

EU For Integrity Programme

EXECUTIVE SUMMARY

The EU For Integrity Programme (referred to as the "EaP Programme") is designed to support the implementation of open government reforms in the Eastern Partnership (EaP) region—Armenia, Georgia, Moldova, and Ukraine. With Phase I of the program (2020–2024) concluding after an investment of over €2.5 million, the OGP Support Unit reviewed the outcomes achieved and the contribution of key factors and stakeholders in reaching those results. Below are a few insights from the report.



Insight # 1

OGP not only delivered on all of the expected outcomes in the EaP programme, but also yielded some unexpected positive outcomes along the way. The EaP Programme stress-tested OGP's strategy as the region faced seismic geopolitical shifts just after the EaP Programme began - including Russia's war against Ukraine, rapid decline of civic space in Georgia, and EU convergence for Moldova, Ukraine and Georgia. This posed both significant political challenges as well as opportunities for all stakeholders. The outcomes demonstrate that the OGP Support Unit and reformers in the region were able to adapt and use resources strategically to maximize results from Phase 1 of the program.



Insight # 2

The EaP Programme enabled OGP to go beyond business as usual in explicit and tangible ways, allowing it to achieve outcomes in the following areas:

Greater government ownership of reforms: The EaP Programme enabled OGP staff to repeatedly advocate for better alignment of open government reforms across national and regional instruments (e.g. EU, OECD, GRECO) with high-level political decision makers. Government stakeholders note that the alignment reflects greater government ownership and increases the likelihood of implementing reforms. It has also allowed civil society to amplify their demands across multiple platforms - giving them a higher chance of being heard.

Innovations in engaging civil society organizations (CSOs): OGP engaged CSOs not typically part of the OGP process, and experimented with ways to build the ecosystem of reformers in the region. Through the EaP Programme, 18 out of 19 CSOs were first-time grantees in the EaP countries, not having been directly funded by OGP before. In Armenia, Georgia and Moldova many CSOs engaged the general public in government policies, programs and reforms. In all EaP countries, CSOs were also resourced to support reforms outside of the action plan. However, the long term impact - in terms of integrating successful CSO initiatives into government programs, or building the civic muscle of the general public is yet to be seen, although Armenia is showing promise.

Better connections between reformers across countries: Although peer exchanges are a consistent feature of the OGP platform, the EaP programme added value in enabling more frequent opportunities across countries to network, exchange experiences and grow expertise in specific subject matters.

Improvements in Armenia and Moldova's latest co-creation process: Compared to the previous action plan, Armenia's co-creation process for the fifth action plan included consultations with a wider geographic reach and more proactive awareness raising by the government. The EaP Programme as well as UNDP supported the novel approaches used in consulting diverse stakeholders. Moldova on the other hand, went from having a stalled OGP process to having a thriving space for government-civil society dialogue.

Unexpected outcome

Potentially sustained funding: OGP staff potentially improved the funding landscape for reformers in one of two ways - either by helping funders identify government and CSO reformers who needed support beyond the EaP Programme, or by amplifying the results of its grantee projects, sparking donor interest and paving the way for continued funding.

Insight # 3

The OGP Platform on its own also drove key outcomes listed below. The OGP platform offers every member country a set of universal benefits from joining the partnership - including stronger dialogue between government and civil society, better ambition of action plans, and an OGP Local program. It is reasonable to assume that these outcomes could have been achieved even in the absence of an EaP Programme, albeit perhaps over a longer period of time.

Strengthened dialogue between government and CSOs: All countries except Georgia strengthened government- civil society dialogue in OGP processes over the course of several action plans, including those undertaken during the EaP Programme. The progress is emblematic of the repeated cycles of putting OGP co-creation principles into practice over many years. In Armenia, for example, stakeholders highlighted a ‘culture of collaboration’ that has developed over many years between government and CSOs.

Unexpected outcomes

Increased ambition in action plans: Both Armenia and Ukraine showed an improvement in ambition of their action plans - from its fourth to fifth action plan, and fifth to sixth action plans respectively. While Armenia’s progress reflects its long trajectory of OGP membership, including incorporating IRM recommendations to improve the ambition of its action plan, Ukraine’s EU integration process heavily influenced its action plan, following the granting of EU candidate status in June 2022.

Scaling local open government: While not in the original design of the EaP Programme, its resources were used to diversify OGP’s strategy in Georgia, given the absence of the national action plan as a lever for reforms and rapid democratic backsliding. The EaP Programme was also used to advance local government participation from other EaP countries - with the first locals joining from Moldova and Kyiv. However, the presence of the OGP Local Program, as well as OGP staff’s ability to leverage influential funders like USAID and UNDPs work with local governments were stronger contributing factors in advancing local open government.

Insight # 4

Armenia stands out as the country which demonstrated the strongest progress on all of the outcomes listed above. The EaP Programme enabled OGP to provide whole-of-action plan support to Armenia. For example, over 90 percent of grants to support implementation of reforms went to Armenian CSOs -a stage of the OGP action plan not typically supported across member countries. CSO initiatives on whistleblower protection and citizen’s budgets were incorporated by the Ministries of Justice and Finance respectively. But Armenia also has a history of participation and sustained support in OGP that extends beyond the life of the EaP Programme. Stakeholders note that there is a growing culture of collaboration between government and civil society owing to the OGP platform. Armenian CSOs had also received two rounds of support from OGP’s Multi-Donor Trust Fund (MDTF) in years prior to the EaP Programme.

Insight # 5

OGP successfully matched in-country demand for open government with the right supply of resources, capacity, and guidance at just the right time. The EaP Programme allowed SU staff to focus their attention on four countries, enabling them to be agile and responsive to the unique needs of reformers. This led to not only tangible financial support for reformers and their initiatives but also the intangible benefits of building lasting relationships and alliances among reformers. The speed and intensity with which these outcomes were achieved provide a strong proof of concept for OGP’s “advanced support” model—showing how focused and timely assistance can drive meaningful change.

