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THE ESTABLISHMENT OF THE NATIONAL COUNCIL FOR CIVIL SOCIETY: *A CHALLENGE OR ACHIEVEMENT?*

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GENERAL OVERVIEW

Civil society organizations (CSOs)¹ play an important role in strengthening democratic processes and consolidation of good governance and transparency, therefore their contribution should be channeled through the establishment of institutional mechanisms for cooperation with the public institutions. In Albania, over the last 20 years, CSOs have undergone a considerable transformation, although [their maturation process has not yet been accomplished](#). However, beyond the challenges encountered so far, [these actors should be seen as an essential component for the democratization of the country and should be treated as such by public administration institutions](#). Over time, governments have been increasingly interested in involving CSOs in the policy-making processes, and in this perspective, it has been invested in setting up institutional cooperation mechanisms.

In 2015 the Albanian Parliament adopted the [law no. 119 on the establishment and functioning of the National Council for Civil](#)

[Society](#) (NCCS), in order to enable a mechanism of cross-sectoral dialogue between the government and the CSOs. The genesis of drafting this law and the concretization of cooperation between the parties in an advisory and autonomous structure dates back to the adoption of the [Road map for the government policy towards more enabling environment for civil society development, 2013-2017](#). Moreover, the Albanian government officially pledged the European Union on the establishment of this consultative mechanism during the [first High Level Dialogue meeting](#), whose joint conclusions stated that this council would enable civil society involvement in the reform processes, and would create a framework for channeling the expertise of this sector into the policy-making processes.

The [National Council for Civil Society](#) consists of 27 members, out of which 13 are representatives of civil society organizations, selected through an online process managed by the Agency for Support to Civil Society (ASCS). The Council's overall objective is to establish a continuous dialogue for an enabled framework for the civil society sector, and their participation in policy-making processes, based on three principles, namely advising, transparency and consultation with the interested

¹ In this brief it is used the definition of the law 119/2015 for the concept of CSO: "civil society organizations, which may be non-profit organizations or other civil society entities, that are not registered as NGOs, but that perform activities for the benefit and public interest".

stakeholders. The selection process of the members from the civil society lasted in total 6 months (December 2015 - June 2016), while the effective constitution of NCCS dates on December 2017. The establishment process of the council has triggered debates between civil society organizations (non-member of NCCS) on the shortcomings with regards to respecting the principles of transparency and inclusiveness in the setting up of this mechanism.

This brief aims to contribute to the documenting of the establishment process of NCCS, in order to enhance advocacy on the constructive engagement of civil society in policy- and decision-making processes. The brief aims at increasing transparency on the work done by the council until June 2018. It will focus on the challenges encountered during the process of establishment – both in the perspective of legal framework in force and in the perspective of the capacities needed for the well-functioning of this cross-sectoral mechanism. Following a brief overview of similar experiences in Croatia and Montenegro, the analysis will be concluded with some specific recommendations aimed at improving the role and contribution of the NCCS.

Regarding the methodological aspect, the brief has a qualitative nature. The primary sources consist in content analysis of the minutes of meetings (i.e. meetings of the council and meetings organized with the members representing the CSOs), interviews with representatives of civil society organizations – members and non-members of NCCS – and with the council's technical secretariat. Whereas the used secondary sources refer to reports published by international bodies (European Commission and Freedom House), ASCS' publications (18 articles published in the periodic newsletters), as well as online media coverage. There have been consulted as well the posts published on the social media account of the Agency for Support to Civil

Society (in total 41 posts and 2 events created on Facebook), considered as a valuable source of information in the form of electronic diary describing the steps taken in the period between 2015-2018 for establishment and functioning of the NCCS.

SHORTCOMINGS OF THE LEGAL FRAMEWORK

The National Council for Civil Society is a collegial, advisory and autonomous body established near the Council of Ministers. It aims to strengthen systematic cross-sectoral cooperation between the civil society organizations and public institutions, as part of a comprehensive national policy dialogue, as well as in the framework of the country's democratization processes.

Based on article 8 of the law 119/2015, NCCS has three major objectives, namely: (i) to advise and issue recommendations to the government on public policies that impact on the development of civil society and its involvement in cross-sectoral cooperation; (ii) to advise the government on legislative improvements that promote the development of civil society and its involvement in the decision-making processes; and, (iii) to issue opinions to the government and ASCS on priorities' planning related to the distribution of public funds, EU funds and other international donors that focus on the development of civil society.

