

A close-up photograph of a traditional copper teapot pouring hot water into two glasses of red tea on a wooden table. The teapot is ornate with embossed patterns. The glasses are tulip-shaped and filled with a vibrant red liquid. The scene is set on a rustic wooden table with a blue and white patterned cloth. The lighting is warm and golden, suggesting a late afternoon or early morning setting. In the background, a small bowl and a spoon are visible on the table.

October  
2018

## FACILITATING DIALOGUE: EU- FUNDED NGOs AND THE NAGORNO-KARABAKH CONFLICT

NGO MONITOR



# **FACILITATING DIALOGUE:** **EU-Funded NGOs and the** **Nagorno-Karabakh Conflict**

**October 2018**

NGO Monitor's mission is to provide information and analysis, promote accountability, and support discussion on the reports and activities of NGOs claiming to advance human rights and humanitarian agendas.

10 Yad Harutzim St.  
Jerusalem, Israel 9342148  
Tel: +972-2-566-1020  
Fax: +972-77-511-7030  
[mail@ngo-monitor.org](mailto:mail@ngo-monitor.org)  
[www.ngo-monitor.org](http://www.ngo-monitor.org)

Institute for NGO Research (R.A. #580465508)  
Organization in Special Consultative Status  
with the UN Economic and Social Council since 2013  
© 2018 NGO Monitor. All rights reserved.

## EXECUTIVE SUMMARY

- The following report examines the role of non-governmental organisations (NGOs) in EU-funded peacebuilding efforts in Nagorno-Karabakh (NK). The evidence points to a lack of oversight and a general inadequacy in addressing challenges in the region. Most pertinently, the severely restricted access to the region is not taken into account.
- The EU's main NGO programme in the region, European Partnership for the Peaceful Settlement of the Conflict over Nagorno-Karabakh (EPNK), is fraught with conflicts of interest. A number of EPNK implementing NGOs were commissioned to recommend policy interventions in NK prior to the programme's commencement. Five years into EPNK's implementation, the same NGOs were consulted by the EU regarding the programme's continuation - which was subsequently renewed for a third phase.
- One of EPNK's programme partners, London Information Network on Conflict and State Building (LINKS), has no available financial reports for three of the years that it received programme funding. Furthermore, LINKS has a clear financial dependence on EPNK funds, which amounts to over 85% on average of the organisation's budget. Of this, over 50% was paid to the organisation's sole employee in consultation and travel fees, or owed to him in debt. Further, due to forced liquidation in 2013, LINKS did not legally exist for seven months during which it reportedly received EU funds.
- Activities conducted within the EPNK programme have poor outreach to relevant audiences and, to a large extent, fail to meet the stated objectives of increasing grassroots engagement and facilitating an independent civil society network. The social media initiatives and online networks are not sufficiently promoted and have achieved little to no visibility.
- It is unknown whether these findings reflect unintended consequences, abuse of trust on behalf of one or more of the parties, or political backscratching. It appears, however, that the EU's existing mechanisms for engagement with NGOs fall short in terms of due diligence and oversight.

## INTRODUCTION

The following report examines the involvement of non-governmental organisations (NGOs) in EU-funded peacebuilding efforts in Nagorno-Karabakh (NK) in order to gain a better understanding of the challenges and structural issues related to the use of NGOs as peacebuilding agents.

As stated by the European External Action Service (EEAS), “Peace building and conflict prevention are at the heart of EEAS action. The EU aims to ‘promote peace, its values and the well-being of its peoples’...and to ‘preserve peace, prevent conflicts and strengthen international security.’”<sup>1</sup> The EU is a major supporter of peacebuilding efforts across the globe, including in conflict and post-conflict societies and unrecognised territories, many of which involve international and local NGOs as primary implementers.

