommendations made by CSOs have been accepted and their implementation is already underway.

## Implementation and Consideration of Civil Society and Think Tank Forum 2024 Recommendations

### Status of 2024 Recommendations for Civil Society Organizations (CSOs):

The working group recommended that CSOs from the Western Balkans and partner countries should create regular opportunities for collaboration between experts and energy authorities from the Western Balkan countries. This recommendation was well-received by EU partners and has been taken up. The Berlin Process has supported CSOs by ensuring their

inclusion into the process and by recognizing their recommendations for the decarbonization of the WB6.

In response to the recommendation for CSOs to create opportunities for regular cooperation between energy authorities and experts from throughout the WB6, Western Balkan CSOs have continued to engage actively in expert conferences, public debates, formal dialogues but also in formal working groups in the Energy Community, national governments, local authorities and other organizations in the phases of planning, implementation, and monitoring of projects and reforms in this thematic area.

### Status of 2024 Recommendations for Western Balkan Governments:

Due to low economic development and the difficulty of institutional reform in the Western Balkans, governments have not yet adopted the recommendation on respecting and implementing the same environmental and social standards in mining, energy and climate sectors as in the EU.

While the Energy Community Secretariat (EnCS) is constantly working with WB6 parliaments, it remains difficult to reform the EnCS and formally integrate WB6 parliaments into EnCS’s decision-making processes. Such a reform would require the amendment of the EnCS’s Treaty, the establishment of an Energy Community and significant political will from the WB6 governments. Therefore, this recommendation so far remains unfulfilled.

The recommendation to WB6 governments to act on their international commitments to pursue an energy transition by implementing the EU acquis was discussed in advocacy meetings with stakeholders. The recommendation suggested integrating social and environmental standards as well as supporting more sustainable energy infrastructure. However, a lack of political will to accelerate reform and harmonization of

<sup>1</sup> Berlin Process Summit 2024, Chair’s Conclusions, 2024, [https://www.berlinprocess.de/uploads/documents/chairs-conclusions-2024\\_1728992421.pdf](https://www.berlinprocess.de/uploads/documents/chairs-conclusions-2024_1728992421.pdf) (accessed April 28, 2025).



national legislation with the EU Acquis has impeded any significant progress on this recommendation.

### **Status of 2024 Recommendations for Berlin Process Partners and the European Union:**

In line with the CSO recommendations, the EU supported by the EnCS has developed several models for the WB6 to introduce the EU Emissions Trading Scheme (ETS) into the region. The EnCS will provide support for the national implementation of the ETS as well as other international obligations on energy and decarbonization.

As the implementation of international obligations under the Energy Community Treaty in the WB6 has been delayed, the recommendation to increase support by the EnCS was well received. EnCS support could include continuous cooperation, guidelines, and technical assistance to the WB6 to fulfill their obligations.

Through its Growth Plan for the WB6, the EU seeks to support the timely adoption of international obligations in the region. The adoption of strategy documents and monitoring frameworks aim to support the WB6 to achieve a much-needed energy transition. Additionally, support for socially vulnerable groups through energy efficiency measures, the establishment of energy communities, and prosumers has been planned. These activities will enable the WB6 to progressively advance toward the EU energy market. These activities, if implemented, would further see a more significant contribution to a bottom-up approach in line with CSO recommendations.

International organizations are implementing projects that focus on local communities, citizens, and energy communities in the interconnected fields of energy, climate change, and decarbonization. Best practices are being shared and implemented in other local communities, in line with CSO recommendations. However, support for these communities must be further increased.

While the European Union does not support the WB6 with coal-related subsidies, the question of natural gas remains unresolved. EU representatives, aiming to reduce dependencies on Russian gas, believe it is necessary to support gas projects in the Western Balkans for the attainment of that goal. However, CSOs remain firm and insist on the EU's opposition to investments into fossil fuel projects of any sort.

To avoid additional burdens on the WB6 economies, temporary free allocations of CO<sub>2</sub> emission permits were proposed in the CSF 2024 recommendations. This recommendation was not accepted, and the WB6 governments must decide whether to establish a model for their respective country or to establish a regional ETS scheme.