The council is composed of 27 members, out of which 13 are representatives of public institutions, 13 are representatives of the civil society organizations and 1 represents the business community, namely the National Economic Council. The law stipulates that the chairman of NCCS is the Minister of Social Welfare and Youth, meanwhile with the changes of the structure of the Council of Ministers as of September 2017, this position is currently covered by the Minister of Health and Social Protection. The deputy chairman is elected among the members of the CSOs sitting in the council.

ASCS serves as technical secretariat of the National Council for Civil Society, enabling the exercise of subsidiary and administrative functions. This public agency covers with its budget the expenditures incurred in the framework of activities undertaken to fulfill the functions of the council; whereas the contribution of the NCCS members is on a voluntary basis.

The law stipulates that the council should meet at least three times per year, and whenever a meeting is required by at least 9 members. The meetings are organized at the premises of the Prime Minister's Office and to be valid more than half of the members should attend it. NCCS reports annually to the Council of Ministers on the activities and this report is published on its website for public consultation. It operates according to the [rules of procedure](#), which were approved during the [meeting of 26/12/2017](#). The rules of procedure sanction the organization of the process of advising, consultation and transparency, the conduct of the meetings, and the drafting of the annual report.

Regarding the implementation of the law on the establishment and functioning of the NCCS, its current version has some shortcomings or inaccuracies, which need to be reviewed at the earliest possible time by the relevant actors. The first concern regards the **duration of the mandate of the members** of NCCS, which varies according to the position that they cover, namely:

(i) the mandate of the **members representing the public institutions** coincides with the exercise of their duty in the institution they represent (Article 6 of the law). The law clearly defines which ministries are part of this council and the level of participation should be at the rank of deputy ministers or other senior management positions;

(ii) the **members representing the CSOs** have a three years' mandate, with the right to re-election once (except for the first members who will have a one, two and three-year mandate, according to the lot organized by ASCS in line with the transitional provisions) (Articles 9 and 16 of the law);

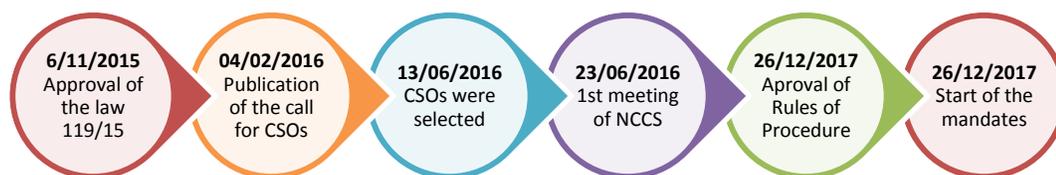
(iii) whereas the **member from the National Economic Council** has an **unclear mandate**. While article 6/2 of the law specifies that "*the mandate of [...] the representative of the National Economic Council at NCCS is related to the [duration of] the mandate, during which [he] exercises the respective public duty, because of which he is appointed also member of the NCCS*", Article 9/1 states that "*the duration of the mandate of the members of the NCCS, representing the CSOs, [...] is three years, with the right to be re-elected once, including the representative of the National Economic Council*". At this point arises naturally the question on whether the representative of the business community owns a mandate associated with the duty he exercises at the National Economic Council or is he obliged to respect the clause of a three years' mandate, renewable once (thus 3 years plus 3 years)?

Secondly, there is a **discrepancy over the exact number of members** from the CSOs. In Article 6/6 of the Law 119/2015 specifies that "*NGOs elect as their member in the NCCS **four representatives of civil society per each of the following sectors:** a) democratization, rule of law, human rights and integration into the EU; b) economic, territorial and environmental development; c) welfare, social services, health protection and improvement of the quality of life*". The '**formula 4-4-4**' sanctioned by law is inaccurate because the total number of the members from CSOs is

