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The EU's Comitology: An Opportunity for Early Institutional Integration of the Western Balkans

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Ever since 2022, the EU enlargement policy has stepped a gear up, with gradual integration becoming the mainstream narrative for future accessions. This shift reflects a recognition that the EU and candidate countries should deepen their cooperation even prior to obtaining membership. While previous approaches to enlargement focused primarily on aligning regulatory frameworks, accompanied by ongoing efforts to increase access to the EU's single market, the emerging consensus among think tanks stresses the importance of broader institutional engagement. This would allow candidate countries to familiarise themselves with EU decision-making processes, contribute to policy discussions, and develop the administrative capacities required for full membership. One key, yet underutilised, mechanism for such engagement lies in EU comitology.¹ It represents a system of over 200 active committees headed by the European Commission and composed of EU member states' officials, which plays an important role in shaping policies across various sectors. By involving candidate and aspiring candidate countries in these committees, the EU could foster a more structured and inclusive accession process, bridging the gap between candidate and member states.

The paper explores the possibility and extent of participation of the Western Balkans Six (WB6) in the work of comitology during the pre-accession period, assessing the degree to which this form of early institutional integration is utilised. The research examined meeting summaries, rules of procedure,

¹ European Commission. Comitology. https://commission.europa.eu/law/law-making-process/adopting-eu-law/implementing-and-delegated-acts/comitology_en



and relevant directives or regulations of all active EU committees – available at the Comitology Register.² For a committee to be classified as active, it had to have convened at least once since 2022. The research was conducted up until the end of January 2025, allowing for a comprehensive assessment of the most recent developments. Additionally, findings were compared with an analysis conducted on the state of comitology participation in 2023 to identify trends and potential shifts in committee participation. However, the research faced certain constraints, particularly the absence of publicly available rules of procedure or meeting summaries for some committees, which limited the scope of analysis in specific cases. To overcome these, four interviews were conducted with stakeholders from the EU and WB who directly took part in the work of the committees to gain firsthand insight into the work of the committees. The findings support the thesis that participation in EU committees remains an underutilised mechanism for early institutional engagement of the WB6. Strengthening involvement in these structures could serve as a valuable instrument for fostering deeper integration and preparing candidate countries for the complexities of EU decision-making.

Coming Out from the Shadows

With the renewed EU enlargement momentum, civil society organisations (CSOs) have increasingly advocated for widening the gradual integration of candidate countries through earlier institutional participation. The European Policy Centre’s (CEP) and Centre for European Policy Studies’ (CEPS) Template 2.0 for Staged Accession to the EU³ represents the most detailed proposal in this regard, demonstrating that the inclusion of candidate states as observers within the EU’s institutional structures is legally feasible even before full membership. According to this framework, once the European Commission assesses that specific benchmarks have been met, candidate countries should be allowed to participate in EU comitology. Template 2.0 proposes that participation in the comitology could begin already in the pre-accession period. Importantly, there are no significant legal barriers to the Western Balkans’ engagement in this system of committees. Thus, inclusion of the WB6 in the comitology would not only familiarise them with the EU’s decision-making processes but also anchor them more firmly within its governance structures – effectively integrating them into the Union’s bloodstream well before formal accession.

Although often overlooked, comitology plays a crucial role in the EU’s decision-making process, offering a practical framework for EU members’ oversight of the European Commission’s implementing powers. Originating with the Treaty of Rome (1957)⁴, comitology was initially an informal mechanism, largely managed through technical committees. Over time, however, it evolved into a more structured and influential part of the EU’s system. The Lisbon Treaty (2007)⁵ and Regulation No 182/2011⁶ provided the current legal framework, strengthening the committees’ role and formalising procedures. Often described as a “miniature Council,” comitology serves to limit the Commission’s executive authority by ensuring that implementing acts⁷ are subject to scrutiny and input from member state representatives. Today, three types of procedures exist under comitology - advisory, examination and urgency procedures, with the first two being the most significant. These allow members to provide opinions or vote on draft implementing acts proposed by the Commission. Given its collaborative and technical nature, comitology offers an ideal environment for the gradual integration of candidate countries into EU institutions. It enables early exposure to the Union’s governance practices at a specialised level, foster-

2 European Commission’s Comitology Register: <https://ec.europa.eu/transparency/comitology-register/screen/committees?lang=en>

3 Mihajlovic Milena, Blockmans Steven, Subotic Strahinja and Emerson Michael, ‘Template 2.0 for Staged Accession to the EU’, European Policy Centre (CEP) and Centre for European Policy Studies (CEPS), 2023

4 European Economic Community, *Treaty establishing the European Economic Community (Treaty of Rome)*, Official Journal of the European Communities, 1957.