TABLE OF CONTENTS





Introduction	1
What did OGP plan to achieve in the EaP region?	1
Emerging Insights	2
What actually happened? To what extent did OGP contribute?	2
Explicit and Tangible Outcomes	3
Government Ownership	3
Implementation and Monitoring of Reforms	4
Armenia	4
Ukraine	5
Moldova and Georgia	5
Ecosystem Building and Relationships Between Reformers Within Countries	6
Civil Society Capacity and Engagement	7
Implicit and Intangible Outcomes	8
Ecosystem Building and Relationships Between Reformers Within Countries	8
Unexpected Outcomes	9
Ambition in Action Plans	9
Scaling Local Open Government	9
Externalities	10
Programmatic Implications	11
Sustainability of Outcomes in the EaP region	11
Adaptation of Strategies in Other OGP countries	12
Methods	13-15

INTRODUCTION

The EU For Integrity Programme (referred to as ‘EaP programme’) supports the implementation of open government reforms in the Eastern Partnership Region (EaP) by leveraging the OGP platform and civil society engagement. Total support for Phase I of this EaP Programme was over EUR 2.63 million, with OGP co-financing at EUR 132K for a period of four years from 2020-2023. The EaP Programme covers operations in Armenia [1], Azerbaijan [2], Belarus, Georgia, the Republic of Moldova, and Ukraine.

Following the completion of Phase I of the EaP programme, the OGP Support Unit took stock of the outcomes achieved, and the contribution of key stakeholders to those outcomes. The ambition of the program, along with the level of funding and support dedicated to a few countries in the region, warranted a closer look at how OGP was able to leverage the EaP Programme to achieve its goals in the EaP, and what it means for the design and programming of future support to OGP member countries.

What did OGP plan to achieve in the EaP region?

	‘Outcomes’ as articulated in the EU For Integrity Programme
<div>Government ownership</div> <div></div>	<ul style="list-style-type: none">● High-level political support secured from key reformers and champions
<div>Implementation and monitoring of reforms</div> <div></div>	<ul style="list-style-type: none">● Improved delivery and monitoring of open government reforms, particularly in the areas of anti-corruption, justice sector and public administration● Improved delivery of open government reforms that harness technology to address high-level corruption● Increased civil society access to innovations and tools for strengthening civil society and citizen monitoring of government programs and policies, particularly those related to addressing high-level corruption
<div>Ecosystem and relationships between reformers</div> <div></div>	<ul style="list-style-type: none">● Strengthened dialogue between government and civil society on OGP multi-stakeholder forums (MSF)● Government and civil society working on anti-corruption reforms in EaP countries are better connected
<div>Civil society capacity and engagement</div> <div></div>	<ul style="list-style-type: none">● Enhanced participation of civil society in developing and implementing OGP national action plans● Enhanced participation of stakeholders working on reforms in corruption-prone areas in open government policy design and implementation processes

[1] Since Azerbaijan was suspended throughout the whole of Phase I (eventually withdrawn from the Partnership in August 2023), the impact there was expected to be much more limited, as our interventions were limited to managing the response policy process (and limited continued engagement of civil society).

[2] Though Belarus is not a member of OGP, as it does not meet the eligibility criteria, the EaP Programme initially anticipated engagement with civil society actors in the country to discuss potential opportunities for joining the OGP network. Due to the unprecedented nature of Belarus’ suspension of the EaP membership, as well as its engagement in the Russia-Ukraine war, the EaP Programme activities for Belarus have been put on hold indefinitely.

EMERGING INSIGHTS

What actually happened? To what extent did OGP contribute?

To address this question, the report examines both the intended outcomes outlined in the EaP Programme and the unexpected outcomes that emerged beyond the program’s scope. These outcomes are categorized as follows:

Explicit or tangible outcomes: Changes that are easily observed and measurable, such as shifts in policies, laws, and institutional practices.

Implicit or intangible outcomes: Changes that are noticeable but harder to measure, such as improved relationships between stakeholders or the adoption of norms and mindsets that support reform.

The report also considers externalities—unexpected outcomes resulting from OGP’s EaP Programme. However, these externalities do not directly impact OGP’s programs or stakeholders.

To explore the factors contributing to these outcomes, the report analyzes OGP’s role, including what the model and platform provide to members through the Support Unit, and the additional value the EaP Programme brought. It is worth noting, however, that interviewees often referred to OGP’s broader contributions, making it difficult to clearly distinguish between the organization’s overall impact and the specific role of the EaP Programme.

EXPLICIT AND TANGIBLE OUTCOMES



Government ownership

In Armenia, Moldova and Ukraine - **the alignment of open government principles and action across different government strategies - emerged as a reasonable proxy for government ownership of open government reforms.** Over three years, OGP staff conducted more than 100 high-level engagements with political decision-makers, using these opportunities to advocate for better integration and alignment of open government reforms within national and regional frameworks [3].

Government stakeholders across the three countries unanimously highlighted the potential impact of this alignment. They mentioned that the inclusion of government priorities in an OGP action plan increases the likelihood of them being implemented, owing to the elements of the OGP model - independent accountability, global visibility, and civil society engagement [4]. Additionally, embedding the same reform across multiple frameworks can streamline and simplify implementation. For instance, Moldova’s latest OGP action plan includes commitments that implement requirements for accession to the European Union (EU) and recommendations made by Group of States against Corruption (GRECO), the United Nations Convention against Corruption (UNCAC), the Tromsø convention and Organisation for Economic Co-operation and Development (OECD) [5].

In Armenia, the OGP-suggested participatory governance unit is taking shape in the Prime Minister’s Office under the tutelage of the Chief of Staff and OGP high-level government Point of Contact (PoC). Crucial reform frameworks such as the Public Administration Reform Strategy and the upcoming Anti-corruption Strategy have been aligned with the OGP action plan. Several commitments also [address](#) recommendations by the OECD and the GRECO. Interestingly, while civil society organizations (CSOs) noted that the government planned to implement the activities regardless of the inclusion in the OGP action plan, government stakeholders interviewed in Armenia argued the opposite - that inclusion in the OGP action plan ensured their credible implementation.

In June 2022, the EU granted candidate status to Ukraine and Moldova, followed by Georgia (though later suspended) in December 2023—midway through the EaP Programme. While acknowledging some recency bias, government and civil society stakeholders agreed that EU candidacy has significantly advanced open government reforms and created new opportunities to align reforms across different frameworks.