13. This discrepancy results also present in Article 5 of the rules of procedure of NCCS.

Finally, the Achille’s heel of this cooperation mechanism stands at the issue of ownership over the NCCS and responds to the question: “*Who speaks on behalf of the council? The Minister or the 13 members from the CSOs?*”. The current legal framework creates dependency prospects of the Council on the domestic political developments and undermines its autonomy as a cross-cutting structure: Firstly, the National Council for Civil Society is chaired by a minister with a political mandate whose replacement in May 2017 with a technical minister, Mrs. Xhuljeta Kërtusha, suspended the functioning of the NCCS’ work in practice because no meeting was called for (from May to September 2017). The same thing happened later with the dissolution of the Ministry of Social Welfare and Youth within the structure of the Council of Ministers, which led to uncertainty on the ministry that would follow the chairmanship of this council. Meanwhile, the presence of CSOs in the council should serve as a constructive element in ensuring the continuity of work regardless of the political developments of the moment, as long as the ultimate goal is public welfare. Secondly, Article 19/5 of the rules of procedure states that “*in case of equal votes, the vote of the Chairman is the one prevailing for effects of decision-making*”. This article sanctions the dominance and inequality between the members in all cases where the position of representatives of public institutions is diametrically opposed to that of CSOs’ representatives.

Figure 1: Main steps for the establishment of NCCS



Source: Author’s own elaboration.

THE PROCESS OF ESTABLISHMENT AND FUNCTIONING OF NCCS

[The involvement of the civil society organizations in the policy-making processes in Albania is not yet at the desired level and there is still room for improvement.](#) The organizations themselves face different issues, ranging from the registration procedures at the responsible institutions up to the VAT reimbursement law. The very fact that there is still no unified register of civil society organizations, or an exact number of organizations currently active in Albania, is an important aspect to be taken into consideration because it has a direct impact on the selection process of the members representing the CSOs in a mechanism such as the National Council for Civil Society.

Focusing firstly on the steps followed for the establishment of the NCCS, as shown in Figure 1, from the adoption of the Law 119/2015 to the official start of the mandates of the members of the council there has passed almost three years. [The process on the selection of the members representing the CSOs was not well-defined in Law 119/2015.](#) The transitional provisions provided for a relatively rapid process, where within 20 days from the entry into force of the law detailed rules for the selection process should have been defined, and the selection procedures should be carried out no later than 45 days. The drafters of the law seem to have disregarded the operational difficulties in the CSOs’ sector - which still needs a more structured arrangement – as well as technical and human capacities.

According to the law in force, the selection process of the first representatives from the CSOs in the NCCS should be done through a public and transparent procedure, which is organized by the CSOs themselves, following the criteria and procedures that they agree to apply. Meanwhile, ASCS should play a facilitating role in this process, providing for technical assistance in the organization of the procedures and publication of the results.

The selection process started with the initiation of the consultation period with the civil society organizations on 28/12/2015 and officially ended with the announcement of results on 13/06/2018. The consultation period aimed at informing the organizations by the ASCS on the establishment of this new cooperation structure with state institutions and the setting of the selection criteria of the candidates representing the civil society. Overall, this process was implemented by ASCS and not by the organizations themselves, as foreseen by the law.

Referring to table 1, the process of selection of the members from the CSOs has faced a number of internal and external challenges, which have resulted in the repeated postponement of foreseen deadlines and delays in the setting up the council. The internal challenges are related to the ASCS' capacity to undertake an information and selection process based on electronic voting instruments of the members representing the CSOs. While in principle the electronic voting would ensure a high transparency and real time accuracy on the final results, due to the challenges deriving from the lack of a unified electronic identification registry of the active civil society organizations in Albania, the final result of all this voting process has been even more difficult to achieve.

The difficulties faced by the [online voting process have generated a considerable number of invalid votes](#). In order to express

their voting preference online, the organizations were asked to identify themselves with some personal information such as the registration code (NIPT), the name of the executive director, and so on. This information was easily accessible on the internet - the Albanian Parliament has published a list containing this information on [its website](#) - and so it was created the opportunity for manipulations from the CSOs themselves. In front of these complications, ASCS asked for international technical assistance in order to find possible alternatives so as to successfully conclude this prolonged process.

