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Between Geopolitics and Enlargement: Reconfiguring Pre-Accession Assistance in the Next EU Budget*

- The proposed Global Europe Instrument reshapes the EU's pre-accession assistance for the Western Balkans by integrating enlargement funding into a broader external action framework, increasing flexibility but presenting new challenges for both the predictability of support and its anchoring in the accession process.
- To preserve the credibility of the enlargement process, the next Multiannual Financial Framework should ensure dedicated and predictable funding, strengthen strategic programming and balance flexibility with safeguards that protect accession priorities from shifting geopolitical and political pressures.
- Performance-based financing can improve effectiveness, provided it is supported by clear implementation rules, governance and financial arrangements tailored to support the EU enlargement process.

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The EU enlargement policy stands at a critical point. After years of stalled progress, Montenegro's accession treaty is being prepared, while three other Western Balkan (WB) countries, along with Ukraine and Moldova, are engaged in accession talks. The Union has begun tentative discussions on institutional reform to accommodate a larger membership, while negotiating phased-entry plans to support candidate countries as they progress towards full membership.

The renewed focus on enlargement coincides with the fundamental redesign of the EU's budget. The European Commission's proposal for the 2028-2034 Multiannual Financial Framework (MFF)[1] folds accession assistance into a single, more flexible architecture, the Global Europe Instrument (GEI),[2] alongside neighbourhood cooperation and broader external action, with a sharper focus on the EU's geopolitical and economic interests.

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1 European Commission, *A Dynamic EU Budget for the Priorities of the Future – The Multiannual Financial Framework 2028-2034* (COM/2025/570), 16 July 2025, https://eur-lex.europa.eu/legal-content/en/TXT/?uri=celex:52025DC0570.

2 European Commission, *Proposal for a Regulation Establishing Global Europe* (COM/2025/551), 16 July 2025, https://eur-lex.europa.eu/legal-content/en/TXT/?uri=celex:52025PC0551.

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The Western Balkans now compete for funding within a single pillar alongside neighbourhood countries and non-candidate states

This redesign creates a fundamental tension. Pre-accession assistance has historically been treated as a separate category within EU external action – with its own regulation, ring-fenced funding and governance tailored to accession. The GEI dissolves that separation.[3] The Western Balkans now compete for funding within a single pillar alongside neighbourhood countries and non-candidate states, under criteria that serve the EU's broader geopolitical interests as much as accession itself. Whether the accession logic with predictable funding, tailored conditionality and dedicated governance can survive within this more flexible, geopolitically driven architecture is an open question.

1. Global Europe Instrument and the European pillar: Key novelties for the Western Balkans

The GEI's 200 billion euro budget represents a nominal increase of roughly 70 per cent over the current MFF. Pre-accession assistance for the Western Balkans now sits within the 43.17 billion European pillar – the "Enlargement and Neighbourhood East" (ENEA) region –, which also covers Eastern neighbourhood and other European countries, including microstates and advanced Western European economies such as Norway and the United Kingdom – countries that have barely drawn on EU external action instruments so far. Programmable and non-programmable funds[4] are housed within the pillar without distinct allocations.[5] The mechanism allows reuse of unspent annual appropriations, repayments by financial instruments as well as the outstanding budgetary guarantees.[6]

Under the current 2021-2027 cycle, Europe-focused external action instruments already provide roughly 39-40 billion euros: Instrument for Pre-accession Assistance (IPA) III for the Western Balkans and Turkey (14.16 billion), the Reform and Growth Facility (RGF) (6 billion, split into 2 billion grants and 4 billion loans) and the NDICI Neighbourhood pillar (at least 19.3 billion). Against this baseline, the newly devised European pillar's 43.17 billion is a nominal increase of only 9-13 per cent – far below the instrument-wide 70 per cent. A more precise comparison remains difficult at this stage as the country groups are not identical[7] and all figures are in current, not real, prices, which matters given persistent EU inflation.

The first shift concerns how the money is allocated. Unlike IPA, which maintained an indicative country/region allocation logic, or the RGF, which used population- and GDP-weighted ratios, GEI does not guarantee any predetermined financial allocation for the Western Balkans or the wider enlargement portfolio. Individual country's amounts will instead emerge from

3 The European Parliament's draft report on the regulation proposal and the Council' partial mandate on Global Europe suggest that both co-legislators align with the European Commission proposal on merging the external action funding instruments into one.