In Ukraine, stakeholders note that the impetus for open government reforms first came from OGP and were eventually adopted as part of other international agreements. For example, the adoption of the draft law [6] on public consultations is a requirement for the OGP process, the Ukraine Facility and is now a part of the EU accession requirements. The EU’s recommendations to improve open ownership standards in Ukraine has in turn given momentum to Ukraine’s existing OGP action plan commitments on beneficial ownership. Outside of the EU context, Ukrainian civil society highlighted the Extractive Industries Transparency Initiative (EITI), which they had long advocated for, as an example of how international frameworks gain momentum when tied to OGP action plans. EITI commitments, for instance, became actionable only after being included in Ukraine’s first OGP action plan in 2012.

In OGP’s early years after its launch in 2011, [researchers](#) had noted that the platform was often seen as a standalone initiative by domestic reformers, siloed and disconnected from the government’s broader national development priorities. This was one of the factors affecting implementation of commitments. The recent developments reflect greater government ownership and create an opportunity to understand whether it will improve implementation and results of open government reforms.



OGP is a very specific instrument for us to push some ideas through our governmental structures, like the Ministry of Energy. We have good working relations with the authorities, but when they have special obligations according to the OGP action plan, this helps with advocacy from the civil society side.

— Ukrainian civil society representative



Aligning open government across government strategies has also been a helpful leveraging factor for civil society in the EaP countries. It has allowed civil society to advocate for the same demands across multiple platforms - be it the OGP action plan, EU accession, OECD or other instruments - amplifying the message and giving it a higher likelihood of being heard. In Georgia and Moldova, civil society stakeholders noted that the EU integration process requires commitments that are largely in line with the demands of civil society to be included in the decision-making processes of government - and that these were the same demands made for OGP processes and other instruments [7]. For example in Moldova, new EU regulations require the Parliament as well as the State Chancellery to set up consultative groups which include civil society [8].



If you have the opportunity to talk on more platforms about the same issue, you finally get the chance to be heard - because you engage the authorities from different angles and the problem gets addressed. It's a window of opportunity that may close very quickly.

— Nicolae Panfil, PromoLex, Moldova



[3] EU Interim Report for Year 3 of the EaP Programme implementation.

[4] Focus group discussion with government PoCs from Armenia, Moldova, and Ukraine.

[5] N. Postica, State Chancellery of Moldova. Focus Group Discussion. June 6, 2024.

[6] The President has signed this law but it will come into full force after the end of emergency state due to the war.

[7] S. Kevshishvili, Transparency International Georgia. Focus Group Discussion. June 7, 2024.

[8] N. Panfil, Promolex, Moldova. Focus Group Discussion. June 7, 2024.



While all EaP countries adopted their fifth action plans during the EaP Programme period of 2020-2024, only Ukraine [9] and Armenia's action plans could realistically be assessed for the implementation and monitoring of reforms through available IRM results reports and independent research. Armenia's case stands out, both in terms of engaging the broader public in implementation, as well as OGP being able to support the entire action plan cycle beyond co-creation.



Armenia

[IRM](#) as well as [independent research](#) highlights that the fifth OGP action plan (2022-24) enables strong progress on its anti-corruption commitments. This includes automating asset declarations, creating integrity systems in local municipalities, and integrating beneficial ownership data in a new eProcurement platform. Recently, the government adopted amendments that provide more opportunities to CSO's for oversight in public procurement projects. This decision was published in the e-draft platform for public consultation: according to the [justification](#) it allows more flexibility for public oversight and the amendments are based on discussions with CSOs [10].

The EaP Programme disbursed roughly EUR 187K for implementation of reforms in the fifth action plan, of which over 90 percent went to Armenian CSOs (roughly EUR 170K) to support the implementation and monitoring of key commitments on fiscal openness, access to information, whistleblowing, and justice. The large proportion of implementation grants going to Armenia was largely due to the fact that only Armenia had co-created and devised an Action Plan in time for implementation grants to be able to be disbursed on time.

The EaP Programme has had an immediate impact by providing substantial resources to civil society, enabling their active participation in the implementation and monitoring of reforms—an aspect of the OGP action plan that is rarely supported in most member countries [11]. This was further supported by more cooperative government counterparts, owing in part to OGP being coordinated through the Prime Ministers Office and in part to OECD and GRECO recommendations to engage civil society. Stakeholders highlighted that the Ministry of Finance (MoF) in Armenia has been more forthcoming in championing civic participation in public finance policy development, procurement and budget monitoring. The MoF also decided to [provide funds](#) for participatory budgeting in the local municipalities where it was initially piloted. The Ministry of Justice incorporated the Armenian Lawyers Associations' (ALA) recommendations for improving the regulations on E-Court Statistics and the Gift Registry - highlighting a case of successful policy advocacy and influence on the government's judicial reform initiatives. In contrast to the state-run platform, the ALA also created a standalone whistleblowing platform which could contribute to better monitoring of compliance with the Gift Registry, as well as other reforms tackling high-level corruption through citizen reporting in the public interest.

Perhaps more notably, the EaP Programme's contribution was seen in supporting several grants which aimed to engage the Armenian public and increase public awareness of government policies, programs and reforms [12]. It allowed domestic reformers to go beyond supporting civil society engagement in the action plan, to engaging citizens and the general public - which is a core element of OGP's new strategy to mainstream open government. For example, CSO grantees estimate that roughly 60 percent of Armenia's population was reached through awareness raising campaigns on policy reforms on Facebook and live TV talk shows. For a country of 2.4 million, the long-term impact of these initiatives could prove to be potentially transformative in building the public muscle to engage in political life.

“



The Deputy Minister of Finance asked us to help them to improve the citizen budget, and prepare a more user-friendly version. Then with his letter of support, we applied for the second grant to develop the citizen budget in 2024.

— Haykaz Fanyan, Armenian Center for Socio-Economic Studies (ACSES), Armenia

”

[9] Ukraine also submitted its 6th action plan during this period.

[10] [Amendments](#) to the government decision were adopted recently (23 May 2024).

[11] Evidence from [OGP's independent evaluation](#) found that civil society engagement drops during the implementation of the action plan.