On the EU's support for a just transition, a clear gap remains between what the EU is providing the WB6 and what should be provided according to the CSF 2024 recommendations. The just transition is a crucial element of the WB6's energy transition, directly linked to commitments under the National Energy and Climate Plan (NECP) and the Green Agenda for the Western Balkans. However, its implementation faces considerable economic, institutional and social challenges. The transition away from coal is not only a policy priority but also an economic necessity. This can be most notably linked to the sector's financial distress and the implications of decarbonization policies such as the EU Carbon Border Adjustment Mechanism (CBAM) and the EU ETS. In some regions, coal-related and state-owned enterprises dominate employment, limiting alternative job opportunities. The absence of a formal and just transition framework, the lack of active employment programs as well as weak coordination between local and national labor institutions are further hindering large-scale reskilling efforts.

Beyond the mere satisfaction of financial needs, interventions through legal, business, market and institutional channels will be required to enable a fair, inclusive and just transition. To support the WB6 in a just transition process, the EU should open its Just Transition Fund (JTF) for the WB6. This recommendation has not yet been adopted.

## **Priorities for the Berlin Process and Civil Society Forum in 2025**

### **Civil Society Forum 2025:**

The coal sector is no longer financially, economically or environmentally sustainable. The industry has been operating at a financial deficit, with short-term liabilities surpassing total annual revenues. Moreover, unpaid social security contributions and ongoing state subsidies highlight the fragility of coal-dependent employment and the increasing burden on public finances. WB6 have pledged to increase the share of renewables, improve energy efficiency, and reduce

greenhouse gas (GHG) emissions, all of which require structural changes in the labor market.

Ensuring a successful transition will require substantial financial resources, particularly for reskilling programs and job placement initiatives. The Civil Society Forum (CSF) 2025 should advocate for scaling up existing pilot programs, reskilling, economic diversification, institutional capacity-building, integrating international best practices, and securing long-term financial support from the EU and global partners. The CSF 2025 should highlight potential strategies to achieve a sustainable, well-planned workforce transition that mitigates social and economic disruptions while driving WB6's energy transition forward.

A top-down approach could in this way contribute to a policy environment conducive to a just transition. However, decarbonization should be more supported by a bottom-up approach in order to motivate citizens, enterprises, and local communities to achieve better living and working conditions and produce "local" renewable energy. The CSF 2025 should draw further attention to this point by bringing local citizens and CSOs into policy dialogues and demonstrating what is possible at the local level. Strategic support must emphasize local energy production and a just transition (two sides of the same coin) based on a bottom-up approach and active participation of local actors including CSOs. Support should further avoid investments into fossil fuels and double standards (environmentally and socially) especially in relation to mining, energy, and the climate.

### **Berlin Process 2025:**

In 2025 the Berlin Process should utilize the momentum from 2024 and swiftly act on a number of key issues. As some solutions have already been proposed, decision makers should implement them now.

To monitor and supervise the implementation of the recommendations and conclusions of the Berlin Process, it is necessary to create a Berlin Process monitoring platform. This platform could be created at the EnCS and would be responsible for monitoring the implementation of the recommendations and conclusions of the Berlin Process in the energy sector. At the same time, the Contracting Parties should be obliged to report implementation progress to this platform.

To ensure a transparent energy transition process and the involvement of all relevant stakeholders, it is

necessary to establish a network of independent experts on energy and decarbonization from CSOs, industry, academia, and think tanks from the WB6. This can be done through the establishment of "Centers for Sustainable Energy Transition" in each WB6 country. Putting this process into action relies on funding from the EU and the formal integration of the WB6 countries in the reform process. The Berlin Process should advance this priority in 2025 by advocating to the key stakeholders from the EU and WB6.

The role of WB6 national parliaments in the processes of initiating, adopting, implementing, and reporting on their countries' international obligations should be strengthened. This would improve and boost reform processes in the areas of energy, climate change, and decarbonization. Therefore, it is recommended for the Berlin Process to help reform the EnCS and explicitly involve the WB6 national parliaments in the EnCS's decision-making processes in a formalized role.

Given that the energy mix of the WB6 is predominantly based on fossil fuels, the impact of the EU's ETS and CBAM on the WB6 economies will be very harsh. For this reason, the Western Balkans need assistance to establish ETS modalities and reduce the impact of CBAM such as free allocation of CO2 certificates for a certain period and conditions under the EU ETS. Within the Berlin Process in 2025, this should be a major priority.

