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Danish Eastern Neighbourhood Programme January 2027 – December 2031
Programme Document

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Table of contents

Abbreviations	3
1. Programme objectives	4
2. Programme context	4
3. Programme narrative	8
4. Programme rationale	14
5. Programme project portfolio	15
6. Programme budget	23
7. Programme management and reporting	24
8. Risk management	27

Abbreviations

AMG	Aid Management Guidelines
DANEP	Danish Eastern Neighbourhood Programme
CEPA	Comprehensive and Enhanced Partnership Agreement
CSO	Civil Society Organisation
DI	Danish Industry (Confederation of Danish Industry)
EED	European Endowment for Democracy
EU	European Union
EUNABO	EU Neighbourhood Department, Ministry of Foreign Affairs of Denmark
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit (German Corporation for International Cooperation)
IMS	International Media Support
LNOB	Leave No One Behind
LÆRING	Learning and Quality Assurance Department, Ministry of Foreign Affairs of Denmark
MEAL	Monitoring, Evaluation, Accountability, and Learning
MFA	Ministry of Foreign Affairs
NDF	New Democracy Fund
PSF	Peace and Stabilisation Fund
RFI	Results Framework Information
TI	Transparency International
UNDP	United Nations Development Programme

1. Programme objectives

The future Danish engagement in the Eastern Neighbourhood region builds on the lessons learned from two decades of development cooperation in the region. The objectives from the previous phase remain relevant today. The overall objective of the Danish Eastern Neighbourhood Programme (DANEP) is *to consolidate and promote countries' anchoring in the European community of values and strengthen their democratic development and green growth*. The engagement covering January 2027 – December 2031 builds on the experiences and strategic priorities from Denmark's support to the region in the last two decades.

DANEP will thus maintain an overall dual, long-term objective:

- To promote the countries' anchoring in the European community of shared values as well as to strengthen their stability, progress, and resilience and to contribute to the SDGs, and
- To promote opportunities for future cooperation between Denmark and the neighbourhood countries which go beyond the individual project activities.

The programme covers Danish development cooperation with EU Eastern Neighbourhood Countries and selected Western Balkan countries. DANEP's support to the eastern neighbourhood region complements Danish support to Ukraine, as set out in the Country Strategic Framework for Ukraine 2025-2028, as well as the Peace and Stabilisation Fund (PSF) engagement in the region.

2. Programme context

The programme will cover bilateral support to Moldova and Bosnia-Herzegovina (BiH) DANEP also encompass potential for supporting regional and specific engagements in Georgia, Armenia, Azerbaijan, Belarus, and possibly also the Western Balkans. Finally, DANEP encompasses projects under the so-called 'Copenhagen Pre-accession Initiative'¹, which presently primarily focuses on Ukraine and Moldova.

To increase coherence, complementarity, programme-level results orientation and systematic learning, DANEP 2027-2031 is structured into three clusters: 1) Moldova, 2) Bosnia and Herzegovina, and 3) regional engagements. The two country clusters comprise the bilateral support to Moldova and BiH respectively, while the regional cluster comprises regional and multi-country engagements, including targeted regional initiatives involving Ukraine and specific engagements in other countries in the region. A short cluster note is available for each of the three clusters, outlining the geographic and thematic focus, objectives and indicative budget allocations at cluster and project level. The clusters will be used to promote synergy, coherence and learning across projects as well as for communication purposes, while overall budget management and results reporting remain at programme level.

The countries in the Eastern European Neighbourhood and Western Balkans hold different versions of governance and significant differences in economic status and human rights

¹ In 2024 Denmark allocated EUR 20 million for a Danish instrument aimed at accelerating reform and democratic developments, which would provide the basis for pre-accession of Ukraine and Moldova to the EU. For more information, see: <https://ukraine.um.dk/en/news/copenhagen-pre-accession-instrument-denmark-allocates-20-million-eur>

situations. All development cooperation support provided under DANEP should mirror these differences and allow for flexibility and context-specific engagement across this broad context. In the following, the main contextual analysis for each country is outlined, organised according to the three clusters (for more in-depth analysis, see Annex A).

Cluster 1: Moldova

Moldova has made significant strides toward EU accession, officially recognised as a candidate in June 2022 and beginning accession negotiations in June 2024. The 2025 EU Enlargement Report commends Moldova for transparent parliamentary elections, judicial reform, and strengthening anti-corruption institutions. Despite substantial Russian investments in foreign interference, Moldova has held free and fair parliamentary and presidential elections in the last two years, including a referendum on EU accession, which is now part of the Constitution. Challenges remain in terms of ensuring the rights of the most marginalised.

Russia has intensified its hybrid warfare in Moldova, using disinformation and fake news, and financial incentives to undermine the pro-EU government and sway public opinion. The need for countering disinformation remains significant.

Moldova has made progress in anti-corruption, including towards high-level convictions and elimination of networks tied to oligarchs. However, the reform aimed at eradicating corruption within the rule of law are facing resistance and delays, while corruption persists in sectors such as education and health. Continued support to anti-corruption efforts remains highly relevant.

On the green front, Moldova has disconnected from Russia's energy grid and joined the EU grid via Romania, making progress on decarbonization and renewables. The country aims to cut emissions by over 70% by 2030, but implementation lags due to limited administrative capacity and the need for better regulations and market confidence in clean energy.

Serious challenges remain within the areas of employment generation, social dialogue, and poverty reduction. In addition, Moldova has some preparation in labour mobility and social security coordination with the EU, but serious challenges remain in employment, social dialogue, and poverty reduction. Women play a significant role in agriculture but face constraints in accessing resources for production. The government has adopted new programs to combat child labour and promote gender equality, though enforcement and funding gaps persist.

Cluster 2: Bosnia and Herzegovina

Bosnia-Herzegovina was granted candidate status in December 2022, with accession negotiations set to open once key reforms are implemented. Areas in need of reform include the judiciary, anti-corruption, media freedom, and protection of minorities. Constitutional reforms are urgently needed to ensure political equality and non-discrimination. The governance arrangements inherited through the Dayton Peace Accords have provided a degree of stability in the country. However, the governance set-up has simultaneously limited efforts to advance reform and reinforced ethno-political elite capture, while undermining social cohesion and reconciliation efforts. Progress has been made in migration management and border security, but high-level corruption and organised crime remain serious challenges.

In terms of gender equality and marginalisation, unemployment, poverty, and social exclusion remain significant issues. Gender equality and non-discrimination are priorities, but implementation of relevant laws is inconsistent.

Russia has been effective in exploiting ethnic divisions and media fragmentation to amplify disinformation, particularly through pro-Russian outlets and local proxies in the Serb-dominated Republika Srpska. These campaigns seek to weaken Bosnia's EU aspirations and undermine trust in democratic processes.