Ukraine

Amidst the challenges of Russia's full-scale military invasion of Ukraine, which understandably shifted the government's priorities, Ukraine's 2021-23 action plan saw slightly lower implementation levels compared to its previous plan. Even so, half of the commitments showed promising early results, including progress on beneficial ownership verification and extractive sector reporting. The role of international donor support was key in driving these commitments forward.

The EaP Programme helped implement research on e-contracting and funded CSOs who conducted an independent audit of state registers, which was then used to develop recommendations on the ultimate beneficial ownership (UBO) verification system. However, the IRM assessed this commitment as having produced marginal results so far, as a number of regulatory and practical steps are still needed for a functioning and comprehensive verification system.

Civil society stakeholders note that UBO has been a flagship reform for OGP in Ukraine, bringing it the political visibility it needed for implementation. Domestically, OGP's relationships with public authorities including the cabinet minister greatly facilitated the audit, allowing CSOs to access internal sensitive information. The public authorities subsequently asked CSOs to propose mechanisms to improve the UBO verification system [13]. UBO remains a priority for Ukraine following the recommendations from the European Commission for EU membership.

“



Without OGP pushing for these specific reforms, the government would not initiate them on their own. No way. I don't believe it. So thanks to OGP pressure, it came through. If you ask public authorities what needs to change, they will propose easy changes. But the OGP brand brings with it independent views of experts who are well-respected.

— Natalia Chernogub, YouControl, Ukraine

”

CSOs Transparency International (TI) Ukraine and Construction Sector Transparency (CoST) Ukraine were also supported by the EaP Programme to improve Ukraine's e-procurement system and monitor infrastructure projects respectively, though these projects had to rapidly pivot to other priorities with the outbreak of the war.



Moldova & Georgia

Although Moldova and Georgia have forthcoming assessments of the implementation of their fifth action plan, the EaP Programme did support several CSOs to use technology to implement reforms that had notable early outcomes. In Georgia, the Center for Civil Integration and Inter-Ethnic Relations developed an online platform to engage school communities and active citizens in monitoring and reporting on performance of educational institutions. It familiarized at least 100 school and local communities with the platform, encompassing all 2,085 public schools in Georgia. ForSet, another CSO, pioneered the creation of Georgia's first Freedom of Information (FOI) request tool, AskGov.ge. The EaP programme funded its creation, and the platform witnessed a [remarkable increase in users](#), growing from 9,300 to 21,000, surpassing the ambitious project goal of 13,000 users. Relatedly, the number of FOI requests doubled from 1,300 to 2,600, exceeding the target of 1,500.

In Moldova, the Association for Efficient and Responsible Governance (AGER) developed the [Revizia.md](#) portal to [boost civic awareness and engagement](#) in the fight against procurement fraud. In the Moldovan cities of Bălți and Cimișlia, citizens reported 184 local problems, launched 10 initiatives, and participated in 13 surveys initiated by the city halls - using another [platform](#), developed by Moldovan CSO Mediapoint. The Association for Participatory Democracy (ADEPT) developed the only [platform](#) of its kind in the country that offers comparative and user-friendly information on the performance in the provision of public utility services for the 31 urban localities.

As in Armenia, the EaP Programme allowed OGP to go beyond supporting civil society engagement in the action plan, to engaging citizens and the general public in Moldova and Georgia. **Notably, the reforms supported in Georgia and Moldova were outside the action plan. However, in Georgia's case the education monitoring platform did not seem to be connected to the Ministry of Education, preventing its longer term integration into the government.** The end of Phase II of the EaP Programme will be an opportunity to assess whether OGP was able to plant the seeds for strong public support for open government reforms in the region, and generate the bottom-up demand for political leadership to take action on critical reforms.

[12] Column L. Note that these are grantee reports, and an independent assessment of the impact of these initiatives is not available yet.

[13] N. Chernogub, YouControl, Ukraine. Personal communication. June 7, 2024.



All countries except Georgia strengthened government- civil society dialogue in OGP processes over the course of several action plans, including those undertaken during the EaP Programme. The progress is emblematic of the repeated cycles of putting OGP co-creation principles into practice over many years. This is supported by [IRM assessments](#) of the co-creation process before the EaP Programme began. The EaP Programme was able to add value by supporting Armenia and Moldova's latest co-creation process.

Armenia made steady progress in improving its co-creation process, climbing the IRM rankings from "consult/involve" during its second action plan to "collaborate" by the fourth. With its fifth action plan—developed with support from the EaP Programme—the process expanded even further, featuring consultations that reached more regions and proactive efforts by the government to raise awareness.

While Armenia doesn't have a formal multi-stakeholder forum (MSF), stakeholders shared that the action plan generally reflects the priorities of both government and civil society. They also praised it for being more strategic and comprehensive than earlier plans. Innovative approaches to consulting a diverse range of stakeholders were supported by both the EaP Programme and UNDP.

Armenian government representatives noted that the culture of collaboration between government and civil society has significantly improved throughout Armenia's participation in OGP, beyond the scope of the EaP Programme. They credit OGP with bringing this collaborative spirit into public administration. As one government stakeholder put it: "Now we have CSOs that have been working with the government for over 10 years"—showing that a meaningful relationship and mutual understanding has grown between reformers inside and outside government.

“



We see the changes in behavior of some public administration representatives. Before they feared sitting at the table and promising things, but now they are asking us (Prime Minister's Office) to call our colleagues from CSOs and how we can institutionalize this practice. They now understand that developing the capacity of CSOs and having them work on the ground can also assist us.

— Lilya Afrikyan, Office of the Prime Minister, Armenia

”

Ukraine made solid progress in its co-creation process, moving from “involve” to “collaborate” on IRM assessments between its second and fifth action plans—well before the EaP Programme even started. Its official MSF, the Coordination Council, was still active when the war began, showing the strength and resilience of the OGP structures built over the years. During the EaP Programme, the inclusion of new, diverse members from outside the government in the Coordination Council helped boost civil society's role in overseeing the development and implementation of the action plan. Civil society representatives [commended](#) the Cabinet of Ministers for keeping Ukraine's OGP process on track despite the immense challenges of the ongoing war.

