



THE GREEN AGENDA FOR THE WESTERN BALKANS – AN EXERCISE IN EXPERIMENTALIST MACRO-REGIONAL GOVERNANCE

John R. Moodie¹ , Alberto Giacometti² , Miia Itänen¹ , Erblin Berisha³ 

¹ Nordregio Research Institute for Regional Development and Planning
Holmamiralens 10 Väg Stockholm SE-11186: Sweden,
john.moodie@nordregio.org • miia.itanen@nordregio.org

² University of Stavanger, School of Business and Law
Mail box 8600 4036 Stavanger: Norway
alberto.giacometti@uis.no

³ Interuniversity Department of Regional and Urban Studies and Planning (DIST), Politecnico di Torino
Viale Pier Andrea Mattioli 39 10125 Torino: Italy
erblin.berisha@polito.it

Abstract. The Green Agenda for the Western Balkans (GAWB) aims to build transnational cooperation in the Western Balkan (WB) region under key green agenda policy themes. This article explores whether the GAWB development and implementation process reflects an exercise in experimentalist macro-regional governance in the WBs. The GAWB process is examined through the lens of experimentalist governance and its four core dimensions. The assessment indicates that an experimentalist macroregional governance logic is driving GAWB processes, which promote coherence between WB countries under green agenda policies. The GAWB, therefore, lays the foundations for future macro-regional strategy building within the WB region.

Keywords: experimentalist governance, macroregional strategies, transnational cooperation, green transition, Western Balkans.

Introduction

Transnational cooperation between Western Balkan (WB) countries is not a new phenomenon (Trkulja & Dabović, 2021). WB countries (except for Albania) have already experienced union under Yugoslavia between 1918 and 1992 and path dependencies related to economic trade links and physical infrastructure remain from that period. Cooperation between WB countries and other European states is also commonplace, fostered through European Union (EU) accession proceedings under the Berlin Process, the Instrument for Pre-Accession Assistance (IPA), and the Western Balkans Growth Plan. Cooperation has also been enhanced through the participation of different WB countries in transnational frameworks, including the South-East European Cooperation Process (SEECP) as part of membership of the Regional Cooperation Council (RCC), the Central European Free Trade Agreement (CEFTA), and direct involvement in core EU Cohesion Policy pillars, including EU macro-regional strategies and Interreg programmes (Solly

& Berisha, 2021). Consequently, WB countries are not isolated islands, and strong transnational connections already exist and continue to develop between WB countries and other Eastern European states.

One of the most recent efforts in transnational cooperation building in the WB region is the development of the Green Agenda for the Western Balkans (GAWB). The 2020 Sofia Declaration outlined the need for a GAWB which is a growth strategy for the WB Region designed to support climate and energy transitions (RCC, 2020). The GAWB, and corresponding 2021 GAWB Action Plan, supports EU accession processes by building policy links and cohesion between WB countries under key green agenda policy themes closely aligned with the EU Green Deal.

This article explores to what extent the GAWB process reflects an exercise in experimentalist macro-regional governance in the WBs. The GAWB design and implementation process is examined through the lens of the concept of experimentalist governance (EG). EG is an approach based on the development of provisional frameworks for action, which are revised considering recursive evaluations of efforts to implement these frameworks in various contexts (Sabel & Zeitlin, 2010, 2011, 2012). The article examines GAWB processes against the four main dimensions of the EG concept: 1) setting framework goals; 2) low level units; 3) regular reporting; and 4) periodic revision (Sabel & Zeitlin, 2010). This evaluation allows us to identify the commonalities and differences between the GAWB process and EG approaches which are closely associated with EU macro-region building (Gänzle, 2017, 2018, 2019; Gänzle & Mirtl, 2017, 2019).

The article is structured as follows. First, the concept of EG is introduced, discussing its core dimensions and critically evaluating the conceptual weaknesses. Second, practical examples of EG at the EU level are explored, zooming in on EU macro-regional strategies as a core example of EG in practice. Third, the evolution of transnational cooperation in the WB region is examined up to the emergence of the GAWB. Fourth, the GAWB process is analysed against the four key dimensions of the EG approach. Fifth, the article reflects on the relevance of EG in explaining GAWB processes. Sixth, conclusions are drawn on the GAWB as a potential catalyst for future macro-regional strategy building within the WB region.

The concept of experimentalist governance

In the field of EU studies, a range of different governance concepts have been applied as analytical tools to assess the relationship between different actors, levels, and territories, and the way administrative, political, and private actors collaborate in the development and implementation of EU policy (Gänzle, 2018). While multi-level governance has become the most prominent governance concept in EU academic and policy circles (Hooghe & Marks, 2001), EG has emerged as an alternative tool for explaining EU integration under conditions of crisis and uncertainty (Gänzle, 2018; Zeitlin, 2018).

EG has developed in response to the volatility and uncertainty surrounding contemporary socio-economic and environmental challenges (Sabel & Zeitlin, 2011). For Sabel and Zeitlin (2010), the complexity of modern policy challenges is overwhelming conventional forms of hierarchical government; consequently, alternative modes of governance, based on polyarchy and deliberation, are needed to find effective solutions to contemporary issues. Within this context, EG is regarded as well suited to transnational multi-level governance settings and structures like the EU (Zeitlin, 2018). EG posits that EU integration, policy, and regulatory developments are driven by 'a recursive process of provisional goal setting and revision based on learning' (Sabel & Zeitlin, 2012, p. 1).