The country has adopted laws on renewable energy and energy efficiency, but alignment with EU standards is incomplete. The energy sector requires further reform to meet EU market integration requirements.

Cluster 3: Regional engagements

Ukraine officially began EU accession negotiations in June 2024, completing the screening process by September 2025. While the technical process is advancing, full membership is not expected before 2027. The EU remains Ukraine's strongest ally, providing financial aid and integrating Ukraine into key EU frameworks, such as the roaming area as of January 2026. The EU is Ukraine's largest trading partner, accounting for over 50% of its trade in goods, and the Deep and Comprehensive Free Trade Area (DCFTA) continues to strengthen economic ties.

The Russian full-scale invasion has caused profound economic disruption, but Ukraine has shown resilience through international support and trade diversification. However, growth is slowing reflecting ongoing challenges such as labour shortages and energy infrastructure damage.

Ukraine is an electoral democracy under severe wartime constraints. Elections have been postponed as a consequence of Russia's full-scale invasion in February 2022, which brought temporarily occupied territory under harsh authoritarian rule and forced the Ukrainian government to impose a state of emergency, restricting media freedom, suspending elections and centralising executive power under martial law. Despite these constraints, Ukraine has maintained relatively competitive political processes and active civil society mobilisation compared to other countries facing similar security threats.

Despite the war, Ukraine has pushed reforms to strengthen democratic institutions and meet EU accession criteria, such as justice-sector improvements, the 2021 anti-oligarch law, and anti-corruption measures. However, oligarchs still hold significant power, and wartime emergency measures have centralised authority, challenging checks and balances.

While there are no formal legal barriers to political participation for women and minority groups in Ukraine, gender stereotypes, economic disadvantages and discrimination continue to limit their involvement. The war has exacerbated these challenges, particularly in occupied and front-line areas, where violence and repression have further restricted political participation for vulnerable groups.

Georgia's EU accession path has faced significant setbacks, with the government suspending accession efforts until 2028. The country is facing severe backsliding in democratic governance, rule of law, and fundamental rights, including repressive measures against civil society, independent media, and opposition. The adoption of laws restricting civil society and the abolition

of gender quotas in political parties have raised concerns. Judicial independence, anti-corruption, and human rights protection are all being challenged by the present government.

Gender equality has suffered setbacks, including the removal of “gender” and “gender equality” from national laws. UN and EU initiatives continue to promote women’s leadership and economic empowerment, but recent legislative changes threaten to reverse gains. LGBTQI+ have been further marginalised in society in the last years.

As in Moldova, Russia is engaged in disinformation, political subversion, and media control to undermine Euro-integration. These efforts aim to discredit democratic institutions, polarise society, and reverse Georgia’s pro-Western trajectory. Georgia has had some level of preparation in fighting corruption, but the Anti-Corruption Bureau’s excessive information requests and political interference undermine progress.

Georgia has in the past been on a path for enhanced use of renewables, which has attracted private investors, but broader energy transition and environmental reforms are still needed.

Armenia is not yet an official EU candidate but has deepened ties through the Comprehensive and Enhanced Partnership Agreement (CEPA). The country has transitioned from a hybrid regime to a democracy since 2018, with improvements in electoral processes, judicial independence, and human rights. Armenia plans to apply for EU membership in 2026, contingent on further reforms in the rule of law, anti-corruption, and judicial accountability.

Russia has launched an early and aggressive disinformation campaign ahead of Armenia’s 2026 elections to discredit the pro-Western government and sow instability, aiming to erode public trust in democratic institutions and reverse the country’s Western orientation. These tactics mirror those used in Moldova and Georgia, with a focus on exploiting post-conflict vulnerabilities and societal divisions.

Armenia’s reform agenda prioritises gender equality, with strategies to eliminate discrimination and promote women’s leadership in public life. The private sector is encouraged to adopt fair labour practices and non-discrimination policies. However, corruption in public administration and the judiciary continues to undermine trust and economic growth.

The government aims to maximize renewable energy, modernise infrastructure, and liberalise the electricity market.

Azerbaijan is not an EU candidate country. The EU is, however, Azerbaijan’s most important trading partner, and the EU continues to be Azerbaijan’s largest export market. The EU and Azerbaijan have a Partnership and Cooperation Agreement that eliminates trade quotas between the two parties, to align Azerbaijan’s standards with those of the EU. In February 2026, the EU and Azerbaijan agreed to strengthen their partnership under EU’s Global Gateway initiative and the recently launched Cross-Regional Connectivity Agenda.

Azerbaijan is marred by democratic backsliding. The country is witnessing a sharp escalation in the repression of civil society, particularly since the summer of 2023. The government has intensified its crackdown on media, democratic movements, trade unionists, academics, and any form of dissent, eroding the already limited space for independent civic engagement. Persistent

and severe human rights challenges exist, including widespread torture and ill-treatment in detention, gender-based violence, discrimination against ethnic and sexual minorities and the systematic suppression of civil society and media. The Global Gender Gap Index ranks Azerbaijan 100th out of 148 countries, reflecting persistent barriers to women's political and economic participation.

Corruption is widespread, and the formal political opposition has been weakened by years of persecution. Anti-corruption reforms for Azerbaijan have been proposed by the EU but with little success.

Belarus is not an EU candidate and has no formal accession process due to its failure to meet the Copenhagen criteria for democracy, rule of law, and human rights. The EU declared the 2020 presidential elections neither free nor fair, leading to a sharp deterioration in bilateral relations. The Lukashenko regime's crackdown on peaceful protesters, civil society, and independent media has resulted in the EU refusing to recognize Lukashenko's legitimacy and redirecting support to Belarusian civil society and democratic forces. The EU's assistance now focuses on human rights, independent media, education, culture, and SMEs in exile, bypassing the state apparatus.

Corruption remains systemic in Belarus, with no independent bodies to investigate high-level graft and a lack of transparency in government. The state controls at least 70% of the economy, and graft trials are typically closed or result in presidential clemency for convicted officials.

The private sector is heavily restricted, with most economic activity under state control. Women formally enjoy equal political rights and make up 40% of legislators, but they are underrepresented in leadership positions and face systemic discrimination. Independent civil society initiatives addressing gender-based violence or discrimination are suppressed, and the regime has rolled back gender equality programs, replacing them with state-controlled narratives.

Russia exerts overwhelming influence over Belarus, both politically and through disinformation. The Lukashenko regime aligns closely with the Kremlin, adopting Russian narratives and propaganda tactics to suppress dissent and discredit Western democracy. State media in Belarus now effectively rebroadcast Russian disinformation, portraying the EU and NATO as threats to Belarusian sovereignty and stability.