5 European Union, *Treaty of Lisbon amending the Treaty on European Union and the Treaty establishing the European Community*, Official Journal of the European Union, 2007.

6 European Union, *Regulation (EU) No 182/2011 of the European Parliament and of the Council of 16 February 2011 laying down the rules and general principles concerning mechanisms for control by Member States of the Commission’s exercise of implementing powers*, Official Journal of the European Union, 2011.

7 Implementing acts are legal acts adopted by the Commission to ensure uniform implementation of legally binding Union acts (such as regulations, directives, or decisions) across all EU Member.

ing familiarity with EU procedures before membership in a low-risk and less politicised environment.

A Missed Opportunity?

Under the existing framework, virtually no legal obstacles prevent the WB6 from engaging with the vast majority of EU committees. At present, 236 active committees are operating under 31 general directorates, each grounded in legal mandates provided by EU directives or regulations. These committees function in accordance with individually adopted Rules of Procedure, which define their internal working procedures, rules and membership structures. Notably, 204 committees—equating to 87%—explicitly allow for the participation of non-EU countries upon invitation by the committee chair as observers without voting rights⁸. Only five committees explicitly prohibit the involvement of non-EU or non-EEA states, indicating that formal barriers to participation are rare.⁹ For 27 committees, participation parameters remain unclear due to the absence of formalised rules of procedure (see Table 1). Given the legal feasibility of the vast majority of the committees, committees represent a valuable opportunity for early integration of the WB6 into the EU's decision-making processes and to deepen cooperation before accession.

Table 1 – An Overview of WB6 Comitology Participation Possibilities

	Number of committees	Percentage of committees
One or more WB countries participating in the work of a committee	23	10%
Legal possibility for participation exists, but no evidence of WB countries participating ¹⁰	181	77%
No possibility for WB to participate	5	2%
Possibility for participation could not be determined ¹¹	27	11%

Despite the absence of legal barriers, the participation of the WB6 in EU committees remains significantly underutilised. Currently, representatives from at least one WB6 country have taken part in only 23 committees across nine general directorates, representing a mere 10% of all active EU committees. Of these committees, only three committees have seen participation from

⁸ Most committees use the same formulation when it comes to third-country participation. For instance, Rules of Procedures Article 7.2: “The chair may decide to invite representatives of other third parties or other experts to talk on particular matters, on his/her own initiative or at the request of a member of the committee. However, a simple majority of the component members of the committee may oppose their participation in the meeting”. In Article 7.3, it goes on to argue that “Representatives of third parties and experts” shall not be present at and shall not participate in voting of the committee.”

⁹ These include: 1) Accounting Regulatory Committee (FISMA), 2) European Securities Committee (FISMA), 3) Committee for application of the legislation concerning common rules for the development of the internal market of Community postal services and the improvement of quality of service (GROW), 4) Standing Committee on Agricultural Research (RTD), and 5) Appeal Committee (SG).

¹⁰ I.e. not registered in minutes/summaries of meetings.

¹¹ I.e. rules of procedure unavailable.

all WB6, and no single committee meeting has included all WB6 simultaneously. For instance, Serbia leads in committee engagement with participation in 19 committees, closely followed by North Macedonia with 18. Montenegro and Kosovo each participate in 14 committees, while Bosnia and Herzegovina is involved in 12, and Albania lags behind with participation in only nine committees (see Table 2). Notably, the only committee area where at least one WB6 country has engaged with every committee is Education, Youth, Sport and Culture (EAC). This uneven distribution of participation highlights the fragmented nature of WB6 involvement. This may suggest varying levels of interest and capabilities among the WB6 to participate in the committees' work.