The concept is built around four key dimensions linked to an iterative cycle (Sabel & Zeitlin, 2011):

- 1. Framework Goals and Indicators:** Broad framework goals and indicators for measuring their achievement are established by public authorities in consultation with other public and private stakeholders.
- 2. Local Units:** ‘Local units’, including state regulatory agencies and member state authorities, are given discretion to implement these goals according to their own context and requirements.
- 3. Regular Reporting:** Local units are required to regularly report on their performance in meeting framework goals and indicators.
- 4. Periodic Revision:** Framework goals and indicators are periodically revised through a review process that considers newly emerging challenges and opportunities.

EG is considered a form of ‘direct deliberative polyarchy’, which privileges non-hierarchical steering (Sabel & Zeitlin, 2010). This connects EG more closely with Type II multi-level governance which emphasize flexible and dynamic governance where a range of public and private actors collaborate in sector specific areas (Hooghe & Marks, 2003). EG also rejects traditional principal-agent approaches (Sabel & Zeitlin, 2012). Sabel and Zeitlin (2011) note that uncertainty creates the conditions where ‘principals’ (i.e. policymakers) are unclear on what their policy goals are and how to achieve them. This means that principals must be prepared to facilitate multi-actor deliberative dialogues between ‘agents’ (i.e. public and private actors) to stimulate policy learning processes based on agent’s knowledge and expertise (Sabel & Zeitlin, 2011). The central role of agents in EG processes has resulted in criticism that EG promotes undemocratic and technocratic modes of policymaking that privilege governance by unaccountable administrative actors, and experts, over political representatives (Ekert & Börzel, 2012; Fossum, 2012). Paradoxically, however, EG has also been criticised for underestimating the role of existing structures and political actors in policymaking, which suggests that the crucial role of principals and existing hierarchical structures cannot be easily dismissed in EG processes (Börzel, 2012). Sabel & Zeitlin’s (2010) principal-agent distinction may be overstated as both principals and agents must work together effectively in EG settings (Mathieu & Rangoni, 2019). This confirms that EG processes are conducted within multi-level governance settings where elements of both hierarchy (Type 1 multi-level governance) and fluidity are present (Type II multi-level governance).

EG emphasises self-reflection, reciprocal persuasion, and readjustment in line with the thinking of philosophers, such as John Dewey and Karl Popper, who advocated an incremental approach to policymaking where pragmatic policies are subject to re-evaluation and change based on learning (Dewey, 1927; Popper, 1945). Learning is considered a constitutive outcome of EG where actors facing similar challenges can, through open dialogue and evaluation, learn from each other and from different policy solutions that have been implemented (Sabel & Zeitlin, 2012). The framework evaluation dimension of EG (dimension 4) can stimulate learning processes, but what type of learning remains unclear (Ekert & Börzel, 2012). EG has also received criticism that it perpetuates top-down policymaking processes with restricted access to local actors which limits knowledge diversity and learning processes (Jones & Whitehead, 2018). Further research is required on the different types of learning evoked by EG and whether this learning relates to new policy, institutional, organisational, or individual knowledge formulation.

EG is meant to provide policymakers with new knowledge in complex policy areas during periods of uncertainty, however, the iterative nature of EG process based on goal setting and evaluation can be slow, time consuming, and not well suited for crisis periods that require quick decision-making (Zeitlin, 2018). Sabel & Zeitlin (2010) argue that EG can trigger transformative law revision and policy change. Fossum (2012) counters this claim arguing that vague EG frame-

work goals can hinder implementation processes and policy impact. Gerritsen et al. (2022) note that complex evaluation metrics restrict learning potential and the capacity for transformational policy change; while de Búrca (2017) argues that EG's focus on problem solving and metrics can neglect normative and ethical issues at the heart of policy problems. These claims highlight the importance of robust and structured EG processes if EG is going to enhance learning and evoke policy adaptability and change. Many of the challenges outlined here are present in the implementation of EG at the EU level as discussed in the following section.

Experimentalist governance in EU policy practice

For [Sabel and Zeitlin \(2011\)](#), EG is visible across a range of EU policy domains and has become institutionalised with existing EU institutional structures, particularly the work of EU agencies. They argue that EG is not confined to areas of policy where the EU lack competences but occurs in areas where the EU has extensive legislative power, pointing to the EU Water Framework Directive as an example of an iterative EG process where re-evaluation has led to new regulatory standards that have binding force ([Sabel & Zeitlin, 2011](#)). [Gänzle \(2018\)](#) supports this perspective arguing that EU macroregional strategy building is a primary example of EG in practice.

An EU 'macro-region' is 'an area including territory from a number of different countries or regions associated with one or more common features or challenges.' ([EC, 2009, p. 1](#)). Since 2009, four macro-regional strategies have emerged for the Baltic Sea, Danube, Adriatic-Ionian, and Alpine regions. The Commission notes that a macro-region is 1) an integrated framework relating to Member States and third countries in the same geographical area; 2) which addresses common challenges; 3) and benefits from strengthened cooperation for economic, social and territorial cohesion ([EC, 2013](#)). EU macro-regions are viewed as a process of governance experimentation based on territorial rescaling ([Stead, 2014](#)). Territorial rescaling is understood as a redefinition and reorganisation or governance scales precipitating a shift in decision-making practices and actor constellations ([Allmendinger et al., 2014](#)). As administrative boundaries become increasingly contested as the appropriate scales or geography to govern over a specific policy issue, the focus on functionality (e.g. functional areas) or 'groupings of actors with common interests and values' results in the definition of new 'soft spaces' as in i.e., geographies that transcend administrative boundaries ([Stead, 2014](#)). European macro-regions are considered as an example of 'soft space' creation based on an EG logic ([Gänzle, 2018](#)).