4 Non-programmable assistance includes humanitarian aid and micro-financial assistance. Competitiveness and resilience are now treated as separate components of the non-programmable assistance.

5 Heckhausen, Anna and Katharina Staudte, "What's Next for Global Europe? Unpacking the MFF Proposal", in *BSt Europe*, 1 April 2026, https://bst-europe.eu/?p=39861.

6 European Commission, *Proposal for a Regulation Establishing Global Europe*, cit.

7 The calculations are based on EU budget allocations as per the instruments' respective regulations, and do not factor in actual spending. The Reform and Growth Facility for Moldova and the Ukraine Facility are not included in the calculations.

Pre-accession assistance for the Western Balkans now sits within the 43.17 billion European pillar – the "Enlargement and Neighbourhood East" region

the Multiannual Indicative Programmes (MIPs), at the country, regional (art. 15) and global (art. 16) level. This means that the Commission, and possibly the Council, will decide how much each country receives after the regulation is adopted, rather than this being fixed in law. How MIPs can later be revised remains disputed between the European Parliament and Council.

A second, related change concerns the goals. The European pillar should help countries prepare for membership (the "accession logic") and build mutually beneficial partnerships through association and stabilisation agreements (the "partnership logic"). The accession logic places greater emphasis on the "fundamentals" by strengthening support for the first cluster of accession negotiations – rule of law and democratic governance – while explicitly embedding the gradual integration in the design of financial assistance. Rather than being driven by the beneficiaries' accession process, the partnership logic is driven by the pursuit of mutually beneficial objectives, with the Union's strategic interests and geopolitical competition at its core. Both logics – membership and partnership – include a new geoeconomic focus with the aim of reducing dependencies and integrating beneficiaries into the EU's supply chains. Support for employment, education, social protection, gender equality and civil society are in function to address socio-economic convergence and competitive market pressures under the accession objective, while a more traditional understanding of these policies in terms of decent jobs, quality of education and inclusion is preserved in the partnership objective. Finally, a subset of specific objectives for regional cooperation, a regular practice in IPA, is now addressed through one broad cross-border cooperation objective.

A third change concerns the funding criteria. The GEI proposal keeps IPA III's main selection principles – policy relevance, progress on the enlargement agenda and technical maturity[8] – but strengthens them (art. 14.2). Progress on the enlargement agenda becomes even more central and tied explicitly to "results in the areas of political reform, economic and social development and convergence towards the EU acquis".[9] Technical maturity is reframed as absorption capacity, reinforced to account for the financial impact on the Union's budget and the beneficiaries' ability to mobilise financial resources. Policy relevance in programming is maintained and broadened to account for the partnership status, the promotion of mutual interests and the Union's strategic interests. The country's commitment to addressing irregular migration and to promoting shared values and principles in multilateral alliances is added as new criterion for prioritisation in programmes and actions.

The fourth, and arguably the most consequential novelty, is the shift toward performance-based plans (PBPs), following the EU's wider move to performance-based budgeting.[10] This approach mirrors the RGF conditionality model where disbursements depend on delivering pre-agreed reform steps.

8 European Commission, *Commission Implementing Decision of 10 December 2021 Adopting the Instrument for Pre-Accession Assistance (IPA III) Programming Framework for the Period 2021-2027* (C/2021/8914), https://enlargement.ec.europa.eu/node/3720_en.

9 European Commission, *Proposal for a Regulation Establishing Global Europe*, cit. The proposal explicitly states programming towards the ENEA region shall be tailored based on these elements. The Council proposes further breakdown of accession countries: acceding, candidate and potential candidates in the context of pursuit of the specific objectives.

10 Hansum, Romy et al., "Ripe for Reform – What's in the EU Budget Proposal and What Should Come Next", in *Jacques Delors Policy Briefs*, 1 August 2025, https://www.delorscentre.eu/en/publications/detail/publication/ripe-for-reform-whats-in-the-eu-budget-proposal.