3. Programme narrative

The new DANEP programme is launched at a time when the region is under considerable pressure from Russian interference and disinformation, backsliding democracy in several countries, and challenging economic opportunities. At the same time, the countries included in DANEP are at different stages and different levels of commitment in their EU cooperation and accession approach. The commitment to the EU values, as expressed in the Acquis and the UN conventions of human rights and freedoms, varies across the countries supported. In the present context, DANEP needs to be a programme with the breadth and flexibility that allows it to cover the different opportunities and challenges that are found in each country and across the region. To accommodate this challenge, the programme will build on a number of principles:

- Aligning with the needs of the individual country. While the coverage of the programme may cover several countries in the region, the support is anchored in the needs and

priorities of the individual country in the region. National and local ownership is a core element of support for countries in the region. For countries committed to the values underpinning DANEP, such as Moldova, the programme will seek full alignment with country priorities as expressed in national policies and plans. Where there is a greater need for local engagement, this ownership will be based on local priorities and non-state priorities as expressed by local actors and civil society. Denmark will also support areas which are seen to provide important enabling conditions to advance local ownership and reforms, for example in relation to social cohesion and inclusive governance. Projects are designed based on implementing partners' thorough consultations and studies of the local context and needs.

- Supporting rights-holders as well as duty bearers. For the countries with bilateral partnerships, a considerable focus is on the duty bearers, enabling them to deliver services and perform their duties in accordance with the needs of the rights holders, as expressed in the commitments to EU cooperation and accession. However, across all countries, civil society and independent institutions will remain a core feature of support to hold duty bearers to account. Where countries are facing democratic backsliding and the authorities are not guaranteeing the rights of rights-holders, additional support may be provided to civil society and watchdog institutions.
- Human-rights-based approach (HRBA). DANEP builds on a human rights based approach. Some projects are directly focused on countering discrimination and ensuring the rights of the vulnerable people, focusing on participation and non-discrimination. Other projects are more engaged in ensuring accountability and transparency of public institutions. But all projects should be designed to promote the application of HRBA in practice.
- Gender equality and LNOB. Linked to HRBA, all engagement will seek to integrate gender equality and ensuring Leave No One Behind (LNOB). This means that outputs and indicators will be aligned with this policy priority wherever feasible.
- Support regional and multi-country thematic engagements. This will include specific attention to media, youth, culture and women and gender equality through strengthening civil society. Implementing support across several countries within the same themes allows for enhanced synergies and learning across borders.
- Focusing on areas where Denmark has a comparative advantage. The programme will place specific emphasis on areas where Denmark has a comparative advantage and can provide support relevant to local partners. This includes drawing on specific Danish expertise, such as labour market dialogue, independent media, and mobilisation of youth or cultural exchange. This could include focus on specific thematic areas, such as reforms to enable renewable energy, where Denmark has a strong resource base and therefore much to offer countries in the region.
- Combine portfolio and partners that are mutually supportive. Implementing partners under DANEP will be selected to be mutually supportive. As an example, support to improved dialogue between labour market partners has the potential to strengthen the democratic development as well as contribute to sustainable growth. Similarly, transparency and accountability will also enhance the effectiveness of the energy sector. A strong, independent and diversified civil society is seen as crucial in all democratic societies and is also important across sectors. Consequently, in addition to project-to-project complementarity, several projects will support activities across different focus areas.
- Flexible and adaptable. As is evident from the context section, the countries supported, and the region as a whole, are facing renewed challenges exacerbated by the Russia's

full-scale invasion in Ukraine and beyond, and with the changing political influence across the region. This means that flexibility is needed to address emerging challenges and capture unforeseen opportunities. The programme will therefore be flexible, allowing redesign and reallocation aligned with the Aid Management Guidelines (AMG) of the Ministry of Foreign Affairs of Denmark. In addition, some 18% (DKK 237 million) of the budget has been set aside as unallocated to address emerging needs and opportunities. EUNABO will continuously monitor developments in the region and, together with partners, adapt the programme to the current situation. A separate MEAL system will be established to assist EUNABO receiving the relevant information to make such adaptations.

- Managing risks. The support to the region comes with considerable risks from the political developments influencing Danish support to the financial risks emanating from engaging in countries with relatively higher levels of perceived corruption. Risk management will be part of the EUNABO oversight functions and will be linked to the programme's adaptability to allow for risk management as needed.
- Enhancing localisation. DANEP will strengthen localisation by working more with and through local civil society and other national partners. Localisation requirements will be embedded in the forthcoming project documents, partner agreements and calls for proposals to promote a gradual transfer of ownership and increased budget responsibility to national partners, supported by capacity development for national organisations. Localisation will be advanced through the implementing partners, who will be required to demonstrate how their delivery model transfers still more responsibility and resources to local partners over the course of the programme. For the projects starting in 2028, the localisation approach will be detailed in the full project documents to be developed during 2027.
- Mobilising whole of Denmark. Competencies across Danish civil society and wider community can be drawn upon in the cooperation with local partners. The Neighbourhood Programme will strive to encompass both a '*whole of Denmark*' approach, where specific Danish competencies can be used to share experience and enhance capacities across countries in the region. Building on the decades of cooperation supported through Danish civil society and institutions, DANEP will provide a flexible approach where multiple countries are covered through Danish-European partnerships through the same engagements. This approach will help to promote opportunities for future cooperation between Denmark and the neighbourhood countries, which go beyond the individual project activities.

Strategic objective: Strengthening reform and EU-approximation through the development of democratic institutions and processes, including reform that support green transition and energy security

Democratic development and human rights are at the centre of DANEP support to the region and an objective of Danish development assistance. It is also a core element in ensuring that the countries live up to the 'fundamentals' in the EU accession process.

DANEP 2027-2031 will build on existing strong partnerships to engage with stakeholders at the national and local levels that have in the past been successful in promoting democratic change and human rights. As is evident from the chapter above, each country has a different context, and the actors that DANEP will engage with depend on this context and their capacity. The

programme thereby contributes to democratic development across these different contexts, ranging from countries advancing on the EU accession path to countries experiencing democratic backsliding. To further strengthen the intervention logic, a more in-depth analysis of what is needed to defend democracies across the different contexts in the region will be undertaken during the inception phase of the programme. On this basis, adaptations to the programme and its underlying projects may be undertaken as needed. Under this strategic objective, DANEP will help build the capacity of actors promoting democracy and human rights as well as gender and LNOB as grounded in EU values, and counter misinformation and other actions undermining democratic progress, as well as supporting green growth to the benefit of all in the countries supported. In addition to being a foundation for sustainable economic development in the targeted countries, the support will also help the countries and Europe with increasing energy independence.

The support will be concentrated on five sub-areas.