EU macro-regions reflect an EG approach as they constitute broad transnational policy frameworks that mobilise institutional and non-institutional actors in the implementation of policy implementation, evaluation, and revision processes ([Gänzle & Mirtl, 2017](#)). In the early stages of developing the macro-regions concept, the European Commission emphasised the three 'no's': no new EU legislation, no new EU institutions and no new EU budget should be used to provide direct and immediate support to the formulation EU macro-regional strategies ([EC, 2009](#)). Macro-regional strategies are, therefore, built on existing EU and national level rules, governance arrangements, and financial resources. Macro-regions follow an EG logic as each macro-region produces a macro-regional strategy, which are accompanied by rolling macro-regional Action Plans that are regularly evaluated and updated considering newly emerging needs, challenges, opportunities, and changing contexts ([Gänzle & Mirtl, 2019](#)).

The challenges associated with the EG concept are also reflected in the practice of experimentalist EU macroregional governance. Firstly, macroregional strategies are often based on broad and vague action plans which leads to weak implementation processes (Gänzle, 2018). Secondly, macro-regions are regarded as top-down processes with limited involvement of sub-national level actors and other key public and private actors (Sielker, 2016). Thirdly, weak monitoring and evaluation structures limits learning and the capacity to revise strategies effectively (Kosov & Gribanova, 2016). While EU macro-regions have their flaws, the process of territorial rescaling and governance experimentation which EU Member States have experienced through EU macro-region building is expected to be replicated in WB countries within the context of EU accession processes.

Transnational Cooperation in the WBs

Transnational cooperation between WB countries and other European states is well established through different intergovernmental platforms, driven by both EU level accession processes and independent regional initiatives based on bi-lateral and multi-lateral agreements between WB countries (Berisha, 2023; Berisha & Cotella, 2024). Moodie et al. (2025) note that existing transnational cooperation can be distinguished between three main types:

- 1. Transnational political cooperation:** Transnational political cooperation occurs through high-level intergovernmental frameworks promoting political dialogue that aim to enhance integration and coherence between WB countries and other European states. For example, the Central Europe Initiative is an intergovernmental forum of 17 Member States in Central, Eastern and South-Eastern Europe that fosters EU integration through increased regional political dialogue and networking. The RCC South-East European Cooperation Process supports developing and maintaining a political climate of dialogue, reconciliation, tolerance and openness towards cooperation around regional policy programmes. The Berlin Process is as an intergovernmental regional initiative aimed at giving new momentum to EU accession processes by providing a framework for closer regional cooperation based on three main pillars: economic growth and connectivity, democracy and rule of law, and resolution of bilateral disputes. The Open Balkan¹ Initiative, involving Albania, North Macedonia, and Serbia, establishes a cooperation framework to facilitate trade, enhance freedom of movement for people and goods, and create a more interconnected regional market.
- 2. Transnational project-based cooperation:** WB countries are actively involved in EU Cohesion Policy programmes participating in transnational projects funded via EU macroregional strategies for the Danube and Adriatic Ionian regions and Interreg transnational and cross-border programmes. In the current programming period (2021–2027), WB countries are participating in Interreg IPA ADRION, EU-MED, Danube, Central Europe, URBACT IV, Interreg Europe, and have an observatory role in ESPON.
- 3. Transnational bottom-up cooperation:** Bottom-up transnational cooperation initiatives have also been launched at different governance and territorial scales and with different objectives, such as, the Network of Associations of Local Authorities of Southeast Europe (NALAS) launched in 2001 that fosters collaboration and knowledge sharing between regional and local authorities. The WB6 Chamber Investment Forum was developed in 2017 by chambers of commerce

¹ Open Balkan has been the subject of debates both within the participating states and beyond since its inception. Despite the leaders of the WB states involved insisting that the initiative primarily has an economic focus, its interpretation has faced criticism from various political parties and political actors (Kocollari, 2023). The initiative has currently lost its initial impetus.

and industry across the WBs to facilitate business dialogue and attract investment into the region. Informal cooperation initiatives, such as the TG-WEB Network, have also been activated by local organisations, universities, and research centres aiming at fostering cooperation and knowledge exchange.

There are several existing frameworks that promote transnational cooperation between WB countries and other European states under green agenda themes. The Energy Community, the Regional Rural Standing Working Group in South East Europe, and the RCC Regional Working Group on Environment and RCC Biodiversity Task Force, all support transnational dialogue and networking to promote sustainable development and environmental protection (Moodie et al., 2025). In 2024, the RCC also launched the Western Balkans Green and Circular Economy Stakeholders Platform that brings together key stakeholders to advance the transition to a circular economy in the WBs (Berisha, 2025, 2026). The RCC coordinated GAWB, however, remains the flagship strategy for promoting transnational cooperation in the WBs under climate and environmental policies. The idea for a GAWB was endorsed during the Western Balkans Sofia Summit in 2020. Building on dialogue between WB national authorities and the EU, the 2020 Sofia Declaration outlined a commitment to addressing key climate and environmental challenges in the WBs (RCC, 2020). The Sofia Declaration gave the RCC the mandate to coordinate the preparation of the 2021 GAWB Action Plan that demonstrated a political commitment of WB countries to work towards adopting EU environmental and climate standards and regulations.

