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Gearing up for the 2013 EEAS Review

Opportunities, challenges, and possible approaches

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About this paper

This Briefing Note explores the political and technical challenges of the upcoming review of the European External Action Service (EEAS), scheduled for 2013, and looks at how it could seize this opportunity to increase the legitimacy of the EEAS by promoting learning and accountability. By drawing on relevant experiences in conducting evaluations, this Note presents options and particular challenges that may be faced in the review process. Section 1 examines the context and legal basis for the review. Section 2 further frames the review according to common challenges identified for the EEAS and obstacles facing reviews and evaluations of this nature. Section 3 offers several possible analytical approaches for the review, alongside brief analyses of their practical and political feasibility and examples. Section 4 closes with some concluding remarks and recommendations for improving the rigour and hence legitimacy, credibility and usefulness of the review in promoting accountability and learning.

The EEAS review in context

The establishment of the European External Action Service (EEAS) in 2010 completes the new foreign policy arrangement introduced by the Lisbon Treaty.² In the run-up to its establishment, certain questions on the role and functioning of the EEAS remained unanswered, leaving doubts as to its ability to deliver on the promise of coherent, efficient and visible EU foreign policy³.

The current context makes it urgent for the EEAS to demonstrate its added value for EU foreign policy towards the Member States and EU citizens. The Council Decision⁴ establishing the organisation and functioning of the EEAS includes a provision for a review of the nascent service, to be presented by the High Representative by mid-2013. It is at this point unclear what the exact focus of the review will be, who exactly will conduct the review and how, or what the consequences could be.

The review may lead to amendments to the Council Decision establishing the EEAS. In view of this, a wide range of EU stakeholders, extending from EU Member States and the EU institutions to civil society, will seek to influence the review process. As such the process will be predominantly political rather than technical in nature, and there is likely to be a deluge of opinions and papers from experts, lobby groups and commentators. In addition, any review of the EEAS enters into a wider framework of perspectives on the success or relevance of European external action on the global stage.

¹ The authors are grateful for feedback received from Niels Keijzer, Laura Mayer, Nicola Tissi, Jean Bossuyt, Geert Laporte, James Mackie, Jeske van Seters, Volker Hauck and Paul Engel yet any errors remain those of the authors.

² See Seters and Klavert (2011) for more details on the post-Lisbon arrangements for EU external action

³ Driesken and van Schaik, 2010

⁴ Council of the European Union, 2010a.

Insofar as these opinions on the EEAS continue to be based on normative positions or interests rather than evidence-based analysis, the stakeholders involved in the process could stand to draw on insights from the practice of conducting reviews, evaluations and audits. In doing so, they would seize the 2013 review as an opportunity to enhance the credibility and legitimacy of the EEAS by promoting both learning and accountability. Some may contend that nothing can be learned from past approaches for assessing the 'most unique of beasts', the EEAS. Such retrograde thinking should be challenged: the existence of the EEAS can only be legitimised by the added value it can be seen to deliver. This Briefing Note draws on the knowledge and experience of past evaluations and reviews and suggests approaches as to how the EEAS review could best be conducted with this in mind.

1.1. The mandate for the EEAS 2013 review

The EEAS was designed to support the High Representative in her mandate to conduct EU foreign policy, externally represent the EU and coordinate other aspects of EU external action. In addition, the EEAS is mandated to support and cooperate with the Member States' diplomatic services, the General Secretariat of the Council and the Commission services to ensure consistency between the different areas of the Union's external action and between those areas and other policies⁵.

The High Representative has remarked that the EEAS is not meant to speak with a single voice on foreign policy issues, but is instead designed to assist in delivering an integrated European message ('joined-up government')⁶. The EEAS thus aspires to be a single diplomatic presence, speaking 'on behalf of a single, globally active legal entity', and therefore a platform for European values and interests. Box 1 gives a brief summary of the legal basis of the EEAS.

Box 1: Legal basis of the EEAS

Article 27 (3) of the TEU provides the legal basis for the founding of the new service, denoting its specific goal as assisting the High Representative in realising his/her tasks (as noted in Articles 18 and 27 of the TEU):

- Contribute through proposals to the development of the CFSP and CSDP;
- Preside over the Foreign Affairs Council;
- Ensure implementation of the decisions adopted by the European Council and the Council;
- Represent the Union for matters relating to the CFSP;
- Conduct political dialogue with third parties on the Union's behalf;
- Express the Union's position in international organisations and international conferences;
- Ensure consistency of the Union's external action.

The Council Decision notes⁷ that the High Representative should prepare a report on the functioning of the service in its first year. Published on 22 December 2011, this report⁸ focussed on EEAS' progress towards the implementation of the immediate 'Lisbon tasks' of the new foreign policy configuration⁹. In practice, the 2011 report exceeded the requirements of the legal basis, partly in response to feedback from certain Member States on particular areas for improvement identified in a letter to the High Representative¹⁰. The report includes an analysis of the achievements of the EEAS against the political backdrop, foreign policy events and EU foreign policy strategic partnerships.

⁸ EEAS, 2011

⁵ This was in part driven by the European Parliament (EP), which strongly advocated for the EEAS to balance and align its intergovernmental and communitarian external relations roles, broadening its scope to include development cooperation and humanitarian aid to ensure both consistency and coherence of EU external action. Furthermore, the EP called for an adequate balance between Commission and Council staff in the EEAS, and greater accountability towards the EP.