In Moldova, while there was a four-year gap between the fourth and fifth action plans, the latest plan marked the creation of its MSF—the new Coordination Committee—which included high-level government officials. Stakeholders applauded the State Chancellery for leading the co-creation process under tight deadlines, with limited resources, and in a complex political environment. OGP played a key role in restarting the co-creation process, astutely timing it with Moldova's EU accession efforts and renewed political momentum in 2023. Moldovan government stakeholders also highlighted how OGP's support, including a peer exchange with Ukraine's MSF, was particularly helpful in shaping their approach.

“

We recommend to the government authorities to include civil society in consultative processes. For example, we have working groups on the EU accession processes. For the first time, CSOs are involved in the National Security Council and in the implementation of the National Security Strategy.

— Natalia Postica, State Chancellery, Moldova

”

Georgia's case illustrates how civil society used all the levers available through the OGP platform to engage the government in the face of rapidly shrinking civic space. Over the past four years, Georgian CSOs consistently raised concerns about attacks on journalists and media independence, which escalated with the government's introduction of the draft Law on the Registration of Foreign Agents and the passing of the Law on Transparency of Foreign Influence. These developments prompted CSOs to come together through the OGP MSF, forming a united front with a clear, shared message. **According to Georgian CSOs, the OGP platform became the only way for CSOs to directly connect with someone inside the government.**

Sensing the government's desire to remain part of OGP, Georgian CSOs used the platform's rules to their advantage, reminding the government that the action plan could only move forward with civil society's approval. Without it, Georgia risked being marked inactive in the partnership. While CSOs pushed for ambitious commitments, it eventually became clear that their efforts wouldn't yield significant results. A month before Georgia was set to be marked inactive, CSOs reluctantly agreed to the government-drafted action plan. However, they made it very clear to both the government and the international community that this decision was purely to keep Georgia from losing its OGP membership status.

Amid growing concerns about democratic backsliding and shrinking civic space, Georgian CSOs also activated OGP's Response Policy, bringing international attention to their struggles. As a result, the OGP Steering Committee recently [suspended](#) Georgia's membership—the second time this measure has ever been applied, following Azerbaijan. This suspension came after Georgia failed to meet the deadline to address key recommendations issued as part of the Response Policy's initial phase.

“

In the last two years, all the forum member CSOs were very clearly saying that we no longer have a contact person in the government administration. The OGP process was definitely the last avenue, and now it's all over, because now, even OGP doesn't have a contact person in the government.

—Civil Society Member, Georgia

”



As mentioned above, the quality of dialogue between civil society and government improved in Armenia, Moldova and Ukraine during the program. But the EaP Programme also aimed to increase the number of CSOs in developing and implementing OGP action plans, and in ensuring they were working on reforms in corruption-prone areas. Over the course of the EaP programme, a total of 254 CSOs were engaged across the four EaP member countries in various stages of the action plan process - with an increase of 123 in Armenia, 17 in Georgia, 5 in the Republic of Moldova, and 14 in Ukraine from the beginning to the end of Year 3 of the EaP Programme. **Through the EaP Programme, 18 out of 19 CSOs were also first-time grantees in the EaP countries, not having been directly funded by OGP before. It allowed OGP to increase the density of actors in the EaP countries, most predominantly in Armenia.**

The growth in numbers of CSOs in Armenia comes from an infusion of support from the EaP programme. Through the program a strong consortium of CSOs in Armenia received a grant specifically to enhance the during action plan design, engage in wide-scale awareness-raising and convene town halls and public-private dialogues across the country. This grant, a more robust methodology deployed for the first time for action plan design, and the appointment of a consultant (who was well-versed in both national and local engagement of CSOs) to support the Armenian government PoC resulted in the significant growth of CSOs in the OGP process. What remains to be seen is whether in the absence of such a support for the next co-creation round, the engagement numbers can be sustained, or will drop back to regular levels.



IMPLICIT AND INTANGIBLE OUTCOMES

Over the course of the EaP Programme, four EaP community dialogues were held, bringing together government and civil society reformers from across the region. **Although peer exchanges are a consistent feature of the OGP platform, the EaP Programme’s value add was crucial in enabling more frequent opportunities across countries to network, exchange experiences and grow expertise in specific subject matters.** Over 80 percent of participants [mentioned](#) that the dialogue met or exceeded their expectations. The end of Phase II of the EaP Programme will be a good opportunity to assess the long-term effect of these exchanges on the region's performance, as these dialogues will likely not be sustained in the absence of an EaP Programme.



UNEXPECTED OUTCOMES

The EaP Programme began in 2020 and was conceived before significant geopolitical challenges arose - including Russia’s war against Ukraine in early 2022, and dramatic declines in civic space in Georgia starting 2021. **These developments disrupted the program’s core assumption** - which was to support the demand side by ‘creating an enabling environment for a wide range of stakeholders to engage with governments to inform and participate in the decision-making process’.

At the same time, new political opportunities emerged, including the push for EU integration in Ukraine, Moldova, and Georgia, as well as renewed political engagement in Armenia. **The OGP Support Unit had to quickly adapt, strategically reallocating resources to make the most of the shifting landscape. This flexibility led to some unexpected but promising outcomes—outcomes that weren’t part of the original program design but could have a big impact on Phase II of the EaP Programme.**



Ambition in Action Plans

Both Armenia and Ukraine showed an **improvement in ambition of their action plans** - from its fourth to fifth action plan, and fifth to sixth action plans respectively. Armenia had five promising commitments on beneficial ownership, justice, civic participation and budgets. Ukraine had four promising commitments and three that had substantial potential for results - focused on the transparency of, and participation in, restoration processes, harmonization with European Union (EU) legislation, and restoring access to information. Both Armenia and Ukraine’s plans incorporated legislative changes which contributed to their ambition. While Armenia’s progress reflects its long trajectory of OGP membership, including incorporating IRM recommendations to improve the ambition of its action plan, Ukraine’s EU integration process heavily influenced its action plan, following the granting of EU candidate status in June 2022.

Because of the four year gap between Moldova’s fourth and fifth action plan (2023-25), the IRM couldn’t assess improvement in ambition. However, the plan includes commitments that follow or expand policy areas covered in previous action plans, such as access to information, public participation, anti-corruption, and public procurement. Moldova too, opened EU accession talks in December 2023, which energized its progress in these areas. Although nascent, government stakeholders in Moldova anticipate that by the next action plan, the Parliament and Judiciary will be involved in OGP and that efforts by Moldova’s OGP ministerial point of contact - the governmental State Secretary - to engage them are currently underway.