Therefore, more support for the integration of renewables into the energy mix of the WB6 is crucial. Additionally, the EU should stop any further investments into fossil fuels.

Another crucial element is the support for extremely energy-poor households with innovative projects (e.g., implementing energy efficiency measures and/or PV for self-consumption), which would enable an economically acceptable energy price for specific customers. The Berlin Process should advance this priority in 2025 by advocating to the key stakeholders in the EU and the WB6.

Although specific roadmaps, action plans, and strategies for a just transition already exist, the Berlin Process should help move projects forward from the planning phase to the financing phase. Opening the existing EU Just Transition Fund to the WB6 will make capital investments in sustainable energy projects more acceptable and feasible.

# ENVIRONMENTAL PROTECTION AND SUSTAINABLE ECONOMIC DEVELOPMENT

**Rapporteurs:** Aleksandër Trajçe, Klejn Ngraçani | PPNEA

## Outcomes of the Berlin Process Summit 2024

The Berlin Process Chair's Conclusion 2024 ("the declaration") demonstrated an interest in establishing synergies between environmental protection and sustainable economic development in the Western Balkans. This was to be achieved by mainstreaming a few of the issues under the umbrella of energy, climate policy, and Green Agenda for the Western Balkans (GAWB).<sup>1</sup>

However, though important issues such as the green transformation of the region and renewable energy were pointed out, the declaration did not take into consideration important crosscutting issues and other factors. While the declaration acknowledged "the opportunities green transformation can offer the Western Balkans region to align with EU standards and advance the region's integration into the EU market," it failed to name Roma, other vulnerable and ethnic minorities, or civil society organizations (CSOs) as crucial actors in the process.<sup>2</sup>

Furthermore, even though the declaration pointed out that a renewed and strengthened commitment of the Western Balkan Six (WB6) should be in place "for the full and timely implementation of the GAWB and its Action Plan 2021-2030 with the vision to achieve climate-neutrality by 2050," it failed to place CSOs as stakeholders in the envisaged update of the GAWB Action Plan, leaving a vacuum in public participation.<sup>3</sup>

Moreover, while the declaration applauded the idea of "accelerating renewable energy and supporting energy efficiency and infrastructure investments," it failed to take into consideration that the sites for renewable energy production must not be situated in important bird and biodiversity areas, ecological corridors, and other important areas for nature conservation.<sup>4</sup> Nevertheless, the commitment to further invest in and

mainstream the green transformation of the region is an applaudable position.

## Implementation and Consideration of Civil Society and Think Tank Forum 2024 Recommendations

The recommendations drafted following the fruitful discussions among the working group participants were the backbone of many advocacy meetings held with important stakeholders. It is worth mentioning that some of the recommendations gained more momentum than others across the advocacy meetings.

### Status of 2024 Recommendations for Civil Society Organizations (CSOs):

CSOs in the region have further work to do to fulfill the recommendation to strengthen their advocacy efforts when it comes to issues related to environmental protection and sustainable economic development. While many CSOs have focused their work on these thematic issues, in many cases they still fail to lead meaningful campaigns which can impact policymaking across the region. Even though semi-authoritarian practices are present within the WB6 governments, a strong civil society represents a meaningful opposition that can cause policy change. This should be the case with the upcoming revision of the Green Agenda Action Plan, due in October 2025, where the participation of civil society is crucial. Furthermore, CSOs in the region should take up more responsibility in fulfilling the recommendation to play the role of the watchdog in relation to clientelist Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) reports, which are widespread across the region, and serve to legitimize infrastructure projects that actually pose a threat to nature and biodiversity.

1 Berlin Process Summit 2024, Chair's Conclusions, 2024, [https://www.berlinprocess.de/uploads/documents/chairs-conclusions-2024\\_1728992421.pdf](https://www.berlinprocess.de/uploads/documents/chairs-conclusions-2024_1728992421.pdf) (accessed March 25, 2025).

2 Ibid., p. 5.

3 Ibid., p. 6.

4 Ibid., p. 6.; Birdlife International, Important Bird and Biodiversity Areas (IBAs), <https://datazone.birdlife.org/about-our-science/ibas> (accessed March 25, 2025).