Sub-area 1: Support the national authorities in building accountable and resilient governance systems to deliver on democratic reforms

Support the national authorities in building accountable and resilient governance systems to deliver on democratic reforms. This covers a broad range of stakeholders and includes:

- Support to local governments to enhance citizen engagement in planning and prioritisation at the local level
- Support to free and fair elections at the local and national level
- Support to watchdog functions to enhance transparency of public administration and counter the misuse of office at national and local level'
- Support to civil society watchdog functions and cross-country networking and learning
- Support to state anti-corruption institutions to counter corrupt practices
- Support to social cohesion, reconciliation, and peacebuilding initiatives geared towards strengthening inclusive governance
- Support for democratic reforms in selected countries, focusing on state institutions and legislation aligned with the EU acquis

Combined, DANEP will focus on the actors that are key to enhancing democratic development in the countries of cooperation. While consolidating democracy and enhancing reforms, this will, as a side effect, also contribute to the countries' alignment with the EU accession criteria. These differ across contexts, and the programme is designed to allow for flexibility to align with these ongoing developments.

Sub-area 1 builds on a number of assumptions to ensure that the projects will be effective. These include:

- That the state institutions supported are receptive to support and the envisaged reform process
- That watchdog institutions have the needed space to allow them to operate according to their mandate
- That civil society has the capacity and receptiveness to engage with the state institutions
- The selected countries remain committed to the EU accession process

Sub-area 2: Free and independent media and countering disinformation

The media plays a key role in the consolidation of democracy and in upholding respect for human rights. Likewise, the media play a key role in countering the significant disinformation currently targeting the Eastern Neighbourhood countries. DANEP will continue to support key actors promoting free media through:

- Support to state institutions and policy enabling media to operate free and fair
- Support to state institutions countering disinformation
- Support to civil society organisations and media countering disinformation and undertaking investigative journalism
- Support to cross-country and regional networking and learning on media and freedom of speech and media resilience

The support will not target individual countries but also promote cross-country knowledge exchange and learning at a time when the challenges for disinformation are increasing. Danish expertise is expected to be a prime contributor to this process. For all partners, the focus will be on capacity development of the targeted institutions.

Sub-area 2 builds on several assumptions to ensure the projects are effective. These include:

- That the civil society organisations identified in the partner countries have the capacity or potential to undertake the desired tasks and/or influence the decision-makers
- That the implementing partners fully understand the political economy in the institutions targeting information management and countering disinformation
- The media have the needed space to enable freedom of speech and investigative journalism

Sub-area 3: Gender equality, women's empowerment, youth and culture

All countries supported under DANEP face significant inequalities and/or marginalisation based on gender, as well as marginalisation of communities based on ethnicity, sexual or religious orientation or age. Equality across gender, sexuality and age is also a fundamental principle of the EU Acquis. Similarly, arts and culture are core aspects of human rights expression, and there remains a need for cultural exchange across countries in the region and with Denmark. Denmark will continue to support key actors promoting equality and empowerment as well as youth and culture, LNOB and non-discrimination:

- Support to organisations working with gender equality, LGTBQI+ and youth for policy advocacy for enhancing equality in different societies
- Support to state institutions working on improving legislation and implementation for enhanced equality, including in relation to women's meaningful inclusion in political processes
- Limiting vulnerabilities of targeted communities through engaging these in local democratic processes as well as in community mobilisation
- Support to culture as a means of cultural exchange and value driven engagement and democratic empowerment
- Support to cross-country and regional networking and learning on gender, youth as well as culture. A core element will be mutual learning and exchange

As with media, the support will not only be national but also promote cross-country knowledge exchange and learning in the region. Danish expertise is expected to be a prime contributor to this process.

Sub-area 3 builds on a number of assumptions to ensure that the projects will be effective. These include:

- That the right civil society partners can be identified and that they have the capacity to undertake the desired tasks
- The state institutions supported have the willingness and authority to implement the anti-discrimination policies and laws
- That all actors have the needed space to undertake their work and are able to navigate the growing backlash and risks facing actors seeking to advance gender equality

Sub-area 4: Labour market dialogue

The sub-area focuses on supporting reform processes that enhance the framework conditions for just economic growth and sound labour markets that are also aligned with ILO and EU conventions and standards. Support will be provided to capacity enhancement of the major labour market institutions and networks as well as ensuring attention to gender equality and LNOB in this work. This includes:

- Support to capacity development of labour market institutions for social dialogue
- Support to capacity development of labour market actors and institutions to engage in social dialogue
- Support to institutional capacities for the inclusion of marginalised groups in the labour market

In the labour market, DANEP will focus on actors key to enhancing just labour market conditions and sustainable growth. The process will also contribute to the countries' enhancing their alignment with the EU. Danish expertise is expected to be a prime contributor to this process.

Sub-area 4 builds on several assumptions to ensure the projects are effective. These include:

- The partner organisations have the interest and willingness to engage in the cooperation for improved social dialogue
- The implementing partners have the network and capacity to ensure that institutions across countries can cooperate on the labour market agenda
- The Danish institutions promoting the support can operate freely in the countries targeted

Sub-area 5: Reforms for delivery of sustainable energy and energy security

DANEP also encompasses focus on support to green transition towards improved green housing and renewable energy as well as support to ensuring energy community in a time of extreme pressure on the region. The focus will be on support to governments and private sector incentives. This includes capacity development for green sustainable housing actors and for energy planning. Denmark will continue to support key actors promoting sustainable and renewable energy through:

- Support for the capacity development for energy authorities in the targeted countries

- Support for inclusive governance in the context of initiatives seeking to advance green transition
- Support that motivates the private sector to engage in green housing and efficiency

DANEP will focus on the actors that (i) influence legislation, and (ii) are actively engaged in the housing sector, from construction companies to individual house owners.

Sub-area 5 builds on several assumptions to ensure the projects are effective. These include:

- The countries supported are committed to the renewable energy agenda
- The business case for investment in green housing is realistic in the targeted countries

4. Programme rationale

The Eastern Neighbourhood has long been a Danish priority area, with support provided over several decades. The engagement in the region has become still more important in light of the Russia's full-scale invasion of Ukraine and the ongoing efforts to destabilise other countries in the region. The engagement is also fully aligned with the countries' accession or cooperation with the EU and the EU's commitment to support this where relevant.

The support is aligned with Denmark's Strategy for Development Cooperation – A Changing World – Partnerships in Development. In terms of approach, the strategy emphasises equal partnerships in the mutual interest of the parties. The approach taken in DANEP underscores the importance of aligning with and following the targeted state's priorities, provided these are aligned with Danish and EU priorities. The Danish strategy also emphasises that the EU should have a leading role in the process, which is underpinned by all the projects under DANEP, with its focus on ensuring alignment with the EU Acquis wherever relevant.