⁶ Balfour, Bailes and Kenna, 2012

⁷ Article 13 (3)

⁹ e.g, setting up structures for providing instructions to the EU Delegations (Article 5 (3)), provide support through the EU Delegations to Member States' diplomatic relations and consular protection services for citizens of the EU in third countries (Article 5 (10)) and ensure political coordination of EU external action, including the programming and management cycle of external action instruments (Article 9).

Foreign Ministers of Belgium, Estonia, Finland, France, Germany, Italy, Latvia, Lithuania, Luxembourg, the Netherlands, Poland and Sweden, 2011

The legal basis for the upcoming 2013 review is provided elsewhere in the Council Decision¹¹, designating that "By mid-2013, the High Representative shall provide a review of the organisation and functioning of the EEAS, which will cover inter alia the implementation of Article 6(6), (8) and (11). The review shall, if necessary, be accompanied by appropriate proposals for the revision of this Decision. In that case, the Council shall, in accordance with Article 27(3) TEU, revise this Decision in the light of the review by the beginning of 2014." The cited articles refer to:

- Merit-based recruitment to ensure geographical and gender balance within the EEAS;
- Recruitment from Commission, the Council and the General Secretariat and Member States;
- Length of service period (eight years maximum) and post-service procedures and guarantees.

Based on the 2011 report, it is reasonable to expect the upcoming review to again exceed the legal text in scope - two arguments support this expectation. First, the Council Decision already makes reference elsewhere 12 to a formal requirement for the High Representative to submit an annual report to the European Parliament and the Council on occupation of posts (i.e. staffing provisions) of the EEAS. It is unlikely that the two provisions are intended to have identical outputs.

Second, as the Council Decision specifies that recommendations may be made for amending the 3 , the review is likely to seen as an invitation to produce a more comprehensive assessment 1 the EEAS that will not go unused. To a certain degree, the review provides the imperative for an assessment of (the implementation of) key aspects of the Lisbon Treaty.

1.2. Why review the EEAS?

Review or evaluations fundamentally have two objectives: to learn from experience and adjust strategies, operations and resources accordingly, and to be accountable towards key stakeholders. While it is not uncommon for complex organisations and institutions to undergo periodic reviews or evaluations, it is relevant to consider the question as to why a legal requirement was made to review the EEAS at this point, a mere two years into its operation, in which space was created to alter the legal basis of the EEAS.

It is most likely too soon to thoroughly evaluate the sustainable impact the EEAS has had - there is however an urgent need for the service to account for progress made and actively learn from the past two vears' experience. The regulation for a review of the EEAS could reflect the doubts about the new EU foreign policy arrangements in which the EEAS is seen as challenge to the sovereignty of national foreign policy. The review represents an opportunity for Member States and other stakeholders to renegotiate these arrangements.

Certainly it seems that Member States and the European Parliament were eager to introduce an opportunity for change within the first few years - the original proposal of the High Representative for the establishment of the EEAS in 2009 had the review taking place in 2014. 15 It is also possible that the timing of the review is designed to fall within the term of office of the High Representative, which runs from December 2009 to December 2014.

In addition, several Commission Directorates have gradually developed a more routine practice of evaluation for policy and programme implementation over the past decades, even in typically political or institutional areas of EU external action. This serves the dual purpose of demonstrating accountability and developing and assimilating learning, both of which are critical for credibility. This practice is currently strongest in the Directorates-General for Development Cooperation (DG DEVCO) and Humanitarian Aid and Civil Protection (DG ECHO)¹⁶, with regular evaluations taking place of annual or thematic operations,

¹¹ Recital 19 and Article 13 (3)

¹² Article 6 (9)

¹³ The High Representative in her speech to the European Parliament on 11 September 2012 affirmed this by referring to "our 2013 review of the EEAS Decision". Ashton, 2012

¹⁴ The word 'assessment' is used throughout the note for the sake of consistency as a catch-all terms for all forms of structured and unstructured analysis from which conclusions, opinions or recommendations are drawn.

¹⁵ Council of the European Union, 2010c

 $^{^{16}}$ See $\underline{\text{http://ec.europa.eu/europeaid/how/evaluation/evaluation_reports/index_en.htm}$ and http://ec.europa.eu/echo/evaluation/thematic en.htm.

as well as inter-institutional partnerships and programmes.¹⁷ While ECHO conducts its own evaluations, the former DG EuropeAid Co-Operation Office (AidCO) housed a Joint Evaluation Unit for the entire External Relations 'family' of European Commissioners and centralised the management of independent evaluations.

A review of external evaluations commissioned by the Joint Evaluation Unit was finalised in July 2011 and concluded that most of these evaluations focused on development cooperation interventions. It is clear that this evaluatory practice also relates to the external action work relevant to the EEAS: the past year have seen the finalisation of comprehensive EC thematic evaluations on the visibility of EU external action, EC support to conflict prevention and peace building, respect for human rights and fundamental freedoms, and justice and security sector reform.¹⁸

Nevertheless, the practice of evaluations has up until now not been routinely applied to EU institutions themselves – DG ECHO is so far the only other service to have an article in its regulation referring to an "overall assessment" of its operations, from which proposals for amendments to the Regulation would be derived 19, and to have subsequently undergone (external) evaluations in 1999 and 2006. Similarly, it is rare for Member States to conduct evaluations covering entire ministries or institutions 20, partly due to the difficulty of controlling for or isolating the interplay of the political and administrative aspects which determine the performance of a service.