Scaling Local Open Government

Across Armenia, Moldova and Ukraine, OGP government and civil society **stakeholders interviewed unanimously acknowledged OGP’s contribution in scaling local open government, although this is an area where funders like USAID and UNDP are also influential players and cooperated very closely with OGP.** Although local government engagement was not part of the original actions anticipated in the EaP programme, the standalone OGP Local program attracted an increasing number of municipalities from the EaP countries - seven Ukrainian, six Georgian, five Armenian and two Moldovan locals joined OGP Local from 2020 to 2024 - making the region one of the strongest performing ones in OGP in terms of local engagement. The region’s four countries make up a little over five percent of OGP’s national members, but the 19 local members make up more than twice that ratio among local members.

The Local program was also an opportunity to diversify OGP’s strategy in Georgia, given the absence of the national action plan as a lever for reforms. The EaP Programme resources were directed towards supporting Georgian [youth](#) to engage in the local co-creation process, and to organize a tailor-made co-creation workshop for Georgian locals. The EaP Programme also funded CSO’s to monitor Armenian local action plan commitments, and to develop an e-learning module for OGP Local members in Armenia, Georgia and Ukraine.

Moldova’s State Chancellery involved local governments in capacity building programs on access to information and are also developing an online course on open government to promote more collaboration between civil servants at the State and local levels. The government and the Council of Europe (CoE) also held events with local authorities on the possibilities of engaging in the national OGP action plan and in the OGP Local program. Ukraine’s participation in the national OGP platform led the Secretariat of the Cabinet of Ministers of Ukraine to conduct promotional events on open government and OGP. Local governments interested in learning more subsequently joined the OGP Local program and were connected with national counterparts on specific topics. For example, the OGP platform was used to connect the Ministry of Digital Transformation and local OGP municipalities to discuss open data reforms in Ukraine. Language barriers are a significant challenge for local municipalities in Ukraine, preventing them from participating in the domestic and international platforms held in English. The EaP programmes resources were used to translate OGP documents and events into Ukrainian to facilitate their understanding of OGP processes.

“



One of the biggest contributions of OGP is active outreach towards the regions, locals and communities. It considerably increased the awareness and participation of local governments, stakeholders, and citizens. Generally the commitments are designed by the national bodies - leaving the regional representatives behind and not informing them of the philosophy and the principles of all these commitments. The regional bodies become mere implementers of top-down commitments.

— Ani Harutyunyan, Consultant to the government PoC, Armenia

”

EXTERNALITIES

Externalities, in this context, refer to unexpected outcomes caused by the EaP Programme that don't directly impact OGP programs or stakeholders. **One positive externality has been the program's role in helping secure sustainable funding for individual reformers and CSOs beyond its duration.** In Armenia for example, the Armenian Center for Socio-Economic Studies (ACSES) noted that EaP Programme funding acted like venture capital investment into their organization, and the results achieved by the project provided visibility with donors like USAID who will fund ACSES to continue the work with line ministries. OGP staff have also been advocating USAID Armenia to provide more comprehensive USAID support to OGP processes throughout the action plan cycle. As a harbinger, Counterpart (a USAID implementing partner) co-funded one of the EaP Community Dialogues and have also included support for OGP co-creation in their 2025 action plan. In a context where the majority of funding for civil society in Armenia is reliant on international donors, financial sustainability is a point of vulnerability for many and these developments are seen in a positive light by many stakeholders. However, some also noted that this funding landscape can potentially lead to more competition rather than collaboration among CSOs.

USAID's [Pro-Integrity project](#) in Ukraine includes advancing OGP in its strategic actions and was partly a result of OGP's alliance-building work in Ukraine funded by the EaP Programme, and partly influenced by OGP's memorandum with USAID. OGP also helped identify Ukrainian reformers not covered by EaP Programme funding, and facilitated donor support from USAID and the Council of Europe to fund their participation at the OGP Summit in Estonia. Additionally, when OGP staff anticipated a gap in funding for a Ukrainian consultant between Phases I and II of the EaP programme, they facilitated support from the Renaissance (Soros) Foundation in Ukraine. In Moldova, OGP requested USAID to fund the participation of a government official at the EaP Community Dialogue in Armenia. USAID Moldova funded a government official from the State Chancellery in Moldova to attend the EaP community dialogue in Armenia. The CoE also financially supported local governments to apply to OGP's Local program.

These examples highlight OGP's impact on the funding landscape in two key ways: either by helping funders identify government and CSO reformers who needed support beyond the EaP Programme, or by amplifying the results of its grantee projects, sparking donor interest and paving the way for continued funding.

“



Our organization is relatively new... OGP believed in our team. The results we achieved can be showcased to other countries and donors to demonstrate how with a relatively small budget we can get very large results.

— Haykaz Fanyan, ACSES, Armenia

”

PROGRAMMATIC IMPLICATIONS

The real value of the outcomes achieved lies in how sustainable and adaptable they are, with the potential to deliver long-term benefits for the EaP region and beyond. Can OGP sustain the outcomes in the EaP region through its work in Phase II of the EaP Programme? And can the strategies used in the EaP region be adapted to other countries in OGP?

The answers to these questions depend on a range of external factors such as political context, leadership or stakeholder commitment - as well as internal factors such as financial and human resources dedicated to the region through the EaP Programme, and strategic interventions made by OGP staff. For the purposes of programmatic learning, the report looks at a few of the internal factors which are within OGP's 'sphere of influence'.



Sustainability of Outcomes in the EaP region

How OGP leverages Phase II of the EaP Programme in consolidating or expanding the early successes matters - particularly with regards to mainstreaming open government and building an ecosystem of reformers that can sustain beyond the life of an EaP programme.

Influencing systemic change in Armenia: Armenia stands out in this report as a country that has received comprehensive support throughout the policy cycle, from development to implementation and monitoring. Civil society in Armenia had also been empowered through a vibrant donor community, including being resourced through OGP - World Bank Multi-Donor Trust Fund (MDTF) prior to the EaP programme.