The sporadic or absent participation of the WB6 in EU committee meetings is largely due to internal challenges within the region. A closer analysis of the committees in which the WB6 have taken part reveals a correlation between their attendance at committee meetings and their participation in the corresponding EU programmes. Although the WB6 are regularly invited to committee meetings linked to EU programmes they have joined, several obstacles hinder their consistent involvement. Political instability and frequent changes in administrative staff disrupt continuity, while limited institutional capacity often makes it difficult to appoint qualified representatives or those who could solely focus on committees. Financial constraints further hamper participation, especially when in-person attendance in Brussels is required – which explains why online attendance is occasionally permitted as well. According to one of the interviewees, in some cases, there is also a lack of motivation to engage, with certain actors questioning the value of participating without voting rights. Moreover, many officials within WB6 administrations are unaware of the range of committees to which they would have the right to participate in. These factors contribute to fragmented involvement, placing the WB6 at a disadvantage. By not fully engaging, the region misses out on key benefits such as networking with EU counterparts, expressing concerns, and contributing to policy discussions, as well as opportunities for faster alignment and deeper integration with the EU.

Table 2 - Number of committees in which the WB6 participate

	Number of committees	Share of Total Committees
Albania	9	4%
Bosnia and Herzegovina	12	5%
Kosovo	14	6%
Montenegro	14	6%
North Macedonia	18	8%
Serbia	19	9%

From a comparative perspective, the participation of the WB6 in EU committees has seen a modest yet noteworthy increase since 2023 (see Table 3). In July 2023, representatives from at least one WB6 country were involved in 17 committees, representing 8% of all active committees. This figure has now risen to 23 committees, or 10%, indicating gradual progress. Moreover, WB6 countries have expanded their presence into five new general directorates since 2023, as they have joined programmes under those DGs. At the individual country level, Serbia has deepened its involvement by joining four additional committees, while Montenegro's participation rose from eight to 15, and North Macedonia's from 12 to 18. Albania has more than

doubled its participation from four to nine committees, and Kosovo marked the most significant increase, growing from eight to 14. Bosnia and Herzegovina, however, saw the smallest rise, from 10 to 12 committees. These trends suggest a growing awareness and use of the opportunity for committee engagement. Nevertheless, considering that 87% of committees foresee some form of non-EU participation, the current level of WB6 involvement remains low. The underutilised potential across all sectors highlights that the motivation to participate in committee meetings has modestly increased in the past two years and that the WB6 have not fully recognised this mechanism as a way to capitalise on institutional avenues for early integration.

Table 3 - Participation comparison in 2023 and 2025

	2023	2025
Albania	4	9
Bosnia and Herzegovina	10	12
Kosovo	8	14
North Macedonia	12	18
Montenegro	8	15
Serbia	15	19

Moving Forward

Participation in programmes opens opportunities to join committee meetings, as many of them are directly linked to specific programmes—for instance, Creative Europe, Erasmus, and LIFE involve regular committee meetings. Notably, several key programmes such as Horizon Europe, Digital Europe, Fiscalis, and the Customs Programme are highlighted in the EU’s New Growth Plan for the Western Balkans, and all six WB countries currently participate in them. Under the current 2021–2027 Multiannual Financial Framework (MFF), there are a total of 43 programmes, most of which are open to the WB6 upon the signing of an association agreement and payment of a participation fee. Of those, at least one WB6 state participates in 17 programmes in various forms, such as an associated state or affiliate country. Participation in these programmes not only grants access to financial and technical support but also enables the WB6 to attend relevant committee meetings as observers. Therefore, if the WB6 seek to deepen their engagement with EU committees and benefit from being invited to the meetings, they must be more active in requesting to join more EU programmes. Doing so will expand their presence in committees and strengthen their integration into EU structures ahead of full membership.

In the context of ongoing discussions on gradual integration, inviting the WB6 to participate in newly established and thematically relevant EU committees not associated with a programme represents a timely opportunity. Since the summer of 2023, 57 new committees have been created, many of which—where Rules of Procedure are available—explicitly allow for observer participation upon invitation. These include key areas of interest and alignment for the WB6, such as the Customs Code Committee (TAXUD), the Cybersecurity Committee (CONNECT), the Product Security Committee, the Climate Change Committee (CLIMA), the configurations of the Standing Committee on Plants, Animals, Food and Feed (SANTE), and the Quality Policy Committee for agricultural prod-

ucts, wine, and spirit drinks (ARD). Participation in these committees would allow the WB6 to gain early insight into the Union's legislative and technical processes, build institutional capacity, and align more closely with EU standards and practices during the pre-accession period. This form of involvement would, thus, not only deepen their practical engagement with the Union but also help smooth the path toward membership by building the necessary administrative capacities ahead of accession. As such, extending invitations to new and relevant committees would be a concrete step towards fostering the gradual integration of the WB6 into the EU's institutional framework.