The GAWB is a significant initiative for transnational cooperation building in the WBs as it focuses solely on identifying green agenda policy synergies between WB countries without the involvement of other European states. Furthermore, it promotes collective action in policy areas where transnational collaboration between WB countries is extremely rare. The concept of EG also appears highly applicable for assessing the GAWB process. Firstly, the overarching green agenda theme is still in its relative infancy, meaning there are high levels of uncertainty and a lack of knowledge on green agenda topics. This context represents a breeding ground for EG approaches based on multi-actor deliberation where participants can share knowledge and learn from each other's experiences in the preparation of new policy frameworks. Secondly, the GAWB process appears to follow the iterative cycle of the four key EG dimensions. The GAWB has an underlying EG logic based on the preparation of a broad overarching strategic narrative, complemented by measurable indicators used as a framework for implementation and monitoring. Furthermore, actors have provided reports on the implementation of the GAWB and a re-evaluation of the GAWB that is due to take place. On the surface, therefore, the GAWB, appears an example of experimentalist macro-regional governance. The empirical analysis below delves further into this initial hypothesis.

Research methods and data

The following assessment of the GAWB process as an exercise in EG is built on a mixed research method approach including qualitative desk-based analysis of core GAWB documents, such as the GAWB Action and Plan and GAWB Implementation Report. The documentary data is supplemented by semi-structured interviews and focus group interviews conducted with 19 stakeholders across the WBs conducted in 2024 (Interview, 2024). The selection of participants began with a stakeholder mapping, seeking for a diverse representation, and snowballing. Actors interviewed included those responsible for leading the GAWB process i.e., RCC representatives, and a variety of relevant actors involved in GAWB development and implementation processes

i.e., national and government representatives, NGOs, academia and international political organisations. Participants also included stakeholders who were considered important but were absent in GAWB participatory processes (interview references are outlined in Annex 1).

Researchers conducted the interviews together with local academic partners to aid the conversation by clarifying and contextualising place-based processes, terms, regulations, among other context specific developments. An interview guide was designed based on the EG concept and broader multi-level governance and stakeholder engagement literature. The interviews and focus group interviews were semi-structured to allow topics to emerge organically and allow participants to raise issues they consider most relevant. Additionally, focus groups let participants to establish a dialogue with each other, allowing researchers to also learn from the way they interact with each other. The interview results and data were triangulated and cross-compared to identify common and contrasting positions across the interviewees.

The empirical research presented several limitations. Attracting participation proved rather challenging, especially from the organisations that have the formal responsibility to carry out GAWB policy development processes. There is also a certain degree of stakeholder fatigue when it comes to lack of engagement and unclear expectations. Finally, a limitation for our analysis is the imbalance representation of participants from the WB countries.

Empirical Results: Experimentalist Governance and the Green Agenda for the Western Balkans

This section of the article examines the GAWB process against the four key dimensions of EG. The analysis also compares the GAWB with EU macroregional strategy processes, which are regarded as prime examples of EG in practice at the EU level.

Framework Goals and Indicators

EG processes are structured around the development of broad framework goals and measurement indicators established by public authorities in consultation with other public and private stakeholders (Sabel & Zeitlin, 2012). In line with EG approaches, the GAWB Action Plan provides a framework for developing and implementing climate and environmental policies across five interconnected pillars: (1) climate, energy and mobility, (2) circular economy, (3) depollution, (4) sustainable agriculture and food production, and (5) biodiversity (RCC, 2020). The main themes cover several sub-themes (outlined in Table 1). The Action Plan framework seeks to enable coordinated action for WB countries to adopt EU climate and environmental standards, while adapting them to local contexts. These efforts are motivated by access to EU funding and advancing the EU accession process (Berisha, 2025).

The GAWB Action Plan translates selected thematic area goals into a series of policy actions to guide implementation, including 58 actions that specify strategic objectives (RCC, 2021). The actions range from aligning with EU regulation and standards (e.g. Climate Law, Industrial Emissions Directive, water-related acquis, ETS), setting forward-looking targets and developing plans, strategies and new legislation, as well as various other initiatives and sector-specific measures. The list of actions is complemented by indicators to monitor progress and implementation (Ibid). In this regard, the GAWB Action Plan follows the same thematic structure and targeted action logic that guide EU macroregional strategies.

Table 1. Core themes and sub-themes of the GAWB

Main Theme	Sub Themes
Clean Energy and Climate Protection	Climate Change (e.g. climate laws/targets and building climate resilience)
	Clean Energy Transitions (e.g. renewable energies, energy efficiency in homes/buildings, industrial/business transition to clean energy processes)
	Smart and Sustainable Transport
Circular Economy	Recycling, Waste and Plastics
	Resources, production, and innovation
Depollution	Air
	Soil
	Water
Building Sustainable Agriculture and Food Systems	Sustainable Food Systems
	Developing Rural Areas
Protecting Biodiversity and Ecosystems	Protecting Habitats, ecosystems, and species (e.g. protected areas, forest restoration, lakes etc.)

Source: adapted from [RCC \(2021\)](#).

However, the GAWB Action Plan has faced significant criticism regarding the framework structure. The stakeholders interviewed describe the GAWB Action Plan goals and indicators as overly broad and difficult to measure (IS1; INM5; INM9; INM10). Many actions are listed at an abstract level and clear timelines or precise metrics for monitoring implementation are lacking (INM1; INM10). Most actions are briefly outlined (e.g. ‘Prioritise energy efficiency and improve it in all sectors’, ‘Development of Green Infrastructures and ecosystem connectivity’) with vague timelines covering ‘continuous improvement until 2030’ ([RCC, 2021](#)). In addition to abstract milestones, the priorities, roles, resources and responsibilities for implementation also remain vague (IS1; INM8; INM10). While the interviewees generally saw good opportunities for cooperation in GAWB activities, they criticised the lack of concrete, practical implementation steps in the Action Plan (INM1; INM7; INM8).