However, the draft regulation provides few details on these country programmes, which will be defined later in an implementing act. This act foreseen under Article 31 will establish uniform conditions governing the design and content of PBPs, the payment conditions and assessment procedures as well as the management structures and control systems for ENEA beneficiaries. The European Parliament and Council's positions indicate that this act will be a central piece of the negotiations in the context of enlargement funding.[11]

Fifth, the toolbox available for spending the money relies on usual channels – grants, procurement, sector budget support, financial instruments, guarantees and blending (art. 23). However, there is a notable novelty: the Commission put forward a proposal to award grants directly to EU-based companies, without a call for proposals, to unlock investment in critical raw materials or digital infrastructure. It can also award simplified, low-value grants to human rights defenders or civil society and media in areas in conflict or with a significant lack of fundamental freedoms (art. 23). Policy-based loans become a standard tool, either as macro-financial assistance or tied to a country's performance-based plan (art. 26). The overall budget guarantee has been scaled up tto expected 100 billion euros. The final shape, scope and application of these instruments remain subject to negotiations between the co-legislators.

Lastly, the GEI proposal introduces two new governance bodies: a Global Europe Investment Board overseeing guarantee and blending operations (art. 25.6) and a Global Europe Committee involved in preparing and approving implementing acts such as MIPs. Both could override existing regional structures, notably the Western Balkans Investment Framework (WBIF) Boards, and IPA and Monitoring Committees from the IPA III and RGF respectively.

2. Support for enlargement and preparation for membership in Global Europe

2.1 Allocation and (re)distributions mechanism in and between the European pillar

›› Without specific allocation, the instrument makes no clear commitment to enlargement priorities

The absence of a fixed allocation interrelates with a second problem: the candidate countries are not a stable group. The current cohort resembles the "big bang" of 2004, when eight Central and Eastern European states (plus Cyprus and Malta) joined all at once. But unlike that round of enlargement, only one candidate, Montenegro, has a clear path to membership within the next MFF, while new aspiring countries may join later and require support. The logical answer is to allow the EU to streamline enlargement and neighbourhood policies, enabling quicker responses to partners' priorities.[12] The new "country/region" grouping for the Europe pillar allocation is understandable, then – but just in part.

11 The Council insists to hold the power to adopt the implementing rules as well as the PBPs for each beneficiary with Council implementing acts, rather than Commission implementing acts as initially proposed. The European Parliament proposes the implementing rules to be adopted by the means of a delegated act to ensure stronger democratic scrutiny.

12 European Commission, *Proposal for a Regulation Establishing Global Europe*, cit.

Without specific allocation, the instrument makes no clear commitment to enlargement priorities. The European Parliament and several Western Balkan civil society organisations argue that dedicated, predictable funding would signal political commitment, enhance visibility and give governments confidence that funding for politically and technically costly reforms will not be reallocated to competing priorities.[13]

The (re) distribution mechanisms and equity safeguards matter too

The (re)distribution mechanisms and equity safeguards matter too. IPA III introduced a fair-share principle with mandatory annual reporting to the IPA Committee – balancing rewards for top performers and disproportionately low allocations for any single country.[14] The RGF instead used population- and GDP-weighted ratios. Its incentive structure to top up allocation of the top performers at the expense of reform laggards resembles the GEI reallocation mechanism. Both options in the GEI proposal, the "ad hoc" MIP revisions proposed by the Commission, and the Council's "mid-term" revisions are strong redistribution mechanisms with no explicit caps and constrains. The implication of these redistribution mechanisms cannot be assessed yet as the revisions to the Reform Agendas have yet to take place. The enlargement portfolio includes countries and regions at different stages in the accession process, in different political contexts, with varying financial needs, and with varying capacities to deliver reforms. Revisions without equity safeguards risk concentrating limited funds on well-positioned, top performers, at the expense of underperformers who most need support – a risk compounded by region-specific crises or shifting EU political priorities.