The main EU initiative on the NK conflict is the European Partnership for the Peaceful Settlement of the Conflict over Nagorno-Karabakh (EPNK) - a peacebuilding programme led by a consortium of five European NGOs. According to its website, it is a “unique initiative, funded by the European Union that seeks to positively impact the Nagorno-Karabakh conflict settlement process.”<sup>2</sup> Its five member NGOs - Conciliation Resources, Crisis Management Initiative (CMI), International Alert, Kvinna till Kvinna, and London Information Network on Conflict and State Building (LINKS) - “work with local partners in the South Caucasus on a wide range of peacebuilding activities to contribute to lasting peace in the region.”<sup>3</sup> After two subsequent funding phases (2010-2011, 2012-2015), EPNK was renewed for a third phase (sometimes referred to as EPNK III), with a budget of €4.7 million for 2016-2019. EPNK is funded through the Instrument contributing to Stability and Peace (IcSP, previously called the Instrument for Stability).<sup>4</sup>



Screenshot of EPNK's website, <http://epnk.org/>

In January 2017, the EU launched an additional NGO program targeting the region, “Peacebuilding through Capacity Enhancement and Civic Engagement” (PeaCE). According to the EU, “The action proposes peace-building initiatives **separate, yet complementary to those proposed by EPNK III** and aims to broaden participation of local civil society actors and grassroots in peace-building activities, including across the divide” (emphasis added).<sup>5</sup> The NGOs implementing the PeaCE programme include Eurasia Partnership Foundation in Armenia (EPF-Armenia), Eurasia Partnership Foundation in Azerbaijan (EPF-Azerbaijan) through Caucasus Research Resource Centre in Georgia (CRRC-Georgia), and EPNK consortium member International Alert. PeaCE’s duration is 36 months, with a budget of €1,860,000.<sup>6</sup>

## The EU is well-positioned to initiate dialogue

The findings detailed in this report are based on online research and field work carried out in 2017 and early 2018. Interviews were conducted with four local activists from NK involved in EU-funded projects; two representatives of de-facto NK authorities; regional coordinators for the South Caucasus of EPNK consortium members CMI, Conciliation Resources, International Alert and Kvinna till Kvinna; and two EEAS representatives responsible for the South Caucasus. Due to restricted access and limited resources, it was not possible to interview Azerbaijani participants. All interviewees chose to remain anonymous.

The first section of this report provides a general historical background to the conflict, with an emphasis on challenges related to peacebuilding and civil society. The following sections detail issues about EPNK’s initiation and overall activities, highlighting concerns related to conflicts of interest and a lack of oversight, as well as the programme’s apparent failure to meet its objectives. The report then highlights one of the EPNK consortium members, LINKS, and its considerable financial dependence on EPNK funds. The report ends with a review of the activities conducted by the NGOs within the EU programmes.

## I. HISTORICAL BACKGROUND

Though its origins can be traced to as far back as 2,000 years ago, the current dispute over Nagorno-Karabakh first emerged in the 1980s, when the largely Armenian population of the Nagorno-Karabakh Autonomous Oblast (NKAO) raised demands to no longer be under the rule of the Soviet Socialist Republic of Azerbaijan. The resulting tensions escalated into a fully-fledged war between the newly formed states of Armenia and Azerbaijan in 1992. A ceasefire was achieved only in 1994, after Armenian troops took hold of the majority of the NKAO, along with a number of surrounding provinces. Despite numerous international mediation efforts, violence erupted again in April 2016 with a series of military clashes, concluded by a ceasefire after four days.

A major hindrance to peace in the region is an almost complete lack of engagement and/or dialogue across the divide. Exacerbating this issue, access to the region is severely obstructed due to issues related to territory recognition, inherently limiting any peacebuilding or mediation efforts.