The Action Plan formulation processes has also been criticised as top-down and exclusive (IS3; INM1; INM3; INM4). Interviewees noted that it was ‘drafted in the dark’ (INM2) without a ‘genuine effort of creating dialogue’ (INM3), presented for approval without sufficient possibilities for meaningful consultation (INM9; INM10), and resulting in a ‘lack of ownership’ (INM1) and support among stakeholders (INM2; INM10). Particularly CSOs and local authorities highlighted limited involvement and opportunities to contribute to the agenda or action plan (INM3; INM8; INM9). They characterised the processes as lacking transparency and being difficult to follow due to limited availability of information (INM2; INM6; INM9; INM10). When stakeholders had been consulted, timelines had been unrealistically short, and organisations had been ‘cherry-picked to comment on a 200-page document in two weeks’ (INM9). A lack of competences, capabilities and knowledge among authorities and stakeholders was also mentioned as an additional barrier in the Action Plan formulation process (IS1; IBiH1; IBiH3; INM1; INM2; INM8; INM9). EU macroregional strategies have faced similar criticism as examples of EG processes that are too top down and exclude key regional and societal actors in the development of overarching framework and action plan formulation ([Gänzle, 2017](#)).

Local Units

EG approaches emphasise that ‘local units’, including state regulatory agencies and member state authorities, are given discretion to implement framework and action goals according to their own context and requirements (Sabel & Zeitlin, 2011). At the national level, government climate and environmental ministries have been granted autonomy and discretion to interpret and implement GAWB actions according to national needs and priorities. One interviewee noted that the GAWB allows for flexible implementation as ‘it provides nothing more than a structure and you have to assess what suits your country in terms of themes, targets and indicators’ (INM2). The GAWB Action Plan acknowledges a central role for national ministries highlighting that ‘the main responsibility for the implementation lies with the Western Balkan authorities following inter-sectorial and inter-institutional cooperation’ (RCC, 2021, p. 3). One interviewee confirmed this, pointing out there is a ‘high level of political control’ when it comes to GAWB implementation and financing, with national ministries assessing what is feasible to implement by comparing the GAWB with their own national climate and environmental action plans (INM1).

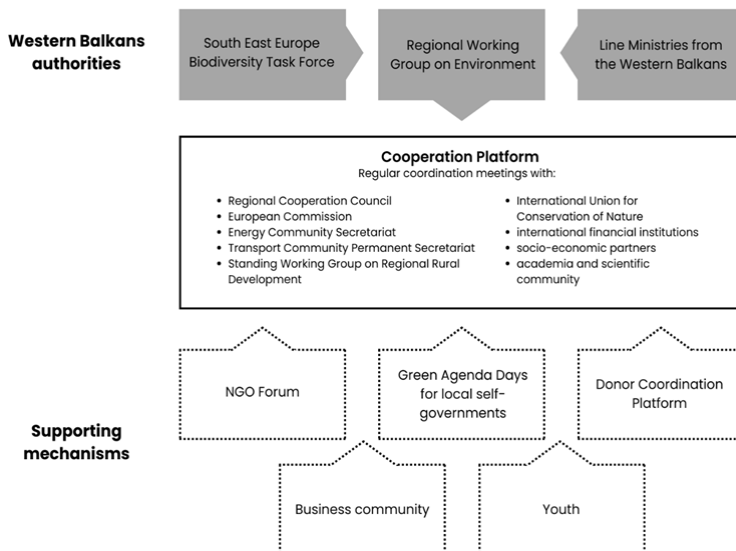


Figure 1. The GAWB Governance Model
Source: adapted from RCC (2021, p. 32).

The dominant role of national actors in the GAWB implementation was highlighted by another interviewee: ‘the GAWB is primarily implemented through large scale infrastructure projects driven by national level ministries with no real consultation of wider stakeholders’ (IBiH1). That national ministries have a central coordination role when it comes to GAWB implementation is not unsurprising given that the GAWB largely focuses on national level actions. The dominant role of national level actors does, however, contradict the multi-actor implementation governance structure outlined in the GAWB Action Plan. The Action Plan outlines a multi-level, multi-actor governance structure based on vertical coordination and strong cross-sectoral collaboration: ‘concerted action is necessary to ensure regional ownership and cooperation, a multi-stakeholder approach, a cross-sectoral collaboration through the involvement of all relevant Western Balkan

authorities, as well as strengthening cooperation at different levels' (RCC, 2021, p. 30). As outlined in Figure 1, this multi-actor approach involves relevant regional organisations that lead climate and environmental activities in the WB region (RCC, 2021).

To make this multi-actor approach possible, the RCC established fora to engage a diverse range of actors in dialogue and implementation, including the NGO Forum and the Green Agenda Days. These fora were designed to provide a platform for bottom-up consultation and establish a dialogue with local self-governments. In practice, the NGO Forum and Green Agenda Days have had a minimal role in implementation and wider public-private stakeholders, including universities, have also had a limited role in implementation processes (INM3; INM9; INM10). One interviewee pointed out that the RCC general secretary recognise that they have made mistakes in not sufficiently engaging regional and local actors in action plan implementation (INM3). Even within the core GAWB documents, there is very little mention of local governments beyond their participation in the Green Agenda Days. This contradicts the assertion in the Action Plan that the implementation of the GAWB is based on a bottom-up approach, involving 'a whole range of actors' (RCC, 2021). The limited role of sub-national level authorities and other public-private closely mirrors the implementation challenges associated with the EU macroregional strategies (Sielker, 2016) and EG processes in general (Fossum, 2012). The exclusion of local actors and CSOs has hindered the GAWB's implementation and integration into local contexts.