Recommendations:

- The European Commission should compile and share a comprehensive list of committees open to candidate country participation, and systematically extend invitations to encourage their involvement.
- The European Commission should openly and proactively communicate with candidate countries regarding the potential benefits of participating in committee meetings.
- Having in mind that the vast majority of committees allow participation as observers of third countries, the Western Balkan governments should proactively request participation in the meetings of EU committees that address pertinent issues in their accession process.
- Candidate countries should take part in all committee meetings to which they are invited by the European Commission to build networks, voice their concerns, and contribute constructively to policy discussions. As participation in the committees is also a part of their accession process, candidate countries should strengthen administrative capacities and allocate financial means to attend meetings in person.

ANNEX – Committees in Which the Western Balkans Six Participated¹²

	Name of the committee	DG	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia
1	Digital Europe Programme Co-ordination Committee	CONNECT	No	No	No	Yes	Yes	Yes
2	"Creative Europe" 2021-2027 Programme	EAC	No	No	No	No	Yes	Yes
3	Erasmus+ 2021-2027 Committee	EAC	No	No	No	No	Yes	Yes
4	European Solidarity Corps Programme Committee	EAC	No	No	No	No	Yes	No
5	Programme Committee for the specific programme implementing Horizon	EAC	No	No	Yes	Yes	Yes	Yes
6	LIFE Committee	ENV	No	No	No	No	Yes	No

¹² European Commission's Comitology Register: <https://ec.europa.eu/transparency/comitology-register/screen/committees?lang=en>

7	Single Market Programme – Competitiveness and Sustainability of SMEs (SMP/COSME) Committee	GROW	Yes	No	Yes	Yes	Yes	Yes
8	Programme Committee for the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation – Civil Security for Society	HOME	Yes	Yes	Yes	Yes	Yes	Yes
9	Consumer Financial Programme Committee (CFPC) 2021-2027	JUST	No	No	Yes	Yes	Yes	No
10	Citizens, Equality, Rights and Values” Programme Committee	JUST	No	No	Yes	No	No	Yes
11	Single Sky Committee	MOVE	No	Yes	Yes	Yes	Yes	Yes
12	Programme Committee for the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation – Strategic configuration: Strategic overview of the implementation of the Specific Programme and coherence across its individual work programmes, including missions	RTD	No	Yes	Yes	No	Yes	Yes

13	Programme Committee for the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation - ERC	RTD	No	No	No	No	Yes	Yes
14	Programme Committee for the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation – Research Infra-structures	RTD	Yes	Yes	Yes	Yes	Yes	Yes
15	Programme Committee for the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation - Health	RTD	No	Yes	No	Yes	Yes	Yes
16	Programme Committee for the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation – Culture, Creativity and Inclusive Society	RTD	No	No	No	Yes	No	Yes
17	Programme Committee for the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation – Digital Industry and Space	RTD	Yes	Yes	Yes	No	No	Yes

18	Programme Committee for the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation – Climate, Energy and Mobility	RTD	No	Yes	No	No	No	Yes
19	Programme Committee for the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation – Food, Bioeconomy, Natural Resources, agriculture and Environment	RTD	No	Yes	Yes	Yes	No	Yes
20	Programme Committee for the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation – The EIC and European Ecosystems	RTD	Yes	Yes	No	Yes	Yes	Yes
21	Programme Committee for the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation – Widening Participation and Strengthening the ERA	RTD	Yes	Yes	No	Yes	Yes	Yes

22	Customs Programme Committee	TAXUD	Yes	Yes	Yes	Yes	Yes	Yes
23	Fiscalis Programme Committee	TAXUD	Yes	No	No	Yes	Yes	No



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