The short timespan since the setting up of the service to be covered by the review offers an indication that the review will in any case not be able to credibly assess the impact of the EEAS as such, but will rather assess the EEAS' current positioning for impact a few years further on and may focus on the service's key institutional developments, interventions and outputs. Political motivations can therefore be presumed to be behind and at the core of the review. The decision to schedule a comprehensive review at such an early stage, and the likelihood of a broad focus for the review would suggest that it is in the stakeholders' interest to assess, justify and (if necessary) modify the Council Decision establishing the EEAS. Indeed, few would dispute the need for assessing the progress of a new service. Clearly it is of benefit to respond to the rising demands for public scrutiny of the EU, and to showcase the added value of not only a new EU institution but also the much-contested Lisbon Treaty as a whole.

1.3. Who will review the EEAS?

The legal basis of the review stipulates that the High Representative should provide the review (though not that she should necessarily conduct it). Given the potential scope and implications of this review, the EEAS Corporate Board and the High Representative's Cabinet are likely to retain a strong hold on the planning, structuring and (particularly) the drafting of the report including any findings, conclusions and recommendations of the review. Though the EEAS does not have its own evaluations unit, the 2011 report was produced internally and there is as of yet little indication that the review will be conducted differently.

In parallel, it is fair to assume the Member States' Foreign Affairs Ministries are or will be conducting their respective internal 'reviews' of the EEAS. Whether Member States will advocate for certain elements and requirements to be included in the EEAS review, or will present their parallel assessments publically (either individually or in groups) remains to be seen. Various configurations of Member States have previously

²³ ibid

¹⁷ The European Parliament also regularly commissions studies and reviews of specific policy and thematic areas. However, these are not formal evaluations in the sense of the Commission's mandate. Other Directorate Generals who undertake regular evaluations include the Directorate Generals for Agriculture; Employment, Social Affairs and Inclusion; Enlargement and Trade, although all DGs produce an Annual Report.

¹⁸ European Commission, 2011a, 2011b, 2011c and 2012

¹⁹ Article 20 of Council of the European Union, 2006

Most Member States' Foreign Ministries or development agencies mainly have experience evaluating particular policies or programmes. The UK is a notable exception, having developed and applied the Capability Review model to the UK Civil Service as a whole since 2005.

David O'Sullivan, Chief Operating Officer of the EEAS, has noted that the EEAS is a "5 to 10 to 15 year project where the challenge will be to build a professional diplomatic service, which can deliver to the extent that Member States wish to choose to have common positions and objectives." IIEA, 2011

See http://www.parliament.uk/documents/lords-committees/eu-sub-com-c/EEAS/EEAScallforevidence1.pdf, as well as Foreign Ministers of Belgium, Estonia, Finland, France, Germany, Italy, Latvia, Lithuania, Luxembourg, the Netherlands, Poland and Sweden, 2011; Future of Europe Group, 2012.

given inputs and suggestions for improving the functioning of the EEAS. The processes through which they derived their findings and recommendations are however opaque, limiting their credibility and leaving them open to accusations of being purely political agendas.

The legal basis does not specify a role for the European Parliament in the review, though its legislative and budgetary functions are referred to elsewhere in the Council Decision. Furthermore, the EEAS' budget is decided through the ordinary legislative procedure, meaning that the EP and Member States have to reach consensus on the decisions regarding the functioning of the EEAS. The finalised review is likely to be presented to and commented on by the Parliament, who will also choose to assess the progress of the EEAS on their own terms, given the EP's political importance in developing the Council Decision.

The review also comes amid a stream of opinions from external observers and stakeholders who will try to influence the scope, content and outcome of the review process. These stakeholders are, however, unlikely to be formally involved in the process beyond incidental consulting assignments or informal advice. The review process can be illustrated along an estimated timeline, as in Figure 1:

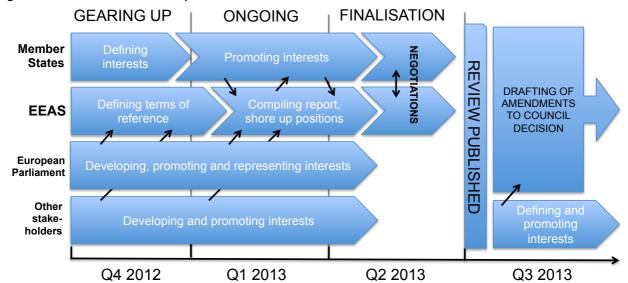


Figure 1: Estimated timeline and process of the review

2. Framing the review

The extent to which the review will genuinely allow stakeholders a chance to directly influence the shape and direction of the EEAS, or whether the review will be a 'paper exercise', foregoing any change in the course of the EEAS until there is change in leadership or the College of Commissioners as a whole is up for debate.

The challenge for the High Representative, her Cabinet and the EEAS Corporate Board²⁴ is therefore twofold: first to elaborate and propose a politically satisfactory scope for the review, which, second, has a credible methodology that seizes the opportunity for learning and accountability. On the first point, while the EEAS is to some degree obligated to be inclusive, **careful consideration will have to be given as to the role and involvement of major stakeholders** whose own views are likely to affect the review. The Corporate Board has the initiative as to where it strikes the balance between actively driving the review agenda and reflecting the current political context.

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²⁴ The Cabinet is currently composed of 10 members and advisors, while the Corporate Board is composed of Pierre Vimont (Executive Secretary General), David O'Sullivan (Chief Operating Officer), Helga Schmid (Deputy Secretary-General for Political Affairs) and Maciej Popowski (Deputy Secretary-General for Inter-institutional Affairs).