For illustration purposes, let us focus only at the phase of online voting, which lasted from 31 March to 7 April 2016. During this timeframe there were in total 1141 online votes, although the preliminary verifications carried out by the ASCS showed that it was not effectively expressed the will of the same number of organizations. The conducted interviews for the purposes of this brief showed that, in front of the factual situation of achieving a considerable number of votes in a short timespan (during a night time) for the same candidate, ASCS decided to apply some filters, such as the control of the votes expressed from the same IP, data obtained from the General Directorate of Taxation on CSOs with an active status, etc. Considered from an *a posteriori* perspective and recognizing that the risk of voting manipulation is closely linked to human beings and personal ambition, - where any profession cannot be immune of - the voting verification process should have been predicted since at the outset of the process of selecting the members, and the mechanisms that were to be used should have been publicly stated. This approach would have discouraged potential misconducts by NGOs or candidates. Also, the use of preventive measures could have been accompanied by some awareness raising among the candidates on the

prospect of their exclusion from the elections in case of the verification of the misconduct.

On the other hand, some issues could have been addressed somehow more straightforwardly by ASCS. For instance, the timeslot available for any contestation by the disqualified candidates was not in accordance with the basic principle of three

working days. Table 1 shows that the deadlines have coincided in two cases with official holiday days (Saturday - Sunday). These inaccuracies of calculation are linked to the available human resources of the technical secretariat and in potential cases may lead to the prolongation of the process due to subsequent complaints from the disqualified candidates.

Table 1: Declared and effective timeline of the selection of CSOs' candidates in NCCS

TIMELINE OF THE ACTION PLAN							
	Publication date	Nomination period	Establishment of the ad hoc evaluation commission	Publication of qualified candidates' list	Contestation period (3 days)	Online voting (8 days)	Announcement of the selected members
Consultation meeting in presence of the Minister of Social Welfare and Youth, Mr. Blendi Klosi	04/02/2016	5-12/02/2016	5/02/2016	13/02/2016	14 - 16/02/2016 (Sunday - Tuesday)	16 - 24/2/2016	25/02/2016
Notification of postponement of the nomination process of candidates from CSOs	11/02/2016	"The process of selection of the candidates representing the civil society will continue to be open."					
Notification on the evaluation criteria and respective documentation presented by the candidates	29/02/2016	Until 21/03/2016, at 17:00					
Notification on the deadlines of the process of selection of the members from the civil society	19/03/2016	Until 25/03/2016, at 14:00		28/03/2016	29 - 31/03/2016 (Tuesday - Thursday)	31/03/2016 - 7/04/2016	8/04/2016
Notification on the evaluation of the candidates from the CSOs	19/04/2016	"The application phase for the candidates is closed and the candidacy evaluation continues."					
Notification on the conclusion of the evaluation of the candidates from the CSOs	22/04/2016	The list of qualified and excluded candidates is announced.			23 - 25/04/2016 , at 16:00 (Saturday - Monday)		
Notification on the opening of the online voting	26/04/2016					26/04/2016, at 13:00 - 4/05/2016, at 23:59	
Notification on the process of verification of the votes	20/05/2016	"We are in the process of evaluating the votes. The selected members will be notified by e-mail in the respective addresses."					
Notification on the announcement of the nominative list of the selected members	14/06/2016						13/06/2016