Thematically, DANEP focuses on two of the five priority areas of the Danish strategy:

- A just, sustainable and green transition
- Defence of democracy and human rights

The support is closely aligned with other Danish support in the region. First and foremost, interventions in Ukraine are an integrated part DANEP where the said project engages in cross-regional support. This means that projects only focusing Ukraine is not funded through DANEP. The support to Ukraine is of a size and complexity that requires a separate programme and management setup.² However, the two programmes are mutually supportive with similar objectives and types of support. For some projects, there will be cross-country knowledge sharing and fertilisation, involving Ukraine as well, ensuring that support to all the countries builds on lessons learned across the region.

The Danish funded Peace and Stabilisation Fund (PSF) is implemented in some of the same countries as DANEP. The support of the PSF is focused on security and stabilisation and is thus mutually supportive of the democratic support under DANEP.

² See the Ukraine Transition Programme 2025-2028.

5. Programme project portfolio

The following lists the programme project portfolio: The projects are organised into the three clusters described in the programme context section: Moldova, Bosnia and Herzegovina, and regional engagements. See the specific cluster notes for cluster details.

Project budget totals include grants awarded from 1 October 2026 under the 2026 appropriation, with activities starting from 1 January 2027. In the table, the bilateral projects are listed under the Moldova and Bosnia and Herzegovina clusters, while the multi-country projects are listed under the regional cluster; the Moldova and Bosnia and Herzegovina components of the multi-country projects are reflected in the cluster budgets in Annex 2.

#	Period	Thematic focus	Partner	Geography	Modality	Strategic objective #	Budget (M DKK)
Cluster 1: Moldova							
1	2028-2031	Renewables and energy efficiency*	GIZ	Moldova	Delegated cooperation with GIZ	1	80
2	2027-2031	EU integration*	EU	Moldova	Delegated cooperation with EU	1	80
3	2027-2031	Anti-corruption	EU	Moldova	Delegated cooperation with EU	1	80
Cluster 2: Bosnia and Herzegovina							
4	2027-2031	Gender Equality Generator*	One Un led by UN-Women	BiH	Pooled funds	1	48
Cluster 3: Regional engagements (multi-country projects with components across the three clusters)							
5	2028-2031	Democracy and green growth*	UNDP	Moldova, BiH, regional	Project funding	1	180
6	2028-2031	Gender equality and women's empowerment*	UN-Women	Moldova, Ukraine, Armenia, regional	Project funding	1	80
7	2027-2031	Transparency and accountability	Transparency International	Moldova, Armenia, BiH, regional	Project funding	1	70
8	2027-2031	Media	-	Ukraine, Moldova, BiH, Armenia, regional	Call for proposal	1	150
9	2027-2031	Labour market dialogue	-	Moldova, Ukraine, regional	Call for proposal	1	50
10	2027-2031	Culture exchange	-	Regional	Call for Proposal	1	60

#	Period	Thematic focus	Partner	Geography	Modality	Strategic objective #	Budget (M DKK)
11	2027-2031	Youth empowerment	-	Regional	Call for Proposal	1	80
12	2028-2031	Gender equality through civil society	-	Ukraine, Armenia, Moldova, regional	Call for Proposal	1	50
13	2027-2031	Civil society and democracy	European Endowment for Democracy	Regional	Core funding	1	75
U A	2027-2031		MFA		Unallocated	1	237

**) These projects are expected to be extended or to have a new phase designed during the programme period, and budget has been allocated to them accordingly.*

The projects under the strategic objective are carefully selected to cover key aspects of the democracy, human rights and the sustainable growth portfolio. The projects cover specific engagements with the governments in certain countries implemented through neutral arrangements under UNDP and UN Women, as well as EU, and more direct engagements with civil society partners through selected international NGOs, which provide an arms-length in the support and enable Denmark to reach a broader cadre of local partners.

For the majority of projects, the implementing partner for the new programme has already been engaged in the country and regionally for several years, building on strong local partnerships and solid international experience. To be successful, specific capacities are needed to enable strong partnerships in everything from capacitating women's organisations to countering corruption or disinformation. All partners have a tracked record in their field of expertise. None of the partners have an overlap of engagement, but most projects are complementary. As an example, capacity development for CSOs working with empowering marginalised groups will help these groups engage in elections supported through other partners or to understand and combat disinformation in their communities. For partners chosen through calls for proposal, the capacity assessment and track record will form a key part of the award criteria.

The portfolio is designed to generate thematic synergies across projects. Support to free and independent media reinforces anti-corruption and transparency efforts by increasing public scrutiny, while capacity development of civil society strengthens citizen engagement in the electoral and local governance processes supported through other projects. Improved labour market dialogue contributes to democratic culture as well as sustainable growth, and transparency and accountability interventions enhance the effectiveness of the support to the energy sector and the green transition. Gender equality and youth engagement cut across the portfolio and reinforce the results of the other thematic areas.

Geographic synergies are pursued within and across the three clusters. In the Moldova and Bosnia and Herzegovina clusters, projects complement each other by engaging duty bearers and rights holders around the same national reform agendas, combining support to state institutions with support to the civil society and watchdog functions that hold them to account. The regional cluster enables learning and networking across borders, allowing experience from countries advancing on the EU accession path to inform engagement in more constrained contexts, and

connecting local actors to regional networks and platforms. The cluster notes detail the synergies within each cluster, and EUNABO will use cluster-level meetings and the MEAL system to identify and promote synergies during implementation.

The projects are also expected to contribute to results beyond their own results frameworks. As an example, media support and civil society capacity development contribute to the outcomes on free and fair elections and anti-corruption, gender equality efforts contribute to inclusive governance results across projects, and the strengthening of accountable institutions contributes to the reform results pursued under the EU delegated cooperation. This cross-contribution to results will be captured through the MEAL system, which will monitor progress at programme as well as project level, enabling EUNABO to document how the combined portfolio contributes to the strategic objective and to adjust the portfolio where synergies can be strengthened.

There are several lessons learned, which has informed the DANEP priorities and partner selection. The Danish support to the DANEP countries has been implemented in a period with significant political and economic shifts that has impacted the country context. A significant number of lessons have emerged from this engagement that have informed the new phase. Some of the major lessons learned were documented in the mid-term review June 2025, which underlined the relevance of the programme as well as the complexity of the context surrounding the target countries. An improved overview of the programme has been established and a consolidated approach to programming as well as a clear timeline for the end of the projects funded across the portfolio.