### Status of 2024 Recommendations for Western Balkan Governments:

The recommendation to decouple ministries in charge of the environment from conflicting policy areas such as tourism or infrastructure gained momentum throughout the advocacy meetings, because quite often coupling environment with other sectors results in clear conflict of interest. In the existing cases (as this is not the case for all WB6 countries), the decoupling process could ensure that environmental concerns and policies would be pushed forward more easily, without competing for a better position within the agenda of the same institution, as witnessed across the region. Furthermore, not being under the constraints of a single institutional budget, environmental policies would not have to compete for funds, which are often reallocated to conflicting and more prioritized sectors. Nevertheless, no changes have been implemented yet in relation to this issue in countries such as Albania, Kosovo, Montenegro, and Bosnia and Herzegovina.

The recommendation directed to the WB6 governments regarding the need to collaborate closely with CSOs to determine suitable or already degraded areas which can be used as sites for renewable energy production was welcomed by several actors throughout the advocacy meetings. Even though initiatives for renewable energy production in the region, in general, represent an important shift towards a greener future, these initiatives can be harmful to biodiversity if situated in protected areas, important biodiversity areas, ecological corridors etc., as witnessed in many cases throughout the WB6 countries.

### Status of 2024 Recommendations for Berlin Process Partners and the European Union:

The recommendation on the regular monitoring of the Green Agenda implementation and its inclusion at the European Commission progress reports for the respective WB6 countries was welcomed during the advocacy meetings with EU stakeholders. Making the GAWB a crucial part of the EU conditionality regime is essential to ensuring its implementation across the WB6 countries and to further strengthening the commitment of WB6 governments in the green transition of the region.

Addressing the absence of rule of law in environment-related decision-making processes was a key recommendation which remains the strongest challenge for the WB6 countries. Many infrastructure projects throughout the region are praised as development projects from which communities will benefit, but, in fact, jeopardize the integrity of protected areas, future Emerald Network sites (a project of the Council of Europe under the Bern Convention), and important areas for nature conservation. Even though legal suits have been issued by environmental CSOs on the grounds of poor and clientelist EIA and SEA reports, the construction works frequently continue uninterrupted. This is for example the case regarding the construction of the Vlora International Airport within the Vjosa-Narta Protected Area in Albania.

Another crucial recommendation which remains a challenge in the region is the revision of all existing EIA and SEA reports to stop environmental destruction. This recommendation was welcomed during the advocacy meetings with different stakeholders, but no progress is expected to be witnessed soon. Nevertheless, proper EIA and SEA reports could be a first step in this process. This could be achieved by strengthening approval mechanisms, for example, by appointing committees including CSO representatives who would prioritize nature conservation and prevent environmentally detrimental actions.

## Priorities for the Berlin Process and Civil Society Forum in 2025

### Civil Society Forum 2025:

A key priority for the Civil Society Forum 2025 should be to mainstream the issue of CSO participation in the finalization of the GAWB action plan, which is due in October 2025. While the Hamburg Declaration of 2024 acknowledged the need to finalize the GAWB Action Plan and advance a multistakeholder approach to support the green transition in the WB6 countries, it failed to place CSOs as a crucial actor in this process.<sup>5</sup> This concern was raised in several advocacy meetings with different stakeholders.

Another key priority for the Civil Society Forum in 2025 should be to create a working group which would

<sup>5</sup> Berlin Process 2024, Hamburg Declaration on the Green Agenda for the Western Balkans, 2024, [https://www.berlinprocess.de/uploads/documents/hamburg-declaration-on-the-green-agenda-for-the-western-balkans\\_1729083604.pdf](https://www.berlinprocess.de/uploads/documents/hamburg-declaration-on-the-green-agenda-for-the-western-balkans_1729083604.pdf) (accessed February 7, 2025).

bring together the sector of energy with that of nature conservation, since they are fundamentally intertwined. This group would allow the issue of sustainable energy production to be conceptualized within a nature conservation framework, pushing forward recommendations such as the need to ban hydropower across the region, establish working committees for selecting suitable areas for sustainable energy production, which should not be situated within important areas for nature conservation, facilitate decentralized energy communities, and more.