As to the second point, the review will have to be designed in such a way as to clearly assess the EEAS' functioning and distinguish its contribution to EU foreign policy and external action. This is however complicated by the structure and functioning of the EEAS along the lines of a 'comprehensive approach' of involving all relevant stakeholders in the decision-making processes to enhance coherence and effectiveness of EU external actions.²⁵ Given this approach, the report can be expected to shy away from concretely analysing the role of EU Member States in its performance – this is in part due to the fact that only two years of operation are covered, yet mostly due to the politics surrounding this.

In order to manage expectations, the Corporate Board and the High Representative's Cabinet could seek to provide clarity by **developing and communicating a clear 'terms of reference' for the review**, agreeing what is covered and how it will be conducted. Alternatively, given that the issues touched upon by the review are bound to be contentious, they may seek to keep things close to their chest. Whatever the approach for the upcoming review, stakeholders could draw inspiration from existing publications looking at the EEAS' performance, as elaborated below.

2.1. Challenges identified in existing publications

Observers and commentators have not been waiting with baited breath for the review before offering their analysis. Over the course of the first two years of operation of the nascent service, the number of opinions on the EEAS published has increased markedly. Such assessments originate from a wide range of perspectives, concentrating in varying degrees on the EEAS' structure, functioning and achievements in order to derive and underscore strengths, weaknesses and recommendations for its future²⁶. The challenges identified though strongly inter-related, can broadly be classified as: 1) strategic challenges of leadership and agenda-setting; 2) tactical challenges of ensuring the buy-in of stakeholders; 3) operational challenges linked to the institutional and operational capacity of the EEAS; and 4) challenges of delivering outputs coherently and consistently.

First, while the European Security Strategy (ESS) provides some guidance for the course of EU foreign policy, it does not contain concrete EU foreign policy positions or actions – as such, it cannot be considered a fully-fledged foreign policy or diplomatic strategy. Meanwhile, foreign policy agendas have significantly globalised over the past years leaving many to challenge the continuing relevance of the ESS as a point of departure. The EEAS is therefore challenged to articulate a clear and timely vision, matched by an integrated and comprehensive strategy with clear priorities for EU foreign policy. Subsequently, the EEAS will have to coordinate positions and develop concrete policy measures in response to international issues before it can effectively project itself as a major, entrepreneurial player in the global arena. This will require a balancing of consensus building against ambition and desired impact throughout.²⁷

Second, the foreign policy configuration set out in the Lisbon Treaty envisions it as a positive-sum engagement, bringing together complementarity, subsidiarity and added value. These expectations need to be carefully managed going forward, tasking the EEAS first and foremost to clearly articulate its role and function (reflecting European values and principles) and develop working modalities with the Commission Directorates and MS Foreign Ministries. Notably, the EEAS needs to actively manage its multiple accountabilities. ²⁸

Third, in order to materialise the benefits of a single, continually involved EU foreign policy actor (in contrast to the rotating Presidencies) that cumulatively professionalises and increases its effectiveness, the EEAS will need to have the requisite 'critical mass' and geographical and gender balance to manage its workload. It's staff need comprehensive training programmes in key areas of foreign policy, and a common culture will need to be forged between staff originating from the Commission, Council and National

²⁸ See Lehne, 2011; Wessel and van Vooren, 2012; Kaczynski, 2011 and Comelli and Matarazzo, 2011.

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²⁵ The 'comprehensive approach' is a much publicized *raison d'être* for the EEAS, and has also been interchangeably called the integrated, joined-up or common approach. Despite a few attempts, including by the UK's Stabilisation Unit (http://www.stabilisationunit.gov.uk/attachments/article/523/ComprehensiveApproachCoreScript.pdf), there is up until now no accepted (methodological) definition of this concept.

Lehne, 2011; Duke, Pomorska and Vanhoonacker, 2012 and Blockmans, 2012 in particular provide comprehensive overviews of arguments arising from the literature.

See Balfour, Bailes and Kenna, 2012; Hemra, Raines and Whitman, 2011; Duke, 2012 and Lehne, 2011.

Seconded Experts. Clear feedback loops need to be developed with the EU Delegations, along with a clear chain of command based on delegation of tasks and trust-based management. ²⁹

Finally, to achieve consistency in EU external action, the EEAS will have to effectively coordinate and integrate discussions on both intergovernmental and community-driven policy areas, as well as develop and implement modalities to proactively ensure the coordination and consistency of external actions at the level of the EU Delegations.³⁰

These challenges, as identified by observers, as well as the degree to which these are interlinked, can serve to shape and inform the review, even if the document does not address them directly. As the challenges have widely varying timeframes, it is clear that **the review cannot effectively incorporate and address all challenges faced by the EEAS**. For instance, the 2011 report by the High Representative concentrates on operational issues (institutional or organisational capacity), while including notes on strategic policy-making processes and achieved outputs and largely overlooking the thorny political challenges in the EEAS' inter-institutional and EU Member States relations.

It is also worth underlining that most conclusions and recommendations for the EEAS derived from these publications are done so on a normative basis³¹. As the publications typically do not include a transparent description of the methodology used to collect the evidence on which to build their findings, many of these can best described as 'position papers' or 'opinion pieces', rather than comprehensive, structured assessments. While such outputs are not invalid, they are often based on a selective understanding of what the EEAS should be doing and how it is doing it, not a neutral assessment – this leaves ample room for such publications to be dismissed.