An overarching theme has been the need to be flexible and adaptable in the approach undertaken, the ability to deliver swift results and meet immediate demands, combined with the need to ensure full-fledged partnership in the process. The balance between these needs has not always been easy to strike, and key lessons learned include:

- Flexible arrangements enable Denmark to meet unforeseen needs at a rapid pace. In the past setbacks and progress in the region has required an adapted response in each country and required Denmark to act fast to cater to the changing context. First, the selection of partners mirrors the need for this flexibility. Funding against existing country frameworks, as is the case with for example the support to UN organisations, enables partners to switch between priorities according to context. Second, the significant amount of unallocated funds provides an avenue to address needed adaptations to the evolving context and opportunities.
- Funding to rights holders and well as duty bearers provide a basis for supporting the delivery mechanisms for the supply side institutions - such as the GIZ support to improved housing efficiency and the UN and EU's support to national and local government reform - as well as to the demand side - through extensive civil society support covering broad advocacy through partners such as EED as well as thematic and rights-based civil society such as women's organisations and free media. The combination of partners also allows Denmark to scale up support to governments that are strong on the reform agenda, while enhancing support to rights holders where additional pressure on the government is needed to motivate reform.
- The choice of partners based on capacity assessment in the past and partners' longevity of engagement in the countries targeted means that projects have been implemented smoothly, and demonstrated that they can deliver results. This experience also enables partners to move further towards enhanced local ownership of the support, transferring still more authority to local level partners. Partners within the area of media and the

labour market institutions have worked with the same partners for multiple years, which allows for enhanced performance and trust in local partners, and thus more localisation of funds. Where Denmark engages with newer partners, such as the EU support to integration and anti-corruption, Denmark relies on the strong capacity of the EU to manage and oversee the implementation of these projects.

- Strong partnership with the Danish Embassies in the countries has enabled MFA to engage with more resources in policy dialogue and monitoring, consolidating a whole-of-MFA approach. The Danish Embassies have played a key role in engaging with the partners at the local level and represented MFA in events, as well as conducted monitoring of project progress and challenges. The implementing partners thus already have strong local ties with MFA.
- The existence of a significant amount of unallocated funds has enabled Denmark to respond to emerging opportunities by providing top-up funding to partners where the need is greatest, as the context changes.
- Finally, the partner selection, modalities, and thematic priorities have enabled synergy effects and coherence across the programme. Multiple engagements are mutually supportive and, combined, can motivate change.

For an overview of outcomes and their contribution to the strategic objective see the table below:

DANEP objectives and project outcomes	UNDP transition	UN-Women	One UN	Transparency International	Media	Labour market	Culture
<i>To consolidate and promote countries' anchoring in the European community of values and strengthen their democratic development and green growth</i>	A regional transformation toward green, inclusive, and resilient economies and stability is catalysed, underpinned by participatory governance, civic engagement, and ensuring no one is left behind	1. Duty bearers implement and finance evidence-based gender-responsive normative frameworks and policies.	1. Gender and social norms and attitudes are improved to prevent GBV and discrimination	Three different results frameworks, one for each country. Outcome focus areas: - Independent monitoring of anti-corruption policies and international commitments - Monitoring and improvement of electoral processes	1. Media outlets and journalists conduct evidence-based investigative journalism that supports democratic and free societies.	1. Labour market organisations are strengthened as independent and representative social partners that contribute effectively to reform processes, collective bargaining and inclusive social dialogue at local, regional and national levels, reinforcing a fair and well-functioning labour market system.	1. Cultural actors are engaged in regional networks and co-create international projects supporting social change, including with Danish actors.
		2. Women and girls fully and equally participate in leadership and decision-making processes, a sustainable and inclusive labour market and benefit from gender-responsive governance and services.	2. Expert CSO service-providers receive more sustainable and flexible financing, as well as for related advocacy to counter the anti-gender backlash	- Capacity development and legal assistance to civil society - Strengthening investigative journalism - Monitoring of parliament performance - Monitoring of asset and interest declarations	2. Media outlets can operate and deliver quality, evidence-based journalism without donor support.	2. Labour market actors promote and uphold safe, healthy and equitable working environments aligned with EU and ILO labour standards, strengthening workers' rights and the inclusion of vulnerable and marginalised groups.	2. Cultural actors are capacitated to operate sustainably, and to deliver relevant and accessible cultural activities.

			3. Strengthened policy frameworks are in place for a more gender-responsive care economy, centred on needs-based models for service provision	- Awareness raising on the rule of law	3. Media outlets and civil society in Eastern Neighbourhood countries have the capacity to counter disinformation and ensure that all groups of society have access to relevant, evidence-based, and timely media coverage.	3. Labour market institutions and social partners contribute to a socially just green transition by addressing emerging skills needs, supporting workforce adaptation and promoting sustainable practices in line with European green policy frameworks.	3. Cultural infrastructure in the ENC is functional and accessible for the public, including vulnerable and marginalised groups.
			4. Strengthened institutional knowledge and skills, coupled with enhanced prevention of gender stereotypes, violence and discrimination, are in place for women and girls to cultivate leadership skills, engage equally in decision-making, and take the lead in driving gender-transformative development.		4. Independent media, journalists and media organisations are strengthened by engaging in regional networking and peer-to-peer exchange of experiences amongst civil society actors in the European Neighbourhood countries and Danish journalist, media and CSOs working with media	4. The labour market functions more inclusively and effectively, enabling women, youth, migrants, veterans and other underrepresented groups to access and remain in formal employment, decent work and vocational training.	4. Local cultural actors and initiatives beyond the main partners contribute to a more diverse, accessible and resilient cultural ecosystem
			6. Sound policies and enforceable legislation for the promotion of gender equality and gender-responsive planning, policymaking and budgeting for sustainable development are adopted and improved across all sectors and levels of government		5. Local media actors beyond the main partners contribute to a more resilient, diverse and accessible media ecosystem and respond to emerging democratic and information challenges		

DANEP objectives and project outcomes	Youth	Gender equality through civil society	EED	GIZ Energy	EU pre-accession	EU anti-corruption
<i>To consolidate and promote countries' anchoring in the European community of values and strengthen their democratic development and green growth</i>	1. Youth organisations demonstrate improved governance, financial sustainability, advocacy capacity, and inclusive representation.	1. Women's rights organisations and CSOs deliver high-impact, evidence-based advocacy and services that advance gender justice and equality	1. Strengthened capacity of new and existing pro-democracy civil society actors to operate and survive in the Eastern neighbourhood region	The proven economic viability and benefits in terms of sustainability foster noticeable increase in demand for designs and construction works of nearly-zero energy residential houses and passive houses on the market	Support to the Moldovan authorities in building accountable and resilient governance systems for European integration, including public finance management, justice and migration governance.	1. Consistently implement the legal and strategic framework on anti-corruption, fight against organised and financial crime, including stand-alone money laundering, as well as asset recovery and confiscation, in line with European and international standards, including relevant GRECO, ODIHR and OECD recommendations, with effective co-ordination, budgeting, monitoring and evaluation.
	2. Young people have increased knowledge of democratic systems, rights, ideologies, and EU-related processes, and demonstrate strengthened critical thinking and media literacy skills	2. Women and girls in target countries have improved access to gender-responsive services, justice, and protection from GBV and cyber violence	2. Strengthened relevance of pro-democracy (support) activities based on improved (knowledge) sharing and the development of new (innovative) approaches			2. Demonstrate tangible progress towards a solid track record of investigations, prosecutions and final convictions in corruption, organised and financial crime cases (including money laundering), in particular final convictions on high level cases.
	3. Cooperation between civil society and public authorities is strengthened, resulting in more structured and meaningful youth inclusion in decision-	3. Women's rights organisations and CSOs are strengthened through regional networking and peer-to-peer exchange				3. Demonstrate a systematic launch of financial investigations when dealing with serious and organised and financial crime (including money laundering) as well as an increased number and overall value of seized, frozen and confiscated assets.