### **Berlin Process 2025:**

Last year's recommendations offer a roadmap to create a synergy between environmental protection and sustainable economic development in the WB6 countries. While transforming the region's economies into green economies can be challenging, the implementation of these specific recommendations will lay a strong foundation to pave the way for a greener future.

In particular, the absence of rule of law in environmental-related decision-making should be mainstreamed as a priority topic in the Berlin Process 2025. To make progress, the Berlin Process should emphasize that the absence of rule of law is a structural problem that goes against the core values of a democratic society, which constitute the foundation of the European Union. Unifying the leaders of the WB6 countries to pledge to address the absence of rule of law in general, and in environmental-related decision making in particular, could be a first and crucial step towards addressing this issue across the region.

The shortcomings of rule of law in the region are closely intertwined with widespread practices of corruption, which jeopardize participatory democracy and strengthen semi-authoritarian or competitive authoritarian regimes. In the framework of the Berlin Process the WB6 leaders should pledge to fight corruption and establish a transparent monitoring mechanism, which should be open to the general public as well as CSOs.

The Berlin Process, through the leadership of EU member states and the United Kingdom, should advocate for crucial reforms among the WB6 countries, aiming to boost participatory democracy and strengthen freedom of speech, which constitute the foundation not only for democratic governance but also for a functioning civil society, enabling it to act as an effective watchdog. Through advocacy and

participation, civil society can drive positive change in areas such as environmental conservation and justice. By fostering these democratic principles, the Berlin Process can contribute not only to political stability but also to environmental sustainability in the region.



# DISINFORMATION AND CYBER THREATS

Rapporteurs: Olivera Nikolic, Vojislav Raonic | Montenegro Media Institute

## Outcomes of the Berlin Process Summit 2024

The Berlin Process Chair's Conclusions 2024 prioritized cybersecurity while indirectly linking disinformation and media freedom to democracy, strong institutions, and security.<sup>1</sup> The Chair's Conclusions specifically acknowledged the growing challenge of hybrid threats amid significant global uncertainty. The document emphasized the need to "foster cyber resilience through a whole-of-region, government, and society approach."<sup>2</sup> It noted that "dedicated activities, including capacity building in cyber diplomacy as well as incident response, are key, particularly regarding the Joint Partnership for Strengthening Cyber Resilience in the Western Balkans established in the Berlin Process in 2022."<sup>3</sup> Furthermore, it recognized the proposal by France, Slovenia, and Montenegro for the Western Balkans Cyber Capacity Centre (WB3C) to "strengthen the cyber pillar of the Berlin Process and act as the regional hub for cyber capacity building, with and for the benefit of the Western Balkan region."<sup>4</sup>

Additionally, media freedom was positioned as a fundamental part of democracy and resilience, as stated in paragraph 11 of the document: "Democracy, rule of law, human rights such as freedom of speech and freedom of assembly are important for the development of the Western Balkans region."<sup>5</sup> However, despite these references, disinformation and media freedom were not explicitly prioritized, which should be reassessed, considering the current global context of rising disinformation and harmful content during recent electoral processes in Europe and growing polarization in the Western Balkan Six (WB6) societies.

## Implementation and Consideration of Civil Society and Think Tank Forum 2024 Recommendations

### Status of 2024 Recommendations for Civil Society Organizations (CSOs):

Civil society organizations (CSOs) and think tanks operating within the Western Balkans have consistently endorsed the recommendations set forth by the Civil Society Forum (CSF) 2024 through active advocacy, participatory capacity building, and engagement in the formulation of policy. Their initiatives exemplify a robust commitment to combating disinformation and advancing media freedom. As was recommended, civil society organizations have undertaken significant efforts to assess the alignment of local legislation with the Digital Services Act (DSA) and the European Media Freedom Act (EMFA), effectively introducing this matter into discussions and offering critical input and expertise in the development of tailored national roadmaps, as advocated through the Civil Society Forum.<sup>6</sup>

### Status of 2024 Recommendations for Western Balkan Governments:

The development of country-specific roadmaps to align with the DSA and the EMFA has been considered, as was recommended. This includes some of the WB6 countries, such as when Montenegro's Minister of Media Tamara Vujovic highlighted on a panel at the Civil Society Forum 2024 that the Montenegrin government will form a working group to analyze the level of compliance with the DSA and EMFA. While CSOs supported by the European Union (EU) have conducted initial studies, none of the WB6 have, so far, developed specific roadmaps that would provide a structured path for aligning with EU legislation and for enabling

1 Berlin Process Summit 2024, Chair's Conclusions, 2024, [https://www.berlinprocess.de/uploads/documents/chairs-conclusions-2024\\_1728992421.pdf](https://www.berlinprocess.de/uploads/documents/chairs-conclusions-2024_1728992421.pdf) (accessed March 28, 2025).