2.2. Obstacles for objective assessment

Despite the fact that the Council Decision specifically calls for a 'review', it is reasonable to assume based on past experience that the end product of the assessment may not be based on a clearly elaborated methodology, and may indeed contain elements of several forms of assessment. For instance, the 2011 report by the High Representative contains aspects of an evaluation. Box 2 provides an overview of the differences between relevant forms of assessment.

Even with a well-defined methodology, practical obstacles common to many reviews and evaluations present themselves for the EEAS review. Five obstacles in particular affect the design of the review.

First, as the EEAS is a *sui generis* institution in both form and function, **there is no direct baseline against which to compare functioning or performance**, other than the pre-Lisbon foreign policy configuration. Though each institution is to some degree unique, the EEAS is a 'unique breed' in that it combines functions of Foreign Ministries, Defence Ministries, networking or liaison organisations and Commission Directorates with both a supranational and intergovernmental flavour.

Second, while a great number of observers gave their critical analysis and input to the new institutional arrangements originating from the Lisbon Treaty, **no formal ex ante risk or impact assessment was conducted**. Coupled with the above point, there are therefore no clear terms of reference for the review. The 2011 report by the High Representative offers the closest reference point for this review, as will be discussed further below.

Third, the review will unfold in a complex, changing, multi-stakeholder environment, in which the EEAS has to respond to events on a day-to-day basis while stakeholders and participants will actively seek to influence the review process. As a result, the process may introduce changes to the structure and working arrangements of the EEAS before the review is completed and recommendations for changes to the Council Decision are drawn up. The object of the review is not static.

²⁹ See Hemra, Raines and Whitman, 2011; Wessel and van Vooren, 2012; Comelli and Matarazzo, 2011; Kaczynski, 2011 and Lehne, 2011.

³⁰ See Lehne, 2011 and Concord, 2012.

³¹ Of the publications informing section 2.1, the ECFR European Foreign Policy Scorecard is the only one to be based on a systematic multi-stakeholder methodology. See ECFR, 2012.

Fourth, the Lisbon Treaty and the legal texts related to the review remain open to a degree of interpretation; the object of the assessment is therefore open to ambiguity, which deters from learning and accountability. From assessments and position papers published thus far, it is clear that to observe and measure the performance of the EEAS one must be sensitive to the political currents and incentives driving the EU's foreign policy discussions. Matched to the other arguments above, it is likely that the political bargaining and agenda-setting process in the run-up to the review will in fact be part and parcel of the review.

Box 2: Overview of different forms of assessment

The Council Decision specifically calls for a 'review', which can be distinguished from other forms of assessment. Key forms of assessment (derived from OECD, 2002 and UNEG, 2005) can be distinguished as follows:

- A **review** considers the current performance of a particular process or initiative (activity, project, programme, strategy, policy, topic, theme etc.) and thereby (re)considers resource commitments, identifying immediate and future problems and developing appropriate solutions. Reviews generally focus on operational and resource issues, and can be compared to **checking the gauges of a car while driving**. Examples are the 2008 report on the implementation of the European Security Strategy (Council of the European Union, 2008) and the 2007 Audit Review of the African Union (AU, 2007).
- An **evaluation** systematically and objectively explores how and how well an on-going or completed process or initiative has been able to achieve its objectives, with the aim of incorporating the findings into current or future processes. Evaluations usually take place at multiple levels (political, social, economic etc.) and may involve the definition of particular standards against which performance is measured, but frequently refer to established criteria, such as those agreed by the OECD: relevance, effectiveness, efficiency, sustainability and impact. Evaluations are usually conducted along internally defined terms of reference by external parties with no direct interest in the outcome they can be compared to **taking the car to the garage for a check-up and tuning**. An example is the 2010 Assessment Study of the Africa Peace and Security Architecture (AU, 2010).
- An audit systematically assesses a (set of) procedure(s) against prior agreed, clearly measurable and internationally agreed standards in order to add value to the organisations' operations by ensuring effectiveness, whether in the area of compliance, adequacy, relevance or efficiency. Audits are comparable to taking the car for regular government-mandated vehicle inspections. Examples can be drawn from the UNEG Framework for Professional Peer Reviews (UNEG, 2011).

Each of these forms of assessment can be carried out both internally and externally, can come in various forms and are certainly not mutually exclusive - the terms may intersect and are in practice often interchanged.

Fifth and last, the complex institutional arrangement originating from the Lisbon Treaty, and the EEAS' position within that arrangement, makes it challenging to **identify the (extent to which) actions and results (were) affected by the EEAS** rather than by a) the High Representative, b) the inter-governmental dialogue process on foreign and security policy and c) (inter)actions with/of the Commission Directorates. The EEAS' ability to perform is not the result of its operation alone but rather of a range of trust- and interest-based relations and interactions. Crucially, a significant amount of time has been devoted to adjusting and giving shape to the post-Lisbon configuration in the past two years – these 'construction' efforts should be distinguished from 'actual' strategic and operational activities of the EEAS.

Many observers have noted that the EEAS (particularly its senior management) have been somewhat trapped between established 'powerhouses': the Commission and the Member States. It is debatable whether it is possible to genuinely review the EEAS without also assessing if its operating environment, shaped by its principal stakeholders and competitors, was sufficiently enabling. This also brings into question whether the EEAS should be judged on its capacity to lead actions or rather facilitate discussions on foreign policy and external action. Most importantly, the position of the EEAS within the post-Lisbon configuration makes it challenging to distinguish the design phase from the execution of the review.