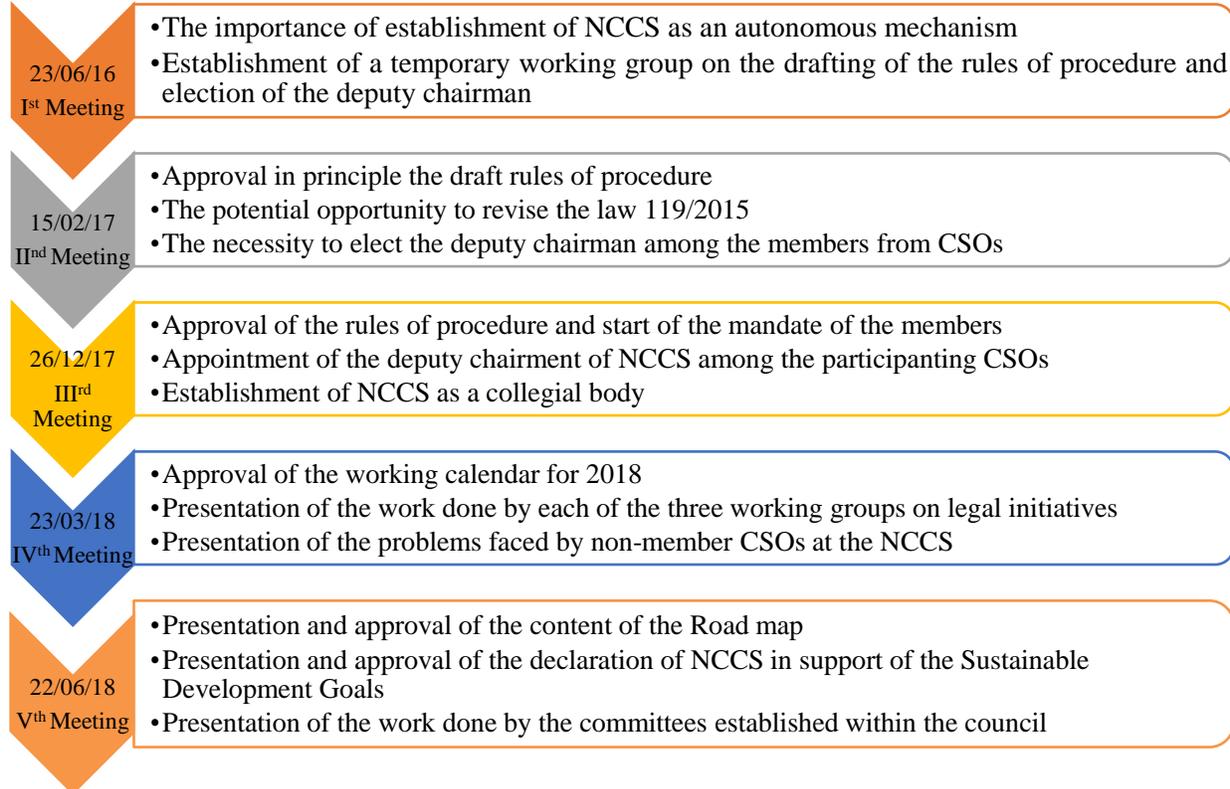
Source: Author's own elaboration.

Note: The table reflects all the deadlines set by ASCS for the selection of the candidates from the civil society. The first line reflects the declared dates at the beginning of the selection process (on 4/02/2016), and the following lines show the revised dates for each step of the process. Scheduled to be announced on 25/02/2016, the list of the elected members from the civil society was published only on 13/06/2016.

Another concern on the functioning of the NCCS relates to the prolonged process of approval of the rules of procedure and allocation of the mandates to the selected members from the civil society. Article 5/4 of Law 119/2015 states that the rules of procedure must be adopted at the first meeting of the council by a majority vote of the members. As noted in figure 2, the rules of procedure were part of three consecutive meetings of the NCCS: the draft rules were voted twice and the final agreement between the members was reached only at

the third meeting on 26/12/2017, which added further to the delay on the establishment of the council. The issue of missing rules of procedure has been raised several times by members representing the CSOs, even in meetings with third parties, [such as the one with representatives from the Prime Minister's Office or EU Delegation](#), despite the fact that the current legal framework provides no alternative or precautionary measure to solve this deadlock.

Figure 2: Main points discussed during the meetings of NCCS²



Source: Author's own elaboration.

² The main points of the first meeting of NCCS on 23/06/2016 have been drafted on the basis of the published summary of the meeting. The minutes of this meeting are not available online.

In the meantime, in principle the mandates of the members representing the CSOs are personal rather than the organization's that has supported the running of this member. These members have been supported during the selection process by NGOs and exercise the mandate at the NCCS for as long as no conditions of incompatibility or conflict of interest arise. To date, two members representing the CSOs have been replaced in the NCCS; they have voluntarily left. In one case there is a record in the minutes of the member's resignation and respective replacement,³ while in another case there is not any available written documentation on the website of the council. Their substitution was made with the first two highly ranked candidates standing in the waiting list published on 13/06/2016.

In front of the specific request raised by members representing the CSOs at the meeting of the NCCS on the need to proceed with the partition of the mandates, the given response is that "[the process is very clear\[ly described\] in the article at the end of the law](#)". Meanwhile, the transitional provisions state that: "*following the announcement of the successful candidates, ACSC organizes a lot to define the duration of the mandate of each member of the NCCS*", therefore the technical secretariat should have organized the lot on the partition of the mandates in the following weeks after the date of announcement of the successful candidates. The analysis of the minutes of the meetings of NCCS and the official communication with the technical secretariat shows that the mandate of the members started on 26/12/2017.