2 Ibid., p. 8

3 Ibid., p. 8

4 Ibid., p. 8.

5 Ibid., p. 3.

6 Danche Danilovska-Bajdevska, Emily Wright, Maida Culahovic, Megi Reçi, Milica Tosić, Snežana Nikčević, and Teuta Sahatqija, Towards a Feasible Implementation of the Digital Services Act in the Western Balkans, Partners for Democratic Change Serbia, June 2024, <https://www.partners-serbia.org/public/news/dsa-wb-new.pdf> (accessed March 28, 2025); Jelena Adamović, Mila Bajić, Snežana Bajčeta, Bojan Perković, and Tijana Stevanović, DSA, DMA, AIA and Western Balkans, The Share Foundation, 2024, <https://osfwb.org/wp-content/uploads/2024/07/DSA-DMA-AI-Study.pdf> (accessed March 28, 2025).

mechanisms for tackling harmful content while ensuring a human rights-based approach.<sup>7</sup> However, ongoing discussions on this matter involve various regional stakeholders, including the WB6, the Regional Cooperation Council (RCC), CSOs, regulators, academics, and fact-checkers in collaboration with their EU counterparts, with plans to continue in 2025.

Partial progress has been made on the recommendation to report disinformation and cyber threats through regular EU progress reports, ensuring follow-up, elevating the political significance of disinformation, and enabling consistent monitoring across the region. Addressing these issues is advised in the Montenegro Progress Report 2024 through Chapter 10, “Digital Transformation and Media,” and Chapter 31, “Foreign, Security, and Defense Policy.”<sup>8</sup>

### **Status of 2024 Recommendations for Berlin Process Partners and the European Union:**

Improvements have been made on cybersecurity with the official inauguration of the Western Balkans Cyber Capacity Centre (WB3C) on December 9, 2024, in Montenegro. The center, initiated by the Berlin Process, emphasizes the importance of a coordinated regional response to increasing cyber threats, as was also recommended by the CSF 2024.

While the recommendation for the EU and its member states to encourage Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) to appoint regional legal representatives and to extend the Code of Practice on Disinformation to the Western Balkans remains unfulfilled, recent discussions at the EU level and shifts in Meta’s content moderation and diversity, equity, inclusion, and accessibility (DEIA) policy have reaffirmed its importance.<sup>9</sup> However, the WB6 countries must initiate progress in engaging VLOPs, as was the case during the electoral process in Moldova.<sup>10</sup>

## **Priorities for the Berlin Process and Civil Society Forum in 2025**

### **Civil Society Forum 2025:**

In light of the new global uncertainty threatening the role of CSOs and undermining their efforts to protect fundamental rights by building resilience against disinformation and harmful content campaigns, the Civil Society Forum 2025 should reaffirm the crucial role of CSOs and the media in the democratization of the WB6. This should include enabling robust monitoring and protection mechanisms for civic engagement, including tailored, timely, and targeted support. Reaffirming the necessity for stronger cooperation among the CSOs and think tanks from Western Balkans and the European Union would encourage civic activism in the region.

Considering that the continuity of recommendations gives sustainability to the resulting actions, the Civil Society Forum 2025 should reaffirm the recommendations that are seen as relevant and realistic by the different stakeholders during the advocacy process which has taken place in 2024 and 2025. In that regard, the Civil Society Forum should continue promoting WB6 alignment with DSA and EMFA while pursuing a balanced approach which addresses disinformation and abuse in online spaces without compromising fundamental rights and media freedom. This must remain a central consideration for the Civil Society Forum and the Berlin Process in 2025.