	making processes and civil service.					
	4. Young people in rural and underserved areas are increasingly engaged in community-based initiatives and volunteer-driven networks addressing democracy, human rights, inclusion, and green transition	4. Women's leadership and participation in political, economic, and social life are advanced through inclusive policies and societal change	3. More inclusive and pluralistic civil and political processes, dialogue and consensus building			4. Implement a solid anti-corruption mainstreaming system by implementing combating and preventive measures across public institutions, with effective and transparent reporting and monitoring tools in place.
	5. Local youth organisations and initiatives beyond the main, well-known and established partners contribute to a more diverse, inclusive and resilient youth sector					5. Improve the institutional framework, by more clearly defining the powers and functions of law enforcement institutions and strengthening operational cooperation between them, enhancing their effectiveness, independence and integrity, operational, analytical and IT capacities.
						6. Ensure the efficiency of the corruption prevention framework, including by aligning with the EU acquis, such as whistleblower protection, and strengthening asset declaration verification.

6. Programme budget

Below is an overview of the budget for DANEP 2027-2031. See also the budget enclosed in Annex 2. Following the extension of the programme period to December 2031, the budget phasing has been revised accordingly. Grants totalling DKK 130 million will be awarded from 1 October 2026 under the 2026 appropriation, with activities starting from 1 January 2027. Indicative budgets for the Moldova, Bosnia and Herzegovina and regional clusters are presented in Annex 2.

Project	2026*	2027	2028	2029	2030	2031	Total
Bilateral Moldova projects							
Energy Security/Efficiency***			20	20	20	20	80
EU Reform and pre-accession****			20	20	20	20	80
EU Anti-corruption (to be decided)	20	0	20	0	20	20	80
Bilateral Bosnia and Herzegovina project							
Gender Equality Accelerator (One UN led by UN Women)***		12	12	12	12		48
Multi-country projects							
UNDP (reform and green transition)****			50	50	40	40	180
UN Women****			20	20	20	20	80
Transparency International	20	20	10	10	10	0	70
Thematic multi-country projects, including sub-granting for local CSOs							
Media and disinformation	40	30	20	30	30	0	150
Labour market dialogue and empowerment	10	10	10	0	10	10	50
Cultural engagement and twinning	15	15	10	10	10	0	60
Youth empowerment and twinning	20	20	0	20	10	10	80
Gender equality through civil society			15	15	10	10	50
EED	5	20	10	10	10	20	75
Technical assistance		4	4	4	4	4	20
Sub-total	130	131	221	221	226	174	1103
Unallocated funds**		111	21	21	16	68	237
TOTAL	130	242	242	242	242	242	1340

*) Grants shown under 2026 will be awarded from 1 October 2026, with activities starting from 1 January 2027 (DKK 130 million out of DKK 334 million from §06.32.11.10 (2026)).

****) Approximately 14% of the total budget will be spent in Ukraine. A re-examination of the distribution of activities and projects will be carried out after the expiry of the Ukraine Transition Programme in 2028 and the mid-term review of DANEP.*

*****) A re-examination of the structure of the programme will be made in 2027 in preparation of the 2028 grants to UNDP and UN Women, considering the possible integration of the Energy Security/Efficiency project into the UNDP project and of the Gender Equality Accelerator into the UN Women project.*

******) As for the projects marked ***, a new phase of these projects is yet to be designed. The projects are expected to be extended or continued in a new phase, and budget has been allocated to them accordingly.*

The budget has been allocated according to assessed needs and the past experience of working with the partners in the region and their ability to deliver the agreed results. Indicative budget allocations at cluster and project level for the Moldova, Bosnia and Herzegovina and regional clusters are outlined in the cluster notes, while overall budget management remains at programme level.

The unallocated funds are intended to ensure greater flexibility as the programme evolves. The allocations will be based on contextual developments, emerging opportunities, and partner requests. The EUNABO will use partner reporting, EUNABO and Embassy monitoring, LÆRING reviews, and the MEAL data to make adaptations and allocations, based on the criteria in this document. Depending on the size of the allocated budgets, the allocation may require an appraisal by MFA/LÆRING or an external consultant. The allocation will be released in accordance with AMG of MFA. Decisions on the allocation of unallocated funds will be taken at least twice during the programme period. As a minimum, 80-90% of the unallocated funds is planned to be allocated in advance before end 2030.

To guide the allocation of unallocated funds, the following principles apply:

- Top-up of existing projects will be prioritised where these continue to be relevant and effective
- Projects identified must contribute to DANEP's overall and strategic objective
- Projects must be aligned with the strategic priorities identified by DANEP country authorities and/or DANEP civil society
- Projects that enhance authorities' capacity to implement activities directly while also strengthening accountability and transparency will be prioritised
- Projects that meet emerging needs stemming from contextual and political changes not foreseen at the time of designing the current phase of DANEP will be prioritised.

7. Programme management and reporting

EUNABO in the MFA has the full oversight responsibility for managing DANEP in line with the AMG of MFA.³ EUNABO will be responsible for signing the contracts and agreements, engaging

³ In line with the Aid Management Guidelines of the MFA, the Guidelines for Programmes, Projects and Hard Earmarked Multilateral Support and the General Guidelines for Financial Management apply at both programme and project level, while the

in policy dialogue, monitoring implementation, and adapting the programme portfolio according to changing risks, context, policies, and partner performance.

DANEP falls under the Development Cooperation team in EUNABO and has a dedicated chief advisor overseeing the implementation. In addition, EUNABO will have a full-time programme coordinator overseeing the day-to-day implementation of DANEP as well as the implementation of the MEAL contract. Individual programme officers may hold responsibility for specific projects under the programme. The team leader holds the overall responsibility and decides on bringing major changes and risk issues to EUNABO management.