While the Council's and Parliament's positions seek greater role in decisions on the allocation and reallocation of funds, neither challenges the Commission's core architecture by proposing a dedicated financial envelope for enlargement or introducing explicit equity safeguards for redistribution. As a result, considerable discretion remains over how resources are allocated across competing priorities. While this may improve the EU's ability to respond to short-term political developments, it may also reduce the predictability and transparency needed for candidate countries to plan long-term reforms and investments in support of the accession process.[15]

2.2 An enlargement-focused programming approach

Previous IPA rounds were anchored to strategic documents. An indicative multi-year strategy under IPA II and a Commission-led programming framework with country responses under IPA III were built around predefined policy areas.[16] These articulated the EU's intervention logic, clarified priorities and sequenced reform support and investments. Though beneficiaries sometimes failed to

13 Albanian Centre of European Policies et al., *Integrating Enlargement into the MFF 2028-2034: A Strategic Financial Commitment to the Western Balkans, Republic of Moldova and Ukraine*, 13 October 2025, https://europe-plus.com/wp-content/uploads/2025/10/EC_Joint-letter_enlargement-in-MFF-20282034.pdf.

14 European Commission DG for International Partnerships, *European Union's External Financing Instruments (2014-2020 and 2021-2027). Volume I: Synthesis Report*, Luxembourg, Publications Office of the EU, March 2024, https://data.europa.eu/doi/10.2841/05549.

15 Jones, Alexei, "A Companion Guide to the Global Europe Instrument Proposal", in *ECDPM Briefing Notes*, No. 198 (July 2025), https://ecdpm.org/work/companion-guide-global-europe-instrument-proposal.

16 IPA I was organised around five components, IPA II had a framework of five predefined policy areas and IPA III is organised around five thematic "windows".

navigate and make full use of the potential of such support, these overreaching documents still reinforced the instrument's legal framework[17] and helped maintain strategic coherence of EU assistance beyond annual programming decisions.[18]

The GEI departs from the "umbrella programming" for a more flexible approach. Strategic objectives will be translated directly into country- and region-specific MIPs (art. 17) and later into action-level plans (art. 19). Without an overarching document, key questions risk not being paid the attention they deserve: how the accession and partnership logic objectives interact; how the programming criteria are sequenced, particularly the "fundamentals first" approach; and how these affect programming priorities, the very policies (areas) of intervention and investments that are to be prioritised. The instrument's link between funding and the gradual integration approach further complicates this sequencing as the EU is not in agreement on what enhanced pre-membership integration beyond the RGF could look like.[19] As such, country and regional programming documents and their revisions risk being driven by Commissions and Council's' interests rather than a coherent framework tailored to the beneficiary reform trajectories, becoming reactive and even less transparent.

›› ***Country and regional programming documents and their revisions risk being driven by Commissions and Council's' interests rather than a coherent framework***

2.3 A shift toward performance-based plans for better reform outcomes

Performance-based plans or PBPs have real merit in principle: tying disbursements to measurable reform delivery. This approach protects the EU's value-for-money and strengthens incentives. It echoes the logic used for member states' own funding and could double as a preparatory exercise for membership. Two ambiguities remain, though. First, the nuances between the membership and partnership objectives raises the question of whether and how the regulation can limit the PBPs scope and streamline intervention priorities. Second, it is unclear how far the performance-based logic will actually apply across beneficiaries. Besides these, several issues emerging from the RGF implementation warrant careful consideration.

The four-point weighted scale for pricing reforms has resulted in a low degree of consistency in terms of rewards-per-reform between and within Reform Agendas.[20] This corresponds to Recovery and Resilience Facility issues on unclear cost calculation and reimbursement on the reform level.[21] Funding linked to individual reform steps is often fragmented into incremental rewards that may slow down the efforts required to deliver ambitious reforms. Moreover, grants and part of loans go to the WBIF and the other part of loans

17 Institute for Good Governance and Policies in Environment and Climate Change (IPECC), "Instrument for Pre-Accession Assistance (IPA) to WB6: Opportunities, Challenges and Paths Forward", in *IPECC Policy Papers*, November 2024, https://osfwb.org/?p=5786.

18 European Commission DG for International Partnerships, *European Union's External Financing Instruments (2014-2020 and 2021-2027). Volume I: Synthesis Report*, cit.

19 Lippert, Barbara et al., "EU Enlargement: Ukraine as a Special Case – The Western Balkans as the Norm", in *SWP Comments*, No. 17 (April 2026), https://doi.org/10.18449/2026C17.

20 Miljenović, Ranka and Milena Mihajlović Denić, *Comparative Analysis of Four Reform Agendas and Key Directions for Civil Society Monitoring*, Skopje, European Policy Institute (EPI), January 2025.