On the basis of article 22/2 of the rules of procedure, ASCS, in the role of the technical secretariat of the council, should develop the selection procedures of four new members (to whom expires the mandate of

one year) during the timeframe September-October 2018, and who should attend the first annual meeting of NCCS in 2019. The organization of the elections every year requires specific capacities and engagement of the ASCS.

In compliance with the principle of transparency and inclusiveness in the activities of the council, the rules of procedure stipulate in the articles 7 and 8 that ASCS should establish an online platform for information exchange and consultation of the NCCS with the civil society. Currently it is functional a website of NCCS - accessible through the website of ASCS - where are available for public consultation the minutes of the meetings of the council and of the working groups of the members from civil society. The website cannot yet be considered as an interactive platform where concerns can be expressed by different NGOs and an investment is required for the establishment of a server for the storage of the published data. Saving the materials on google drive does not help in raising the proper image of NCCS.

Another important issue remains the relationship between the members representing the CSOs and their cooperation with the colleagues representing the public institutions. Currently, NCCS has not accomplished any of the main tasks defined by law, in terms of issuing opinions, advices or recommendations. It has only adopted a [Declaration on the Sustainable Development Goals](#) in the frame of the 2030 United Nations Agenda during the meeting of June 2018. On the one hand, this is related to the fragmentation that exists between the members representing the CSOs, which was also noted in the [lack of a common understanding](#)⁴ and [prolongation of the](#)

³ Mrs. Migena Shulla resigns and her place is offered to Mrs. Aferdita Seiti.

⁴ The representatives of CSOs faced difficulties in finding an agreement on setting the criteria that should have been met by candidates for the position of deputy chairman of the NCCS. The discussions started during the meeting of March 2017 and the

[selection process of the NCCS deputy chairman the organizations, which ended only in December 2017](#). On the other hand, the representatives of the public institutions hold senior positions and due to the many political commitments they have in their working portfolio, often these representatives are replaced at the meetings with lower level officials who do not have decision-making powers.

The current legal framework regulates only the presence of members representing the CSOs at council meetings, while it does not address the presence of the members from the public institutions. In case of absence in at least three meeting of NCCS held during a year, the member from the CSOs loses the mandate. In the meantime, regarding the meetings of working groups of members from the CSOs, the presence is neither regulated nor mandatory. From the analysis of the minutes of *10 meetings* of these working groups, during the timeframe 7/9/2017-12/4/2018, it has been observed that 5 members out of 13 have a low attendance at these meetings (≤ 4 meetings). Their presence or absence is closely related to the timely notification from the technical secretariat to the organization on the organization of meeting (considering that not all members live in Tirana), the personal agendas of non-profit organizations, but also to the motivation and ownership on this council by the members themselves.

Starting from the beginning of 2018, NCCS is expected to respect the legal obligations on holding at least three annual meetings, drafting an annual report on the performed activities, and increasing transparency during the selection process of new members in fall. For their part, the members from the CSOs are expected to be more proactive in their engagement in the

NCCS, considering that the request of only 9 members is necessary for convening a meeting of the council on issues of specific interest to the sector.

EXPERIENCES FROM THE REGION

After the collapse of the communist regime, many Central and Eastern European countries proceeded with the establishment of national councils for cooperation between the government and civil society. Croatia, which set up such a council in 2009, as well as Montenegro in 2010 proceeded on this line as well. The Croatian model was considered a fruitful mechanism and was consequently adapted as a model for the establishment of NCCS in Albania.

Known as the *Council for Civil Society Development*, the [Croatian model consists of 37 members](#), out of whom 17 represent the state administration, 14 members represent non-governmental non-profit organizations, 3 representatives are from foundations, trade unions and employers' associations, and 3 representatives from the national and local government associations. The council is chaired by the president, who is elected among the representatives of the civil society, whereas the deputy president is from the members from the state institutions. The mandate of the members, the president and the deputy president lasts three years with the right of re-election. [Its role is to provide advice to the government on the development of CSOs' policies and strategies, as well as to continuously monitor the developments in this regard](#). Regarding [the complications encountered by the Croatian Council for Civil Society Development](#), we would mention: (i) difficulties in decision-making due to the selection of non-senior representatives from the public administration; (ii) members representing the CSOs do not have a functional link with the grassroots organizations that they represent; and, (iii)

process of selection the deputy chairman was closed after nine months.

lack of council's efficiency due to the high number of members.