Although the EU has reiterated its support for closer cooperation with VLOPs in the Western Balkans, meaningful progress depends on proactive engagement from WB6 governments, as demonstrated by Moldova during its electoral process. Without such an initiative, the EU’s role remains limited. Therefore, the Civil Society Forum 2025 should prioritize

7 Adamović Jelena, Bajić Mila, Bajčeta Snežana, Perkov Bojan, and Stevanović Tijana, DSA, DMA, AIA and Western Balkans, The Share Foundation, 2024, <https://osfwb.org/wp-content/uploads/2024/07/DSA-DMA-AI-Study.pdf> (accessed April 22, 2025); “Towards the Feasible Implementation of the Digital Services Act in the Western Balkans: Are the Countries of the Region Ready?,” in: SEE Check, September 15, 2024, <https://seecheck.org/index.php/2024/09/15/the-study-towards-the-feasible-implementation-of-the-digital-services-act-in-the-western-balkans-are-the-countries-of-the-region-ready/> (accessed April 22, 2025).

8 European Commission, Montenegro 2024 Report – Accompanying the Document – Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, and the Committee of the Regions - 2024 Communication on EU Enlargement Policy, October 30, 2024, [https://enlargement.ec.europa.eu/document/download/a41cf419-5473-4659-a3f3-af4bc8ed243b\\_en?filename=Montenegro%20Report%202024.pdf](https://enlargement.ec.europa.eu/document/download/a41cf419-5473-4659-a3f3-af4bc8ed243b_en?filename=Montenegro%20Report%202024.pdf) (accessed March 28, 2025).

9 Adria R. Walker, “Meta Terminates Its DEI Programs Days Before Trump Inauguration,” in: The Guardian, January 10, 2025, <https://www.theguardian.com/us-news/2025/jan/10/meta-ending-dei-program> (accessed April 22, 2025).

10 European Commission, Commission Services and Moldovan Authorities Hold Election Readiness Exercise, Online platforms Agree on a Temporary Escalation Mechanism ahead of Moldova’s Upcoming Elections, September 20, 2024, <https://digital-strategy.ec.europa.eu/en/news/commission-services-and-moldovan-authorities-hold-election-readiness-exercise-online-platforms> (accessed March 28, 2025).

encouraging the WB6 to seek EU expertise and assistance addressing disinformation campaign risks and harmful content through the VLOPs, for instance by highlighting the positive steps Moldova recently took.

Artificial intelligence (AI) is widely used in WB6. However, legislation in WB6 is mostly outdated, inconsistent, and inadequate for the systematic regulation of digital ecosystems.<sup>11</sup> Although their digital challenges are more complex than those in EU member states, regulatory change in this field is urgent, and the Civil Society forum should address developing a comprehensive and coherent AI legislation in WB6 in line with the EU's model.

### **Berlin Process 2025:**

In the context of new global uncertainty and the significant risks of democratic backsliding, the Berlin Process 2025 should reaffirm the EU and member states' commitment to protecting vulnerable Western Balkan democracies, thereby signaling a strong dedication to the enlargement process.

While cybersecurity attained considerable prominence in the Chair's Conclusions of the 2024 Berlin Process Summit, it is paramount to reassess the inadequate representation of disinformation and media freedom within this key policy document, particularly in light of the escalating global disinformation campaigns that prominently manifest themselves during electoral processes across Europe.

A resilient and independent media sector constitutes one of the most effective safeguards against disinformation and societal polarization. Nevertheless, the media landscape in the Western Balkans is experiencing increasing strain – financially, politically, and institutionally. The suspension of funding sources, notably from the United States, has compromised the operational capacity of civil society organizations and fact-checkers, thereby undermining their resilience amidst intensifying threats. Disinformation is increasingly weaponized to delegitimize CSOs, while shrinking civic space and adversarial political contexts further inhibit their ability to influence democratic reforms. The Berlin Process should prioritize sustainable support for professional media, CSOs,

and fact-checkers in its 2025 agenda, thereby aiding their capacity to sustain resilience and uphold their watchdog responsibilities.

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11 "Towards the Feasible Implementation of the Digital Services Act in the Western Balkans: Are the Countries of the Region Ready?," in: SEE Check, September 15, 2024, <https://seecheck.org/index.php/2024/09/15/the-study-towards-the-feasible-implementation-of-the-digital-services-act-in-the-western-balkans-are-the-countries-of-the-region-ready/> (accessed April 22, 2025).