While it is not immediately obvious how to resolve these obstacles, it would be a mistake to consider the review process as a foregone conclusion. It is a common issue for politicised assessments to judge institutions against 'moving goalposts'. While certain stakeholders may be eager to exploit the uncertainty surrounding the review process in order to promote particular interests, the EEAS review would in fact rapidly revert to a normative almost anecdotal interpretation of events if an attempt to consider and overcome these obstacles were not made.

Again, the obstacles noted above are not insurmountable for the High Representative's Cabinet and the Corporate Board of the EEAS, and past experience of evaluations and other evidence-based assessments has faced and overcome similar issues. The following section draws on insights from past experience of reviews, evaluations and audits to suggest and analyse possible approaches to the EEAS review.

Analytical approaches for reviewing the EEAS

It is important to note that while the EEAS is a relatively unique beast it is certainly not the first political institution or initiative to be reviewed. Indeed, a wide range of experiences and examples (including those by other EU institutions and international organisations) are instructive. In this section, five approaches for the review are distinguished based on logical reflection on the texts that provide the legal basis for the review and the EEAS. For each approach, this note will present the focus and reasonable expectations as to its practical and political feasibility, referring to the obstacles noted in Section 2.2, as well as the likely process of the review. Table 1 provides a summary overview.

3.1. Approach 1: By the book

The terms of reference for the review in this approach (on the basis of which an intervention logic can be constructed) would be the particular articles in the legal text of the Council Decision referring to the review - Articles 13 (3) and, by extension, Articles 6 (6), (8) and (11). As per the text, the review would mainly seek to look into the degree of compliance with the Council Decision at an operational or outcome level, with the establishment of a relevant, adequately functioning diplomatic service for the EU taken as the broad objective. In that respect, the format of the assessment can draw on past reviews and audits. Mid-year assessments of the UN Peacebuilding Commission's roadmaps, as well as the independent evaluation of the UN 'Delivering as One' initiative 32 could prove instructive.

This review could for the most part be conducted internally, and would only involve discussion with the Member States and other EU institutions ex-post or on an advanced draft. While 'by the book' may therefore be the simplest methodologically and most defensible legally (being based on prior agreement), merely 'checking the gauges' is too narrow to showcase what the EEAS has or has not achieved. Undoubtedly even in this narrow interpretation of the review a fair degree of (intra- and inter-institutional) politics will unfold, and the outcome so limited in scope is unlikely to satisfy many stakeholders, including the EEAS itself. Moreover, the run-up and coverage of the 2011 report has shown that Member States and the hierarchy itself are interested in assessing the EEAS beyond the scope of the legal text.

3.2. Approach 2: Performance against purpose

The terms of reference for this approach would be the legal texts and documents that most clearly enunciate the purpose and objectives of the EEAS as noted in Box 2. This scenario would put emphasis on results obtained: policy responses and strategies produced, dialogues conducted and (joint) actions undertaken, and assess to what extent the EEAS supported the High Representative, the Member States and the Commission in realising these results. In tying operational performance to internally defined standards, the review could draw on the method of past reviews and evaluations. The end-result could be likened to impact assessments currently conducted by the European Commission³³, and as such would involve active consultation with and input from the various EU institutions, civil society and the Member States. The independent evaluation of the UN 'Delivering as One' initiative could again prove instructive. 34

This approach would certainly provide for a more political assessment while also giving more of an insight into what the EEAS has achieved. It furthermore introduces a strong accountability aspect and offers opportunities for 'tuning and oiling' some parts of the EEAS. In all likelihood the various stakeholders will assess and contest the EEAS on the basis of the purpose and objectives that they believe it should have,

³² UN, 2012a and 2012b

³³ See http://ec.europa.eu/governance/impact/ia_key/ia_key_en.htm ibid

rather than what was agreed. Articles 2 and 3 of the Council Decision offer some methodological grounding and a solid basis on which to structure the discussions in an effort to guard against a 'free for all' review. Crucially, this approach offers an opportunity to formalise a definition of the 'comprehensive approach'.

3.3. Approach 3: Performance against principle

The agreed operational principles of the EEAS' function - coherence, stability, cost-neutrality³⁵ and visibility - would be the yardstick(s) for the review in this approach, reflecting both the EEAS' grounding in the Lisbon Treaty and the guidelines of the Council Decision. This track would put emphasis on the role of the EEAS in obtaining (perceived) results though the 'comprehensive approach' in specific situations and 'showcase' them, e.g. the crisis response in Haiti in the Arab Spring countries, the fight against piracy off the coast of Somalia, the role of EU in the Middle East Peace Process and maintaining peace in the Balkans. In tying operational performance to internally defined standards, the assessment will draw on the experience of past *reviews* and *evaluations*. Given the more thematic and geographic focus, groups of key stakeholders from within and outside the EU (e.g. Delegations, partner governments and civil society) would have to be consulted if the EEAS was to credibly demonstrate its added value.

A good source of inspiration for this track is the Joint Evaluation Unit's list of evaluation criteria (adapted from those of the OECD)³⁶. This approach devises questions according to seven criteria: relevance, effectiveness, efficiency, sustainability, impact, coherence / complementarity and added value. The first five follow internationally agreed best practice for evaluations, while the latter two criteria are designed specifically for evaluations of EU initiatives in accordance with the '3 C's' of coordination, complementarity and coherence introduced in the Maastricht Treaty³⁷. As a result of serious deficits identified in these areas in a prior internal evaluation of DG ECHO, certain Member States strongly advocated that this second, external evaluation of DG ECHO³⁸ consider the extent to which DG ECHO's initiatives adhere to the 3 C's. In addition, the 2006 mid-term evaluation of the African Peace Facility³⁹ provides a good example of an evaluation based on principles – the evaluators faced similar challenges to the EEAS review in that it was too soon to assess the impact and sustainability of the facility, yet still developed a methodology to assess its relevance, effectiveness and efficiency.