The GAWB Action Plan notes that smooth implementation requires appropriate expertise in all fields of sustainable development, environmental protection, climate change, and technical support (RCC, 2021). However, one interviewee noted that there are several barriers to effective GAWB implementation, including 1) low capacities and knowledge on certain climate and environmental topics; 2) limited technical skills to put knowledge into practice; and 3) existing procedural public procurement laws (IBiH1). The general lack of competences and resources in the RCC and national public administrations represent the main challenge for implementation. Another interviewee noted that national level procurement and regulation laws are very difficult to overcome unless there is a political will to change procedures and assist implementation, but there is no political will if they do not see the benefits of implementing the GAWB (IBiH1). Another implementation challenge relates to a lack of equipment and trained technicians, outdated technology, and obsolete infrastructures are common challenges across the areas covered in the GAWBs, from energy systems to transport, waste management and monitoring pollution (RCC, 2021).

Regular Reporting

The EG concept stipulates consistent and systematic reporting on policy framework goals and targets (Sabel & Zeitlin, 2010). Monitoring and reporting on the progress of the GAWB can be described as a rarity, rather than a regular activity. The 2023 GAWB Action Plan Implementation Report provides an assessment of the progress made in meeting the GAWB Action Plan targets and goals up until the end of 2022 (RCC, 2023). It is the first, and only, official annual report on the implementation of the GAWB. The report was coordinated by the RCC working in collaboration and consultation with other actors, including ministries across WB countries, the European Commission, and key Regional Coordinators, namely the Energy Community, Transport Community, International Union for Conservation of Nature, Standing Working Group on Regional Rural Development, and the GAWB NGO Forum. The report also received technical inputs from the OECD team working on Green Economy and Sustainability in Southeast Europe (RCC, 2023).

In the implementation reports, a total of 58 individual GAWB Actions are assessed across the seven core thematic areas. Each of the seven core themes is broken down into two sections of analysis. Section 1 outlines progress in implementing the GAWB Actions across the WB region, providing a country-by-country assessment indicating which WB states have currently met, or not achieved, individual GAWB Action points. Section 2 evaluates the baseline indicators outlined in the GAWB Action Plan to establish a benchmark for future progress monitoring. This section highlights gaps in data availability and quality, suggesting indicator-based amendments to enhance GAWB monitoring and reporting systems moving forward (RCC, 2023).

The 2023 GAWB Implementation Report is supplemented by several other reports published as part of the EU4GREEN project. EU4GREEN is a three-year project running between from 2022–2025, funded by the EU and Austrian Development Agency to support the implementation of the GAWB. To date, the EU4GREEN project has provided four assessment reports on topics related to the seven core themes of the GAWB, including pollution level detection, soil monitoring, green finance, and circular economy business models (EU4GREEN, 2025). While these reports do not specifically evaluate GAWB Actions and implementation processes, they highlight national developments under the respective themes. In addition to these reports, the EU4GREEN project is also credited as providing technical inputs that supported the development of the 2022 GAWB Action Plan Implementation Report (RCC, 2023).

The GAWB Action Plan Implementation Report highlights a process of policy framework monitoring and reporting in line with the EG concept. The regularity and consistency of reporting is open to question, however, as annual implementation reports for the proceeding years of 2023 and 2024 have not emerged. This is in sharp contrast to EU macroregional strategies which are evaluated in a comprehensive way every other year ‘to provide all institutions concerned with sufficient insights for an informed debate’ (EC, 2016, p. 3). It is beyond the scope of this paper to assess the extent to which GAWB monitoring and reporting enhances institutional and stakeholder learning. However, the 2023 Implementation Report, and supplemental EU4GREEN reports, do provide important new inputs and status updates on national level developments under GAWB themes. These insights provide valuable information and feedback that could enhance stakeholder learning and understanding, while also contributing towards GAWB re-evaluation and amendments.

Periodic Revision

EG processes highlight the need for review and revision procedures of overarching framework goals (Sabel & Zeitlin, 2011). A substantial revision of the GAWB overarching framework and Action Plan has yet to be conducted. The 2023 GAWB Action Plan Implementation report does not propose any revisions to priority actions but merely highlights existing actions that have yet to be achieved and should be prioritised moving forward. This does not amount to a full review process as existing framework goals and actions remain unrevised. This process contrasts with EU Macroregional Strategy Action Plans where priority action areas have been regularly revised; for example, the Macroregional Strategy for the Baltic Sea Region Action Plan has been revised in the years 2013, 2015, 2017, and 2021 respectively, building on lessons learned from previous macroregional activities and responding to newly emerging issues and opportunities in the Baltic Sea Region (Gänzle & Mirtl, 2019).

The RCC intends to conduct a GAWB evaluation and revision process; however, interviews revealed that there has been an ‘empty space over the last two years when it comes to high level discussions on the GAWB due to political obstacles’ (IBIH2). Furthermore, it was noted that there is only one person at the RCC responsible for GAWB processes, so they are lacking the capaci-

ties to conduct a full and effective review and amendment of the GAWB framework and Action Plan (IBiH2). Evaluation and revision processes, based on open deliberative stakeholder dialogue, are an integral part of the EG logic, as learning can lead to transformative policy change (Sabel & Zeitlin, 2011). As things currently stand, GAWB dialogue has stalled, which limits the potential for meaningful revision processes that can promote learning and take the GAWB in new directions.