With its small population, it creates an interesting case study on whether OGP can influence the implicit conditions for [systems-level change](#) rather than just the explicit conditions. In other words, will OGP be able to go beyond affecting policies, practices and resources (explicit conditions) to influencing deeper shifts in power dynamics, relationships and behaviors around opening government (implicit conditions)?

As Phase II of the EaP Programme reallocates more resources to other countries in the region, support for civil society in Armenia will be scaled back. However, the OGP Support Unit is helping Armenia establish a Participatory Governance Unit within the Prime Minister's Office. This initiative aims to institutionalize open government practices and sustain the positive reforms highlighted in this report. Meanwhile, donors are stepping in to provide increased support in areas where OGP is scaling back.

Armenia has the potential to become a testing ground for OGP's new strategy, showcasing its ability to influence systemic change over the long term.

Surgical support in Ukraine: With a crowded donor landscape in Ukraine, OGP's approach under the EaP Programme took a more targeted and surgical approach. Stakeholders highlighted OGP's unique value in amplifying and providing global visibility to anti-corruption reforms, such as ultimate beneficial ownership (UBO), rather than directly facilitating their implementation.

For instance, the EaP Programme spotlighted Ukraine at the OGP Global Summit in Estonia, featuring over 20 Ukrainian speakers, a dedicated session in the main program, videos, and a high-profile reception focused on Ukraine. These efforts have helped integrate Ukrainian reformers into the global OGP community, fostering the exchange of best practices and learning.

At the national level, the OGP platform has facilitated better internal coordination among ministries involved in the action plan process. It has also broadened co-creation efforts to include a wider range of stakeholders beyond the elite CSOs traditionally focused on anti-corruption.

Phase II of the EaP Programme will build on this work by continuing to engage a broader set of stakeholders. For example, the Secretariat of the Cabinet of Ministries, responsible for civil society strategy and implementation, will be encouraged to submit a Challenge Commitment. Additionally, the program aims to engage local actors beyond OGP local members, with the goal of embedding open government principles across more branches and levels of government.

Emerging change in Moldova: OGP successfully tapped into the momentum generated by Moldova's push for EU accession. However, the recent razor-thin election win for the democratic, EU-oriented government puts pressure on stakeholders to secure the still-developing open government victories and maintain a progressive agenda.

The EaP Programme enabled OGP to act quickly in response to Moldova's emerging needs, transforming what had been a dormant process focused only on open data into a respected initiative valued by both government and civil society. This revitalized effort has also sparked interest in open government across more branches of government.

Phase II of the EaP Programme will focus on consolidating these gains by strengthening the capacity of domestic reformers to continue their efforts. It will also expand the reach of open government principles by engaging more actors at the local level and introducing Parliament to the practices and benefits of open government.



One of the biggest lessons in determining whether the strategies used in the EaP region can work elsewhere is how the SU team, supported by the EaP Programme, **successfully matched in-country demand for open government with the right supply of resources, capacity, and guidance at just the right time.**

The EaP Programme allowed SU staff to focus their attention on four countries, enabling them to be agile and responsive to the unique needs of reformers. This led to not only tangible financial support for reformers and their initiatives but also the intangible benefits of building lasting relationships and alliances among reformers.

The speed and intensity with which these outcomes were achieved provide a strong proof of concept for OGP’s “advanced support” model—showing how focused and timely assistance can drive meaningful change.

Staff-Countries Ratio: The EaP Programme was designed to provide ‘advanced’ support to the EaP countries - a set of services that go beyond what a baseline membership offers to OGP countries. From the perspective of human and financial resources, that translated to a 1:1 staff to countries ratio and resourcing from the EaP Programme for four years. While exact comparisons with universal support are out of scope here, a few considerations below may be interesting (acknowledging the hugely varying country contexts and needs):

- **By region:** Europe (30 countries), Americas (17 countries), Africa (15 countries) and Asia Pacific (10 countries) have three or less country support staff dedicated to the countries.
- **By grants:** Grants similar to the EaP Programme such as INTPA and FCDO charge staff salaries to the grants and cover 11 focus countries between them. This leads to a rough calculation of 5 equivalent full-time staff for INTPA and 10 equivalent full-time staff for FCDO - which means roughly 1:1 staff per country as well, similar to the EaP Programme. However, INTPA and FCDO are still different forms of support than the EaP programme which has a full-time team of three supporting the EaP region. This brings with it specializations in the region, consistent relationships and follow-through in the EaP countries that may look very different in the INTPA and FCDO countries. Admittedly, it also adds an administrative burden on the EaP staff as tasks of managing events, communications, grants, consultants, contracts, budgets and reporting are all ‘in-sourced’ to the EaP staff.
- **By activities:** Programmatically, for the first two quarters of this year, the EaP staff logged an average of 11 activities per EaP country. For all other countries, the activities averaged less than two per country. This is a back-of-the-envelope calculation to get a sense of the frequency and intensity of activities that took place in the EaP region as part of ‘advanced support’. If Phase II of the EaP Programme continues to demonstrate strong outcomes, it would confirm the hypothesis that advanced support reaps long term dividends for OGP countries.

To more fully understand whether the Support Unit’s ‘advanced’ support makes a difference, one approach could be to do cost-efficiency analysis on the average staff time, activities and funding dedicated to a few countries in the partnership which have similar characteristics to the EaP countries.

Surge Capacity for PoCs: A defining feature of the EaP Programme was adding surge capacity for government Points of Contact (PoC) by funding ‘PoC consultants’. In Armenia, Ukraine and Moldova, the EaP Programme supported consultancy subcontracts - extending to almost two years in Armenia and Ukraine. These consultants were tasked with supporting the PoC with all things related to the OGP process on action plan co-creation and implementation planning. PoCs interviewed for this exercise noted the critical role these consultants played in coordinating and convening actors across government and civil society. It allowed them to maintain strong relationships between government and civil society actors and to reach wider, more diverse stakeholders in the action plan development process. If OGP or other donors continue to support these consultants, it could prove to be a worthwhile investment for country-level results.