A review of operational principles constitutes the logical next step to the second approach, particularly if a definition of the 'comprehensive approach' were put forward. At first glance this third approach holds the benefit of offering a perspective on the 'results' of the EEAS. Results based assessments have gained prominence in the public sector, particularly in times of austerity. The challenge would be to develop objective judgement criteria and indicators that could be credibly isolated and linked to the actions on the part of the EEAS in just two years – deciding what garage to take the EEAS to will in itself require a great deal of negotiation between the various stakeholders (e.g. MS, EP, EC). However, given that the upcoming review was to some degree called for in the interest of demonstrating the EEAS' added value, it would be more than justifiable to base the review on a relevant 'best practice' definition. Time is perhaps too short to realistically negotiate and establish this practice.

3.4. Approach 4: Projecting Europe

The terms of reference for this approach would be the 'first principles' and stated ambitions for EU external action noted in Articles 3 (5) and 21 of the TEU, where the focus of the review would be to establish the EEAS' perceived positioning and progress towards realising these ambitions – i.e. assessing

³⁵ Recital 15 of the Council Decision notes a particular operational requirement of the establishment of the EEAS, stating that it should be "guided by the principle of cost-efficiency aiming towards budget neutrality. To this end, transitional arrangements and a gradual build-up of capacity will have to be used. Unnecessary duplication of tasks, functions and resources with other structures should be avoided. All opportunities for rationalisation should be availed of"

³⁶ See http://ec.europa.eu/europeaid/evaluation/methodology/methods/mth_ccr_en.htm#03 and http://www.oecd.org/dac/evaluationofdevelopmentprogrammes/daccriteriaforevaluatingdevelopmentassistance.htm.
The OECD criteria for evaluation otherwise reappear in a wide range of evaluations.

³⁷ See also the resource guides available at http://www.three-cs.net/index.html

³⁸ European Commission, 2006. http://ec.europa.eu/echo/files/evaluation/2006/dg_echo.pdf

³⁹ Mackie et al, 2006

http://www.ecdpm.org/Web_ECDPM/Web/Content/Download.nsf/0/A96DA4D82E645FCEC125761E005016AD/\$FILE/APF%20Evaluation%20-%20Final%20Report%20Ecorys%20version%20_010206%20KG_.pdf.

the extent to which EEAS is able to coordinate, manifest and deliver a single European diplomatic presence, speaking 'on behalf of a single, globally active legal entity' as a platform for European values. The review would be most likened to an *evaluation*. An example of this type of review is the 2010 Assessment Study of the Africa Peace and Security Architecture.⁴⁰

This track constitutes the most resource- and time-intensive assessment, in which all relevant stakeholder groups would need to be consulted, and especially the Member States would be heavily implicated. The benefit of this approach is it captures the full ambition and reality of EU external action post-Lisbon, but therein also lays its weakness. As the EEAS' ability to deliver on the 'first principles' is largely impacted by the conduct of its stakeholders (e.g. Member States and the Commission), this type of review would have to be sanctioned and agreed by them all. While precedents do exist for this type of multi-stakeholder evaluation of sensitive EU external action issues, these methods have never been applied to issues or institutions where the political stakes are so high.⁴¹ Taking the EEAS to a 'certified garage' would scrutinise also the Member States' own performance, and potentially open up bigger questions regarding the European project and the conduct of EU external action. It is therefore highly unlikely that this approach would be agreeable – there is instead the risk that this approach would reignite discussions on issues that took 10 years of discussion prior to agreeing the Lisbon Treaty.

3.5. Approach 5: Second Report by the High Representative

This approach would follow the precedent set by the 2011 report by the High Representative. In respecting the requirements of the legal text (Article 13 (2) of the Council Decision) as a basis to study not only the progress made towards the immediate 'Lisbon tasks' but also address the contemporary political context, the assessment takes the shape of an **analysis of the evolutions of EU external action over the past year**. This approach could also draw on DG ECHO's external evaluation, which presents an overview of the progress made since the previous evaluation.

It also seems inevitable that this review would be heavily politicised and the result an essentially political document. This could make it challenging for the review to have a formal methodological basis due to the (political) context: the focus, process and results of the review would in effect be decided through political dialogue rather than logical rigour. This would amount to tuning the gauges rather than the car itself.

Table 1: Summary overview of analytical tracks for assessing the EEAS

Approach:	Political Feasibility:	Practical Feasibility:	Approach Illustrated by:
1: By the book	Legally defensible but not satisfying for stakeholders. Does not address strategic and output challenges.	Straightforward, largely internal execution. Discussions to take place ex-post.	 Progress Reports of the Implementation of the UN Peacebuilding Commission Roadmap for Action Independent Evaluation of UN 'Delivering as One' initiative
2: Performance vs. purpose	Risk of discussion stalling on different interpretations of the EEAS' purpose rather than performance against agreed purposes as per legal basis.	Methodological grounding provided by Article 2 and 3 of Council Decision.	European Commission Impact Assessments Independent Evaluation of UN 'Delivering as One' initiative
3: Performance vs. principle	General agreement on 'results-based' approach, yet difficult to define objective criteria.	Heavy negotiations required both in the run-up and execution of review.	External Evaluation of DG ECHO 2000-2005 OECD DAC Peer Review of the Development Co-operation Policies and Programmes of the European Union Mid-Term Evaluation of the