21 European Court of Auditors, "Performance-Orientation, Accountability and Transparency – Lessons to Be Learned from the Weaknesses of the RRF", in *ECA Reviews*, No. 2 (2025), https://www.eca.europa.eu/en/publications?ref=rv-2025-02.

to the treasury. The RGF money flows are designed in a way that reform implementing authorities are not guaranteed that they will be rewarded or, rather, compensated for the implemented reforms and investments.

Reform delivery requirements differ in depth and breadth and at times are ambiguous. Biannual Commission assessments suggest that the Commission and the beneficiaries have not always shared the same understanding of the milestones and expected deliverables, reform outcomes, and what counts as "satisfactory fulfilment", particularly for the qualitative ones.[22] These shortcomings matter given the accession process and acquis alignment requirements, and part of the problem is design itself. Beneficiaries are not always knowledgeable on acquis alignment requirements, yet the RGF logic relies heavily on ex-post assessment rather than on support throughout reform preparation (technical assistance). As reform requirements become more demanding, administrative steps may not align with the expectations placed on beneficiaries. Without early engagement between the Western Balkans administration – which often have limited capacity – and relevant Commission DGs or independent experts (twinning projects), satisfactory results are unlikely.

Should PBPs become the standard, they would resemble the beneficiary-led strategic documents used in previous MFF cycles. Many institutions outside the core accession ministries – in policy areas such as agriculture and rural development – have no socialisation with the RGF performance-based logic and little capacity to translate reform commitments into costed, measurable milestones. The implementing act will address the implementation structures and control systems requirements but says little about systematic assistance in the (pre-) programming phase, while a wide range of institutions across all six countries would need to be genuinely equipped to participate.

›› An instrument designed to accelerate accession-related reforms and socio-economic convergence may yield mixed or even disappointing results

In practice, three of the six beneficiaries – Bosnia and Herzegovina, Kosovo and Serbia – have not benefited much from the existing similar instrument,[23] and even those countries with more consistent implementation capacity are behind schedule. Before deciding on the definitive approach, the EU should reflect on how the performance-based model has worked in practice: with grants and loans tied to reform delivery, large infrastructure projects – needed both for the beneficiaries and the Union's own strategic interests – remain stuck, awaiting funding. An instrument designed to accelerate accession-related reforms and socio-economic convergence may yield mixed or even disappointing results.

2.4 New governance bodies

The two new governance bodies introduced above, the Global Europe Investment Board and the Global Europe Committee, have already created

22 European Court of Auditors, *Opinion No. 01/2024 Concerning the Proposal for a Regulation of the European Parliament and of the Council on Establishing the Reform and Growth Facility for the Western Balkans*..., 7 February 2024, https://www.eca.europa.eu/en/publications?ref=OP-2024-01.

23 Bosnia and Hercegovina still has not ratified the Facility and Loan Agreements while Kosovo just recently ratify the agreements following deadlock in the Parliament. As such, both were unable to claim RGF funds in its first two years of implementation. The European Commission announced that it will withhold Serbia's funds until it reverses judicial laws. another example where deadlines may pass by.

some tension between the Commission and the co-legislators over control. Push-back against the originally proposed centralised architecture has led the Council to insist both bodies may "convene in different formats"[24] – a positive shift toward region-focus governance for reforms and investments, though not without caveats. On the investment side, this change allow regional boards to take investment decisions rather than one with a global mandate. In the context of the WB, the Western Balkans Investment Framework has evolved its governance structure and operational procedures as a single-entry point for blending EU and bilateral donor grants with international financial institutions (IFIs) loans since its establishment in 2009. With the growing interest in blending operations, budget guarantees make the governance of investment operations even more relevant. For those involved in the planning and execution of infrastructure pipelines across the region, maintaining this framework would remove significant adjustment costs as well as governance and operational risks associated with new procedures that may be ill-suited to the region.