The GAWB and experimentalist governance logic

The empirical assessment indicates that an EG logic is driving GAWB processes. The GAWB development and implementation process closely follows the structure and logic of the EG concept. Firstly, the GAWB is structured around an overarching framework consisting of strategic thematic areas with corresponding actions and indicators. Secondly, national level actors have been granted autonomy and discretion to implement these non-binding measures how they see fit within the context of national priorities and existing legal, regulatory, and policy structures. Thirdly, a process of reporting on the progress of the implementation of the GAWB action plan has occurred, but reporting has largely been irregular and inconsistent. Fourthly, the RCC is in the process of organising a review and revision process to amend the GAWB framework and action plan, although this has yet to take place. All four dimensions of EG are present to varying degrees within the GAWB process.

Furthermore, the GAWB process replicates ‘the three no’s’ structure central to EU macroregional strategy building, which are closely associated with EG approaches. The GAWB has not led to the development of any new transitional organisational structures as it is formulated and managed through the existing structures of the RCC. The GAWB has received no new designated funding, with implementation financed through existing EU and national level funding resources, including the Instrument for Pre-Accession (IPAI), the Western Balkans Investment Framework, and the European Fund for Sustainable Development Plus (EFSD+). The GAWB also gave rise to no specific or binding EU legislation for the WB Region, which is consistent with the largely non-binding nature of the EU Green Deal that the GAWB is designed to replicate and support. These findings indicate that the GAWB is being driven by an EU macroregional logic to promote coherence between WB countries in climate and environmental policies.

The GAWB has faced similar criticism to the development and implementation procedures associated with EU macroregional strategy building. Both are regarded as top-down intergovernmental processes dominated by national level actors with a limited and curtailed role for the sub-national level and other key stakeholders, including SMEs, NGOs, and societal groups (Sielker, 2016). The GAWB has also been specifically criticised for being heavily influenced by large industrial sectors across WB states. This finding is consistent with recent criticism of EU Territorial Just Transition Plans development processes across EU regions, which have been dominated by national level actors and large industrial sectors, thereby prioritising the technical and economic dimensions of transitions over societal impacts and citizen needs (Moodie et al., 2021). That national level actors and industrial sectors are the dominant players in the GAWB process is not entirely unsurprising; firstly, the preparation of the GAWB overarching framework and action plan was dominated by national level ministries with little involvement of regional and local stakeholder groups. Secondly, because of the dominant role of national ministries, most of the GAWB individual actions focus on the national level and require national level coordination. Thirdly, WB countries have centralised governance systems with limited roles and responsibilities for sub-national level actors.

Fourthly, industrial sectors are essential actors in achieving GAWB actions and, therefore, require a central role in policy discussion and implementation. These findings challenge the view that EG processes are non-hierarchical and ignore traditional principal-agent structures (Sabel & Zeitlin, 2011). This suggests that the role of power asymmetries in EG structures needs to be reconsidered.

Such narrow stakeholder involvement in GAWB development and implementation challenges the narrative that EG approaches are driven by direct deliberative polyarchy mechanisms (Sabel & Zeitlin, 2010). The preparation of the GAWB Framework and Action Plan was not based on deliberation and reciprocal persuasion between multiple actors with competing interests. This supports the critique that processes based on an EG logic can often be technocratic and dominated by policymakers, and administrative and technical experts (Börzel, 2012; Fossum, 2012). For EG structures to work effectively, there must be careful checks and balances on participatory openness and inclusiveness to ensure that different voices and perspectives are heard.

Transformative policy change based on recursive learning processes is considered a core element of the EG concept (Sabel & Zeitlin, 2011). Institutional and stakeholder learning as part of the GAWB process is difficult to measure. Learning has been restricted due to irregular reporting on the GAWB Action Plan implementation and the small number of GAWB theme evaluations provided by the EU4GREEN project (RCC, 2023; EU4GREEN, 2025). While these documents provide important learning information and insights into national level GAWB implementation efforts, it is not possible to evaluate the impact of this learning on GAWB policy change as an evaluation and revision process is yet to take place. This indicates that the standard and consistency of reporting have serious impacts on the quality of learning and policy revision processes central to the EG concept. The potential for transformative policy change through learning is perhaps overstated in the EG literature and is out of synch with the step-by-step logic of the approach. The gradual and piecemeal nature of EG is more likely to affect incremental policy change than contribute towards transformative and novel policy developments.

The future of experimentalist macroregional governance in the WBs

The EG logic at the heart of the GAWB process lays the foundation for enhanced macroregional governance cooperation under climate and environmental policy themes central to the GAWB and EU Green Deal. However, the main weaknesses associated with the EG concept are evident in GAWB formulation and implementation practices. These challenges, related to vague framework goals, power asymmetries, and weak monitoring and evaluation processes, can be improved through the following steps:

- Firstly, the RCC must work together with a broader range of expert stakeholders to develop less vague and more targeted framework goals, with clearer implementation actions and measurable indicators. The RCC can work closely together with national statistic offices and climate and environmental academic experts to develop measurable targets and qualitative and quantitative assessment indicators for each GAWB Action Plan theme. GAWB Action Plan goals and targets should be based on the latest evidence-based climate and environmental research (e.g. environmental and climate impact assessments, regulatory impact assessments, socio-economic impact assessments).

