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Public participation in the revised Green Agenda Action Plan

Dear Mr Kapetanović,

We are writing regarding the lack of public consultation on the draft of the revised Green Agenda Action Plan, to be adopted or endorsed at the Dubrovnik Summit on 14 to 15 October 2025. We are also asking the RCC to provide more details on its Green Agenda activities so far and plans for 2026.

The revision of the Plan was a long-awaited chance to finally produce a more streamlined and focused Action Plan that sets clear responsibilities, steps and deadlines, demonstrates the added value of the Green Agenda compared with actions that the countries were already obliged to do, and clearly sets out how progress will be measured.

It should also have contributed to restoring trust between the RCC and civil society organisations, which was severely eroded during the development of the 2021 Action Plan,[1] and has continued due to the planned NGO Forum never being implemented, with the exception of a single conference in Belgrade in March 2023.[2]

Given the multiple staff changes since 2021 in the RCC and what is now DG ENEST, we knew it was not guaranteed that lessons would be learnt from the development of the previous Action Plan. Thus in the last 18 months, CSOs have provided proactive input aimed at ensuring a participatory process and a more focused and better-structured Action Plan:

- In May 2024, 30 environmental groups wrote to the RCC and European Commission to ask for a multi-stage consultation process, first collecting pre-draft inputs on how the existing Action Plan should be changed, then consulting two successive drafts of the updated one.[3] The RCC acknowledged the letter.
- In October 2024, civil society groups circulated joint NGO proposals on the GAWB Action Plan, both on Parts 1 and 2 - Action Plan and Roadmaps and Part 3 - Governance, monitoring,

[1] No public consultation took place on the plan. CSOs had been asking the RCC for inclusion in the process for months in advance, but the draft Plan was shared with selected NGOs just two weeks before the Summit, who were asked to give joint input within just one week. This prevented any meaningful consultation as it was not possible to develop and agree on comprehensive comments in such a short time, and even if it had been possible, there was no chance of them being taken into account before the endorsement. We expressed our dissatisfaction and in a meeting between several CSOs, the RCC and the then DG NEAR, the institutions admitted that the process had been flawed and stated that lessons had been learnt.

[2] The conference included various panel discussions and presentations of the preliminary results from the first implementation report, but did not include proposals on what the Forum would do in the future, how it would be structured, who could participate, how, or what would happen in what timeline. Several participants tried to raise such questions but the answers provided by RCC staff did not clarify these issues or provide any commitments to inform CSOs about upcoming events and processes.

[3] Shortly before this, CEE Bankwatch Network also provided feedback on the first Green Agenda Implementation Report, which covered 2022, in order to propose improvements needed in future editions and the upcoming Action Plan revision. The implementation reports so far have not been able to clearly state which points have been completed, how this is measured, whether the progress made has been the result of the Green Agenda or would have happened anyway, and who is responsible for further action on points where no progress has been made. As a result, it is currently impossible for civil society groups or the general public to understand where implementation is really at and how much the Green Agenda adds value compared to EU accession and pre-existing regional Treaties. Many of these weaknesses stem from the Action Plan itself. In the accompanying email, Bankwatch also asked for a meeting with the RCC. The RCC responded with an acknowledgement email but did not comment on the request for a meeting.

reporting and other mechanisms to support the implementation of the Sofia Declaration. The RCC acknowledged the input.

In February 2025, Climate Action Network Europe and CEE Bankwatch Network wrote to invite you for an introductory meeting to discuss the Green Agenda. This resulted in a meeting with the programme staff held on 31 March.

At the meeting, RCC staff stated that there would be two rounds of public consultation during the Action Plan revision – a pre-draft call for input starting in early April, and a later one on the draft, likely in July, for two or three weeks, with a later online event to discuss inputs.

The pre-draft consultation was indeed held in April as planned, and some CSOs provided input. Nevertheless, it was restricted to commenting on the actions from the existing Action Plan rather than the whole document including the Roadmaps, governance, indicators etc. The format was also rather limiting.[4]

CEE Bankwatch Network and Climate Action Network Europe therefore wrote to the RCC in May to offer feedback and request a more flexible format for the next public consultation. They also asked for a consultation period of at least 30 days. The RCC did not respond.

On 1 July Bankwatch wrote to the RCC again to ask about the timing for the public consultation on the draft. The RCC replied promptly, stating that it could start by mid-August, followed by a dedicated meeting with CSOs in early September, but that the timeline would depend on the pace of feedback from the WB6 governments on the draft.

Having received no further news or notifications on the consultation, Bankwatch wrote to the RCC again on 22 August and again on 1 September. The RCC replied only on 29 September, without clearly stating whether there would finally be a public consultation or not, and if not, what had changed since it previously planned to hold one.

In the email, the RCC apologises for the delay in responding, underlines that previous CSO input had been taken into account, and states that '*the RCC cannot influence the overall dynamics or timing of the formal approval process, which remains in the hands of the WB6 governments.*' Although ambiguous, we assume this means the RCC cannot delay the adoption or endorsement of the revised Action Plan at the Dubrovnik Summit, and that no public consultation will be held.

This situation is unacceptable, in particular because the RCC committed to holding a public consultation. Pre-draft consultations are welcome and necessary, and we understand that it was useful for CSOs to provide early pro-active input, but these can never be a substitute for a public consultation on the draft. Such a consultation should have been built into the timeline from the start, especially as the need for this was highlighted by CSOs in a timely manner. It cannot have been a surprise that the adoption or endorsement could take place as early as October, since last year's Hamburg Summit was also held around the same time.