It is equally important, however, to ensure that this framework evolves and improves its functioning. Recent European Court of Auditors' special report on the WBIF challenges the selection procedures for mature projects, reporting and proactive risks mitigation efforts, project monitoring and the adequacy or lack long-term sustainability measures and stronger EU visibility.[25] Three of these recommendations concern ways to improve Commission oversight and IFI transparency on project implementation. The one on mature projects selection, however, matters most for Western Balkan beneficiaries: selection procedures need strengthening across national administrations and within the WBIF itself to ensure that greenlighted projects are to the best benefit both the EU and Western Balkan economies.[26]

The original proposal gave the Commission broad powers to adopt MIPs and actions with standard implementing acts, consulting the Global Europe Committee. The Council rewrites Article 31 almost entirety, handing the authority for the approval implementing act, the PBPs, the Ukraine payment authorisation from the Commission to the Council – and stripping the Committee of its consultative role in favour of a "no opinion, no act" rule at action level. This improves Council control, but risks politicising implementation in the hands of deadlocked member states, hurting the predictability and timeliness of key decisions.[27]

***»* While the governance debate focuses on co-legislators' coordination and decision-making powers, very little attention goes to domestic ownership**

While the governance debate focuses on co-legislators' coordination and decision-making powers, very little attention goes to domestic ownership. The GEI's consultation requirement obliges the European Commission to ensure that consultations happen but leaves beneficiary governments with no explicit

24 Council of the EU, *Proposal for a Regulation of the European Parliament and of the Council Establishing Global Europe. Partial General Approach* (10442/26), 11 June 2026, https://data.consilium.europa.eu/doc/document/ST-10442-2026-INIT/en/pdf.

25 European Court of Auditors, "Western Balkans Investment Framework – EU Support Addresses Connectivity Needs, But Integration into the Core Transport Network Is Slow", in *ECA Special Reports*, No. 16/2026, https://www.eca.europa.eu/en/publications/sr-2026-16.

26 "Open Letter to the EU: CSOs Request Participation in the New WB Investment Framework", in *European Western Balkans*, 15 September 2021, https://europeanwesternbalkans.com/?p=43812.

27 Barana, Luca and Luca Cinciripini, "Ukraine and the Next MFF: The Strive for Predictability", in *IAI Briefs*, No. 26|39 (July 2026), https://www.iai.it/en/node/22612.

legal obligation to foster domestic dialogue. The EU has recognised that broad stakeholder involvement is critical to reform sustainability yet diverging definitions of the partnership principles have left local and regional authorities as mere implementers rather than as strategic partners, and civil society under-involved due to centralised, compressed timelines.[28]

Conclusions and recommendations

The proposed merger transforms enlargement assistance from a dedicated instrument into one component of a broader geopolitical architecture. The central challenge for the next MFF is not only whether enlargement gets more funding, but whether the accession logic, governance and incentives that have long distinguished the enlargement funding from other instruments can survive within a flexible external action framework.

A dedicated envelope with equity safeguards, with embedded IPA-style fair-share rules including for PBPs, is a viable way to sustain predicable funding. In practice, it requires the geographic pillar to be broken further down. Some estimates suggest that at least 20 billion euros in grant is needed for the Western Balkans alone to meaningfully accelerate convergence.[29]

A strategic programming framework for enlargement funding is necessary – a foundation that translates the instrument's broad objectives into a coherent intervention logic aligned with Western Balkans specific needs. Delays in preparing the programming framework and strategic responses, under IPA and Reform Agendas, affected execution timelines. Thus, the timely delivery of such document is essential.

Performance-based plans are welcome in principle, but the implementing act must resolve whether they will replace or complement other country and regional MIPs. Combining the operational lessons of both IPA and the RGF will be critical. Substantial consideration must be given to grant-loan ratios both for investments and budget support, technical assistance and administrative capacity-building, as well as technical design of milestones and indicators, and assessment methodologies. These elements must be rightly defined. Quantitative and qualitative precision is critical to keeping the implementation framework aligned with and supportive of the beneficiaries' actual accession process.

Finally, streamlined governance should optimise administrative efficiency without diluting enlargement-specific operational expertise. The upcoming operational architecture should explicitly preserve the WBIF role in managing, while improving its investment pipelines delivery. At the same time, core programming and action-level decisions should have institutional safeguards to ensure that these processes do not fall victim to bilateral deadlocks or the volatility of the political agenda.

28 European Committee of the Regions, *Reform and Growth Facility: What Local and Regional Authorities in the Western Balkans Need to Know*, Luxembourg, Publications Office of the EU, 2026, https://data.europa.eu/doi/10.2863/4409876.

29 OSF, *Preserving the Enlargement Logic and Civic Space within the Future Global Europe Instrument*, forthcoming.

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