Resourcing Civil Society across the AP cycle: OGP has had a long history of supporting civil society through mini-grants. One [internal study](#) showed that the OGP Secretariat spent around USD 360K in mini-grants to civil society over the course of 2018-2021. However, the small size of most of these grants meant that OGP did not require progress reports, and as such we know little about the outcomes of these grants. In comparison, the EaP Programme disbursed roughly USD 280K during that same period for just the EaP region - with targeted support for co-creation and implementation phases of the action plan, as well as some experimental innovation grants. Given how strained the funding landscape is for civil society in the governance field, and growing calls for localization - OGP’s role in securing resources for civil society becomes paramount. The outcomes of the EaP Programme alone can stand to make a strong case for resourcing local CSOs.

METHODS

Following the completion of Phase I of the EaP Programme, the Support Unit analyzed the outcomes achieved, and the contribution of key stakeholders to those outcomes.

SCOPE

What this is

- The primary audience for the learning exercises and subsequent report are the Support Unit and IRM team. They can be used as a reflection on the impact of interventions in the EaP region, and inform the design and programming of support to OGP countries going forward. The secondary audience are existing and prospective funders, provided lessons from this report can be used as a fundraising tool to advocate for more resourcing in priority countries.
- An investigation of expected outcomes and the positive and negative externalities from Phase I, validated and prioritized by key EaP stakeholders from government, civil society and partners
- The contribution of the Support Unit and IRM to achieving the outcomes, validated by key stakeholders from EaP government, civil society and partners

What this is not

- An activities level report whose primary audience is DG NEAR
- A summary of IRM reports and recommendations for the EaP region on outcomes achieved
- An assessment of the impact of reforms implemented in the EaP countries at the completion of Phase I

LEARNING QUESTIONS

1 What were the direct and indirect outcomes observed at the end of Phase I and to what extent did they materialize?

Sub-questions

- Are there differences in the direct and formal changes on co-creation, ambition and completion in country action plans pre-and-post DG NEAR grant? Are these differences significant?
- Does the EaP region demonstrate a whole-of-government approach to open government through its national and local efforts to reform? To what extent has the DG NEAR grant enabled scaling local open government?
- Did the OGP platform succeed in grounding influential global/regional anti-corruption reform agendas (OECD, EU) in domestic action? Or in harmonizing/linking open government across agendas (e.g. S4D, GRECO, SDGs, UNCAC, IACC)
- What indirect outcomes in terms of mainstreaming open government (demonstration effect or institutional/policy isomorphic effect, power and influence of actors, growth in density and diversity of actors, coalition building) were observed, if any? Is there a regional coherence of those outcomes or are they mostly observed in the individualized context of each country?

2 What is the contribution of the Support Unit and IRM to the direct and indirect outcomes observed above?

Sub questions

- What is the biggest value add of the OGP platform to government/civil servants and CSOs in the EaP region?
- What is the relative contribution of the Support Unit and IRM products and services (skills, resources, global visibility and incentives and political opportunities) enabled by the EU For Integrity Action?
- Was the Support Unit able to generate innovative solutions or opportunities in the EaP countries as a result of the EU For Integrity Action? Were new ideas tested in the EaP region relative to the rest of the partnership? If yes, what have been the outcomes of these innovations? Have they led to increased density and diversity of open gov community or spreading norms in these countries? Have they strengthened the OGP platform, and if yes, how? Could we replicate these elsewhere in the partnership?
- To what extent did the surge support (both financially and through staff and consultant capacity) facilitate the observed outcomes in the EaP countries? Are these outcomes sustainable even in the absence of the EU For Integrity Action (i.e. transfer of skills, capacity or knowledge)?

ANALYSIS

To answer # 1

An adaptation of the RAPID outcome assessment (ROA) method was used to assess and map changes in policy or the policy environment. This includes:

- Review of project documents, IRM and other research and evidence documenting direct and indirect changes observed in the EaP countries
- Assessing change in behaviors, actions and relationships - changes often called the “missing middle” or “black box” of outcomes that occur immediately from program activities but precede the longer-term, more transformative policy change
- Mapping outcomes, and generating a hierarchy by surfacing the most salient outcomes, from the perspective of key stakeholders

To answer # 2

An adaptation of Contribution Analysis: A method that allows us to state - within some level of confidence - that the program has made an important “contribution” to the observed outcomes. This method is useful for situations when there may be many contributing factors/actors to an observed outcome.

During the EaP community dialogue in Yerevan, Armenia on June 4-8, 2024, several focus group discussions with government PoCs and CSOs were held, and were then followed up with 1-1 interviews. Otter.ai was used to transcribe all interviews. Atlas.ti was used to organize, cluster and code the outcomes and contribution levels.

The table [here](#) used the results from Atlas.ti to develop an understanding of

- Which of the outcomes materialized, and whether they are validated by stakeholders, supported by documentary evidence, or both.
- The level of contribution of the EaP programme

FULL LIST OF INTERVIEWEES

Armenia

- Lilya Afrikyan, OGP government PoC, Office of the Prime Minister of the Republic of Armenia
- Ani Harutyunyan, Consultant to PoC of Armenia
- Mariam Zadoyan, Armenian Lawyers' Association
- Sona Ayyazyan, Transparency International Anticorruption Center (TIAC)
- Anna Sarkissyan, Public Assembly NGO
- Haykaz Fanyan, Armenian Center for Socio-Economic Studies

Moldova

- Nicolae Panfil, PromoLex
- Constantin Ciaranovski, Initiativa Pozitiva
- Natalia Postica, State Chancellery
- Olga Diaconu, AGER

Ukraine

- Oleksii Kovalenko, Civil Society Development Forum NGO
- Olesia Arkhypska, OGP Coordinating Council in Ukraine
- Oleksiy Orlovsky, International Renaissance Foundation
- Nataliia Oksha, OGP government PoC, Secretariat of the Cabinet of Ministers of Ukraine
- Anna Pakhno, Consultant to PoC of Ukraine
- Natalia Chernogub, YouControl
- Veronika Borysenko, Transparency International Ukraine

Georgia

- Sandro Kevkhishvili, Transparency International Georgia
- Giorgi Kldiashvili, Institute for Development of Freedom of Information (IDFI)

Others

- Tatevik Margaryan, IRM Researcher for Armenia and Moldova