⁴⁰ African Union, 2010 http://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/RO%20African%20Peace%20and%20Security%20Architecture.pdf

⁴¹ A Group of EU Heads of Evaluation Services established a Task Force for the assessment of the Maastricht Treaty precepts, coordination, complementarity and coherence known as the "3 C's Initiative" in which the European Commission (AidCO and ECHO), the United Kingdom, Belgium, France, Germany, Netherlands, Ireland, Sweden, Portugal, Italy, Czech Republic and Poland actively participated. The initiative ended in 2008 – see http://www.three-cs.net/about-the-3cs-initiative.html

			Africa Peace Facility
4: Projecting Europe	Full scope of EU external action covered, yet requires sustained consensus on sensitive issues.	Highly resource- and time- intensive. Requires coordination between 28+ immediate stakeholders on contentious issues.	Assessment Study of the African Peace and Security Architecture
5: Second HRVP Report	Based on neutral precedent, shifts emphasis to assessment process and expost discussions. Risks forgoing opportunity to promote change and gain legitimacy.	Flexible format allows for adaptation to needs.	2011 Report by the High Representative to the European Parliament, the Council and the Commission External Evaluation of DG ECHO 2000-2005

The latter approach represents the most practical scenario. The methodology has precedent and while the 2011 report did not generate great enthusiasm from the stakeholders, nether did it invoke any major political backlash. It is, however, likely that the interpretation of the results of the review by EU stakeholders, notably the Member States, EP and civil society, will be much more critical - this track would therefore shift the emphasis of the review from the results and the document to the political dialogue of the passengers operating the EEAS. Discussions and negotiations prior and following the publication of the review in fact become the review.

Drawing on these approaches, the following section offers some concluding remarks on the state of play of the EEAS review, as well as some recommendations to the benefit of the EEAS' legitimacy.

4. Concluding Remarks and Recommendations

The review process and outcome will not make or break the EEAS, yet it nonetheless represents the most prominent milestone and formal opportunity for learning and accountability of the coming years. It is therefore important that those planning and implementing the process do so with their eyes open to potential options and challenges beyond those political in nature. The obstacles for the review noted in this Briefing Note should not be interpreted as constraints – they are factors that are likely to be fully part of the political bargaining and agenda-setting process which will define both the shape and the contents of the review document.

The initiative to drive the review process is currently with the High Representative, her Cabinet and the EEAS Corporate Board, though other stakeholders – notably the Member States – will not forego an opportunity to affect the course of the EEAS in the wider context of the success or relevance of European external action and the Lisbon Treaty. Whether this will be a battle between those wanting "more" or "less" Europe rather than a review of the EEAS remains to be seen. Indeed stakeholders in pursuit of their interests will be seeking to alternate the discussions between the various approaches noted in Section 3. Yet it would be a missed opportunity if the chance to formally review the EEAS were not seized by conducting a transparent process of learning while at the same time promoting the type of accountability necessary for the EEAS to gain credibility.

The fifth approach (based on the 2011 report) is the most likely course of action for the review, given its precedent and the space afforded by the legal basis and the short timeframe. As such, a conscious effort should be made to ensure that such a review does not forego the opportunity to increase the legitimacy of the EEAS. It may be tempting to simply accept that lack of clarity on the purpose and methodology of the review allows for broader scope and greater flexibility in adapting the agenda of the discussions to the political environment. However there is something to be said for setting clear expectations and methodological rigour in terms of delivering credible findings that help carry the service forward. Several important components from the other approaches and from past evaluation practice can help increase the rigour of the review and lighten the political pressure to a degree, and are therefore worth integrating into the process:

- Establish **terms of reference prior to the review**, clearly identifying the basis, objective and time-frame of the review and specifying the role of each stakeholder group⁴²;
- Linking internationally agreed evaluation indicators and criteria to the review, justifying alterations or deviations;
- Develop a structured set of key questions through which to conduct the review transparently, as well as a clear process for deriving conclusions and recommendations from the information presented;
- **Highlight specific examples or case studies** to gain an in-depth understanding of the role and value of the EEAS in specific circumstances.

The review will most likely become heavily politicised, a structured approach could set a useful precedent for future evaluations of the EEAS' efforts. For instance, a review informed by standard practices and agreed criteria for evaluations could lay the groundwork for comprehensive evaluations of the EEAS' other actions such as integrated regional strategies. Reflecting on past experiences and the menu of options available may generate a more honest and ultimately more useful process for all.

This publication has been produced by the European Centre for Development Policy Management's (ECDPM) EU External Action Programme in the context of its on-going work focussing on reconciling EU's values and interests. It complements past ECDPM work which was targeted towards assessing the consequences of post-Lisbon institutional innovations for poverty related development goals, a theme which ECDPM will return to in future work. ECDPM plans to follow up this paper with other analytical pieces looking at the role of EU Delegations and the integrated regional strategies/frameworks in Africa. This work is designed to draw on ECDPM's experience, network and competence to strengthen EU external action to promote development goals and outcomes.

On this aspect, there has notably been good practice in the using Reference Groups in EU and Member States' past evaluations. Reference Groups normally include the 'direct stakeholders' of the evaluation, who provide comments on process, design, methodology, key questions and the intermediate (draft) outputs during the evaluation process. This serves to enhance the quality control, ownership, and relevance of the process and outputs. Effective Reference Groups requires stable membership, good facilitation of discussion and input, and at times firm management.

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