- Secondly, the RCC needs to broaden stakeholder involvement in GAWB development, implementation, evaluation and revision processes, to ensure that national governments and large industrial sectors do not dominate the proceedings. The proactive engagement of underrepresented groups is crucial, including sub-national level authorities, SMEs, NGOs, and societal groups. The existing NGO Forum could be afforded a more prominent role in future discussions to ensure that societal impacts and citizen needs are better represented in GAWB discussions. An increased role for sub-national level actors is also essential for effective implementation and to ensure that policies are tailored to address different regional socio-economic and environmental requirements. This requires the RCC to develop a more detailed GAWB governance and stakeholder involvement plan, outlining the role and responsibilities of different actors at different stages of the GAWB process.
- Thirdly, the RCC must ensure the regular enactment of annual GAWB Action Plan implementation reporting and periodic Action Plan revision processes (e.g. once every two years). Action Plan reporting and revision are essential to ensure that GAWB goals keep pace with new climate and environmental policy developments and to promote learning. The RCC can work together with NALAS and local level NGOs and CSOs to increase the transparency and visibility of GAWB aims and objectives for citizens. Social media tools can be used to enhance citizen awareness and knowledge of the GAWB. The RCC could also build an online platform to showcase GAWB results and achievements to help raise citizen GAWB awareness and disseminate good climate and environmental policies and practices to promote stakeholder learning.

Furthermore, the current national level focus of GAWB actions has the potential to promote increased policy coherence across WB countries but does not contribute towards genuine transnational policy collaboration between WB countries. One interviewee noted that many GAWB policy action areas do not naturally equate with collaborative transnational governance, like decarbonisation and depollution (INM2). Moreover, under these themes it is better to focus on national level policies, as improvements at national level will promote policy cohesion and benefit the WB Region as a whole (INM2). However, other interviewees noted that there is the potential for macroregional collaboration under certain other GAWB themes, such as circular economy, and biodiversity and nature protection; here there is the possibility for collaboration, particularly in cross-border regions where industries and business can share resources and knowledge in the development and implementation of policies (IBiH1; IBiH4). The creation of cross-border green innovation ecosystems was also pointed towards as a future policy area for genuine macroregional collaboration under the green agenda theme (IBiH5).

The experience of the GAWB lays the groundwork for the development of an official EU macroregional strategy for the WB Region. RCC representatives interviewed indicated that the European Commission are interested in the idea of EU macroregional strategy for the WBs but are not sure where to begin with this process as there is little political support for transnational activities without funding and that only promote knowledge sharing projects (IBiH3). Another interviewee noted that the key question for WB Balkan countries is whether they want to be part of an EU macro-region for the WBs or a broader geographical unit along the lines of the original South-East European Cooperation Process (IS3). There are also a range of existing transnational structures available for cross-border cooperation activities including the RCC, the EU macroregional strategies for the Adriatic-Ionian and Danube Regions, and Interreg programmes (IS1). Indeed, WB countries would need to seriously assess the costs and benefits of remaining in existing transnational collaboration structures or developing a new EU macroregional strategy for the WBs. Given the overall lack of political support, limited impact, and multiple challenges associated with EU macrore-

gional strategies, the former option might be better than the latter. One interviewee suggested that the search for narrow cross-border functional areas between WB countries might be a more fruitful alternative to grander macro-regional strategy plans (IS2). Consequently, there are several options available to the WBs when it comes to promoting transnational cooperation, leaving different possibilities for collaborative action depending on the policy area in question.

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Annex 1. Overview of interviewees

Interview Reference Code ¹	I/FG ²	Organisation	Sector	Location
IS1	FG	Agency for Spatial Planning	National government	Belgrade, Serbia
IS2	FG	Ministry of European Integration	National government	Belgrade, Serbia
IS3	FG	United Nations Environment Programme (UNEP)	Political international organisation	Belgrade, Serbia
IBiH1	I	CETEUR	Business	Sarajevo, BiH
IBiH2	FG	Regional Cooperation Council	Political International Organisation	Online
IBiH3	FG	Regional Cooperation Council	Political International Organisation	Online
IBiH4	FG	Regional Cooperation Council	Political International Organisation	Online
IBiH5	FG	Regional Cooperation Council	Political International Organisation	Online
INM1	I	Ministry of Environment & Physical Planning	National government	Skopje, RNM
INM2	I	Delegation of the European Union	EU government	Skopje, RNM
INM3	FG	Network of Associations of Local Authorities of South East Europe (NALAS)	Local government / Political International Organisation	Skopje, RNM
INM4	FG	Network of Associations of Local Authorities of South East Europe (NALAS)	Local government / Political International Organisation	Skopje, RNM
INM5	FG	Network of Associations of Local Authorities of South East Europe (NALAS)	Local government / Political International Organisation	Skopje, RNM
INM6	FG	Network of Associations of Local Authorities of South East Europe (NALAS)	Local government / Political International Organisation	Skopje, RNM
INM7	FG	Iustinianus Primus Scholl of Law, University Sts Kiril i Metodij & former National coordinator of Berlin Process	Academia	Skopje, RNM
INM8	FG	European Policy Institute – EPI	NGO	Skopje, RNM
INM9	FG	Ekosvest	NGO	Skopje, RNM
INM10	FG	Central and East European (CEE) Bankwatch	NGO	Skopje, RNM
IA1	I	Former Director of Co-PLAN	Academia	Tirana, Albania

¹ Interviewee Serbia (IS); Interviewee Bosnia and Herzegovina (IBiH); Interviewee Republic of North Macedonia (INM); Interviewee Albania (IA).

² Interview (I) or focus-group interview (FG).