[4] The format made it difficult to suggest additional Actions or Indicators as the tables were not easy to work with. Some users reported difficulty in editing the downloaded documents at all, as the tables did not appear editable. There was also limited space for justifications on the interventions.

Backtracking on consultation commitments breaches the already undermined trust between CSOs and the RCC. It also runs contrary to the spirit of the UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters and sets a very poor example to the region's governments. It is also very likely to affect the quality of the final Plan and undermine society's buy-in of the Green Agenda.

Regrettably, this is not an anomaly, but as outlined above, has been the standard practice since the Green Agenda began. Civil society groups have consistently supported the GAWB's goals, but we can only be effective in contributing to and monitoring implementation, and ensuring public buy-in, if we are consulted on the Action Plan and other documents.

The stakes are high, and we have already lost too much time. The Green Agenda must become more efficient and participatory if it is to achieve results. We therefore ask you for:

- A year-by-year breakdown of the EU funds received by the RCC for the implementation of the Green Agenda;
- A year-by-year breakdown of how the funds have been spent and what has been achieved by the RCC,[5] including how much on salaries, consultancies for the development of the Action Plans, implementation reports and other purposes; communication materials, meetings, the NGO Forum meeting in Belgrade on 30 March 2023, and other costs;
- A workplan of RCC activities for 2026 on the Green Agenda;
- An outline of steps foreseen to ensure the implementation of the revised Action Plan (i.e. how countries will commit to specific actions, how they will plan their implementation, at what stage the public will be consulted etc.).

If any of these are not yet available (e.g. workplan for 2026), please send the other items as soon as possible and others as they become available. Nevertheless, we would very much welcome receiving the documents within the next 30 days in order to align our own plans for 2026 with them.

We very much regret that half way through the Green Agenda implementation period we are still having to ask for basic information about what has been done and what is planned, and hope that with a new Action Plan and clearer steps in place, 2026 will finally be the year that Green Agenda implementation steps up.

Yours sincerely,

Pippa Gallop,

Southeast Europe energy policy officer,

CEE Bankwatch Network

[5] Not the overall Green Agenda Implementation Reports, but specifically what has been done by the RCC.

On behalf of the following civil society organisations:

1. Aarhus center in BiH	Bosnia and Herzegovina	
2. Advocacy Center for Democratic Culture - ACDC	Kosovo	
3. Balkan Green Foundation	Kosovo	
4. Belgrade Open School	Serbia	
5. Centar za promocija na kultura i turizam-Skopje	North Macedonia	CPKT
6. Center for Climate Change	North Macedonia	
7. Center for Civil Society Promotion	Bosnia and Herzegovina	
8. Center for Ecology and Sustainable Development- CEKOR	Serbia	
9. Center for Environment	Bosnia and Herzegovina	
10. Center for Protection and Research of Birds (CZIP)	Montenegro	
11. CEE Bankwatch Network	Regional	

12. Climate Action Network Europe	Regional	
13. Dinarica, Mostar	Bosnia and Herzegovina	
14. EC Ma Ndryshe	Kosovo	
15. EcoAlbania	Albania	
16. Eco Logic	North Macedonia	
17. Eco-team	Montenegro	
18. EcoZ	Kosovo	
19. Eko akcija	Bosnia and Herzegovina	
20. Eko forum Zenica	Bosnia and Herzegovina	
21. Eko-svest	North Macedonia	

22. Environmental center for Development Education and Networking (EDEN)	Albania	
23. ERGOS	North Macedonia	
24. European Environmental Bureau	Regional	
25. Fondacioni Jeshil	Kosovo	
26. Friends of nature EKO ELEMENT	Bosnia and Herzegovina	
27. Go Green association for sustainable development and environmental protection, Skopje	North Macedonia	
28. Green Home	Montenegro	
29. Green Team	Bosnia and Herzegovina	
30. Institute for Nature Conservation in Albania	Albania	

31. Inženjeri zaštite životne sredine	Serbia	
32. iRevolucija	Serbia	
33. “Kalem-enje” Association of wine consultants and educators - Skopje	North Macedonia	
34. Koalicija za održivo rudarstvo u Srbiji- KORS	Serbia	
35. Milieukontakt Albania	Albania	
36. NGO “New way”	Serbia	
37. OMM Gjethi	Kosovo	
38. Organic Agriculture Association	Albania	
39. “Porecje” NGO - Vucje	Serbia	
40. Protection and Preservation of Natural Environment in Albania (PPNEA)	Albania	

41. PRO.TOK21	Serbia	
42. Reconciliation Empowering Communities - REC NGO	Kosovo	
43. Regional Action Lab (Re-ACT Lab)	Regional/Kosovo	
44. Renewables and Environmental Regulatory Institute	Serbia	
45. RES Foundation	Serbia	
46. Society for Research and Protection of Biodiversity	Bosnia and Herzegovina	
47. Team 42	Serbia	
48. USR “Deliblatsko jezero”	Serbia	
49. Velo Schools	North Macedonia	

50. Young Researchers of Serbia	Serbia	
51. ZEOOOP	North Macedonia	
52. 7 arte	Kosovo	

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