EUNABO will also host yearly learning events, inviting all implementing partners to take part in an annual stock-taking of progress and lessons learned. The events will be used to enhance synergies across the portfolio and to ensure that lessons learned are shared and applied across the programme, and they may focus on specific themes of relevance to most implementing partners. The events will further be used to strengthen coherence and cooperation with other partners implementing Danish-funded programming in the region and, where relevant, with national coordination bodies, giving priority to national and local institutions and practices. In Moldova, this will be complemented by meetings between the Chisinau-based coordinators of Danish-funded programmes. The outcomes of the learning events will feed into the annual stock-taking report and the MEAL system.

Regarding donor coordination, DANEP will work through the existing coordination frameworks and structures in the countries of engagement, anchoring coordination with national authorities and coordination bodies rather than establishing parallel arrangements. EUNABO will support these efforts, including through the programme coordinator, so that synergies are pursued across the wider donor community and are not limited to Danish-funded projects.

EUNABO will undertake joint partner meetings if and when required to share experience and lessons learned and to discuss key changes to the context. Meetings may be organised at cluster level for the Moldova, Bosnia and Herzegovina and regional clusters to promote synergy, coherence and learning within and across the clusters. However, all programme decisions will rest with EUNABO. For the individual projects, the decision-making depends on the project governance structure and whether the project is joint or bilateral with Denmark only. An overview of the project management setup can be found in the table below:

Project	Management arrangements
1: Energy (GIZ)	Delegated cooperation to GIZ. MFA has a seat in the project steering committee
2: EU integration	Delegated cooperation to EU. MFA has a seat in the project steering committee
3: EU anti-corruption	Delegated cooperation to EU. MFA has a seat in the project steering committee
4: Gender Equality Generator (One UN)	Pooled funding through the One UN arrangement led by UN Women. MFA has a seat in the project steering committee in addition to regular bilateral dialogue with UN Women

Guidelines for Pooled Funds apply to the pooled funding modality used for the Gender Equality Generator. Budgets at programme and project level are developed in line with the Financial Management Guidelines, with a clear focus on the cost of results delivery.

5: UNDP	Project funding to UNDP. MFA has a seat in the project steering committee in addition to regular bilateral dialogue with UNDP
6: UN Women	Project funding to UN Women. MFA has a seat in the project steering committee in addition to regular bilateral dialogue with UN Women
7: Transparency International	Project funding to Transparency International. MFA will have bilateral dialogue with implementing partner at headquarter and country level
8: Media	Call for proposal. Contract will be signed with Danish NGO for implementation. MFA will have bilateral dialogue with implementing partner at headquarter and country level
9: Labour market	Call for proposal. Contract will be signed with Danish NGO for implementation. MFA will have bilateral dialogue with implementing partner at headquarter and country level
10: Culture	Call for proposal. Contract will be signed with Danish NGO for implementation. MFA will have bilateral dialogue with implementing partner at headquarter and country level
11: Youth	Call for proposal. Contract will be signed with Danish NGO for implementation. MFA will have bilateral dialogue with implementing partner at headquarter and country level
12: Gender Equality through civil society	Call for proposal. Contract will be signed with Danish NGO for implementation. MFA will have bilateral dialogue with implementing partner at headquarter and country level
13: EED	Core funding. Denmark has a seat on the EED Board of Governors

The quality of the overall DANEP reporting rests of the quality of the monitoring by the individual project partner and their ability to document progress in a solid manner. As part of the partner selection, EUNABO has assessed the MEAL capacity of partners, including monitoring, reporting and the application of lessons learned in the project implementation.

The monitoring of DANEP is first and foremost based on the progress and financial reporting availed by the implementing partner. The reports describe progress against outputs and outcomes, means of verification, assumption testing, and risks. EUNABO will ensure that the reporting also reflect on learning that is useful to the project as well as to the overall programme. All new projects still to be formulated will, where relevant, make explicit reference to relevant EU indicators, including indicators linked to the relevant EU Growth Plan and to the country EU accession reform agendas, allowing progress to be measured against the reform priorities of the countries and aligning with indicators used by the EU Commission. This will be done while ensuring that objectives and indicators remain focused on development purposes, in line with OECD DAC requirements.

To assist with the monitoring and to undertake spot checks of the support provided, EUNABO will enter into a MEAL contract with an external provider. This MEAL unit will provide an overview of the progress of DANEP against objectives, keep track of progress and finances, and capture learning that can be shared across the programme and within and across the three clusters. In addition, EUNABO will also undertake regular monitoring visits.

EUNABO will also rely on the reporting from the embassies in the region. The embassies will also support EUNABO with selected monitoring visits as required or dialogue engagement with country governments or local partners.

EUNABO will use the partner reports and MEAL data as a basis for entering progress into the RFI of the MFA. In addition, the partner reporting the MEAL data on partner performance and MEAL updates on the risk situation will help inform programme adaptation as needed. Triggers for adaptation include:

- Significant changes to context
- Emergence of opportunities reported by partners or identified by MEAL unit or EUNABO
- Performance of the partner
- Significant changes to partner risks

8. Risk management

Implementation of DANEP carries a number of risks that the MFA will need to manage during the course of the programme. For each project supported by DANEP, the related risks are highlighted in the individual project documents, along with their risk management and mitigation strategies. The MFA will monitor the development of these risks and engage in dialogue with the implementing partners or their risk management response.

The risks may be summarised as follows:

- 1) Risks that may influence the implementation of the overall programme
- 2) Risks related to MFA management and response to emerging individual project risks

At the overall programme level, the major risks pertain to:

- i) Contextual changes that may influence overall programme implementation. This includes external changes in individual country contexts that may negatively influence the commitment to reform. It may also concern external negative influence on any of the countries, which may influence the ability of the projects to deliver as planned.
- ii) Reputational risks emerging from countries and projects such as corruption, that may weaken the commitment to support from the EU and Denmark to the partner countries.

At the programme management level, the risks pertain to the response to individual project risks. As highlighted in the project documents attached to this document as annexes, these are very broad but, in particular, pertain to capacity availability and financial risks. Some partnerships are based on joint funding arrangements with separate monitoring arrangements, while others are funded solely by Denmark with less partner monitoring input. The complexity requires that the MFA have the information at hand to ensure relevant, effective and adaptable implementation. The information will assist in adjusting the programme according to the risk scenarios.

The MFA will apply multiple measures to manage the identified risks. In this process, the MFA will draw on the resources it has available to manage the programme. This includes the EUNABO department in Copenhagen and the Danish embassies covering relevant countries. In addition,

the MFA will draw on the external MEAL team to monitor and report on risks for each individual programme. See detailed risk matrix for each of the projects under DANEP.