Whereas the [Council for Cooperation with NGOs in Montenegro](#) has an equal composition of the members, in total 24, where 12 members represent the government and 12 are selected from the civil society organizations through a public call. The Chairman of the Council is one of the representatives of the government, while the deputy chairman is elected on the basis of proposals received by the council. All the members of the council are appointed by the Council of Ministers for a term of 3 years. The main focus of this council is monitoring the implementation of the strategy and action plan for government cooperation with NGOs, inclusion of civil society in the drafting and implementing public policies, as well as issuing opinions on the development of this sector.

In both of the above mentioned cases, the technical secretariat of the council has been appointed a public institution dedicated to the cooperation with NGOs, the counterpart of ASCS in Albania. In the case of the Croatian model, the members do not receive any compensation for their contribution, whereas [in the Montenegrin model the members receive a financial compensation](#).

CONCLUSIONS AND RECOMMENDATIONS

The National Council for Civil Society is still a new mechanism, although its establishment dates back to 2016. This cross-sectoral cooperation institution needs greater support in technical terms and on transparency, information and inclusion of civil society organizations. In this regard, some recommendations on strengthening NCCS are the following:

1. It is firstly necessary to review the legal framework and strengthen the institutional capacities, so as to enable the continuity of work and autonomy of

the council from the other institutions of the public administration. In addition to the main issues mentioned in the relevant section, there is a need also for a harmonization between articles 8 and 20 of the Rules of Procedure on the publication and distribution of NCCS' decisions. The decisions should be accessible online and no bureaucratic procedures should be added to any interested party upon submission of written requests to the technical secretariat to obtain a copy of the council's decision.

2. It is needed a serious investment in designing the interactive platform of the NCCS and filling it with information, such as: (i) the publication of the selection criteria of for the members; (ii) a list of selected members and potential members that are currently on the waiting list - for potential substitution cases that may arise; (iii) the publications of news and agenda of the meetings of the council and working groups; (iv) the building of a specific server for the data storage; (v) monitoring of the interaction that third parties have on the council's website; etc. This public information would enhance the transparency of the work of the council.
3. ASCS must invest in the unification of the procedure and format of the drafting of the minutes of the council meetings as well as those of working groups' meetings. Unlike the minutes of NCCS' meetings, the minutes of the working groups' meetings are currently relatively short and proportionally dominated by the coverage of the statements/positions of representatives of ASCS vis-à-vis those of the members from the CSOs in a specific working group. It is

recommended that these minutes should be drafted either according to statements given by each representative or through the elaboration of summaries of the positions within the sub-topics under discussion. Likewise, the reference to the speakers should be unified in all the minutes by using the surname (ex. [Ms. Manastirliu and not Ms. Ogerta](#)), as a good practice implemented by national and international institutions.

4. Considering that in the current format ASCS should organize elections every year for new members from the civil society in the NCCS, it is needed an in-depth assessment of the opportunities and challenges of holding these elections through the online voting process, so as not to compromise the credibility of the council. Moreover, it is currently an information campaign on the development of the second round of elections on the selection of the new candidates of the NCCS as of September 2018.
5. The technical secretariat of the council should organize informative meetings and discussions with grassroots organizations in order to identify their concerns, which should then be reflected in the council's meetings. These meetings should be followed by concrete outputs and not remain within the

framework of a simple consultation meeting.

6. NCCS should take the necessary measures for a financial incentivization of the members from the civil society, which could ensure their respective engagement and motivation. In this way, there would be also guaranteed the equality with the representatives from the public administration, who participate in the meetings as part of their job descriptions in their respective institutions.
7. NCCS should publish its strategic working plan and calendar of annual activities.
8. Unable to compile an annual report for the timeframe 2016-2017, NCCS should publish a detailed summary for the broader audience on its major developments during those two years.
9. It is needed a review of the practice in repeated cases of non-participation of the members from the CSOs in the working group meetings, as well as the strengthening of the communication and interaction of these members with the representatives from the institutions public, in order to increase continuous effectiveness and stimulus.