As stated by the Embassy of the Republic of Azerbaijan in Romania, Azerbaijan deems any visit of a foreign citizen in NK - as well as “any kind of political, economic, financial, cultural and etc. interaction with (sic) illegal regime established there” - a “direct and crude violation of the sovereignty, territorial integrity and inviolability of borders of the Republic of Azerbaijan.”<sup>7</sup> Consequently, internationals who visit NK are added to a “list of ‘persona non grata’ whose entry to the territory of the

Republic of Azerbaijan is banned.” Irrespectively, Azerbaijan reportedly bans all entry of Armenians to the country, including non-Armenian citizens of Armenian descent.<sup>8</sup>

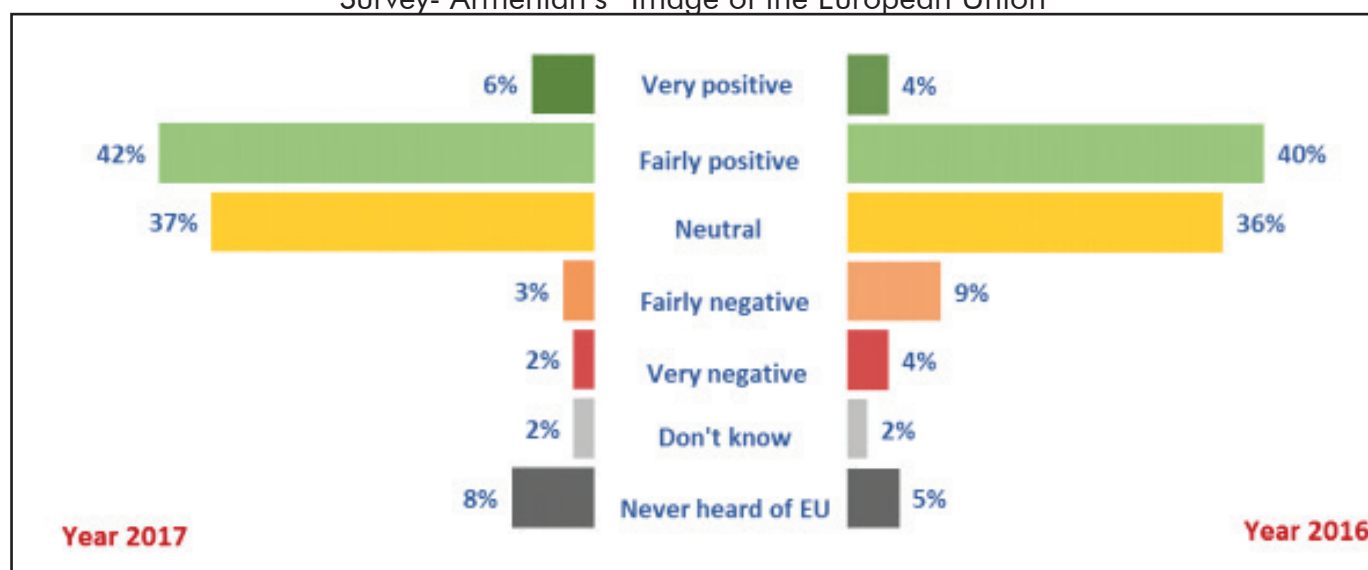
The issue of access is amply demonstrated by the difficulty of de-mining large areas in NK. The only agency currently engaged in mine clearance in NK is the UK-based HALO Trust. As stated by the HALO Trust, “Nagorno Karabakh’s unrecognized status prevents many governments from funding humanitarian activities in the territory and HALO receives no funding from the Armenian Government. Until recently, our only major donor in Karabakh was the US Government, through USAID, but its funding is restricted to land within the Soviet boundary of the autonomous oblast of Nagorno Karabakh.”<sup>9</sup>

Attesting to the need to facilitate dialogue, mutual hostility between the parties to the conflict is firmly embedded in public opinion. A 2012 survey conducted by the Caucasus Research Resource Centre found that 63% of Armenians saw Azerbaijan as the “biggest enemy of Armenia,” and 91% of Azerbaijanis saw Armenia as the “biggest enemy of Azerbaijan.”<sup>10</sup>

Opinion surveys conducted by the EU in 2017 indicate that the EU is well-positioned to initiate dialogue that would enjoy legitimacy on both sides. Pro-EU sentiments are rising in both countries, with 47% of Azerbaijanis and 48% of Armenians having a positive image of the EU. In addition, 51% of Azerbaijanis trust the EU, as do 76% of Armenians; in both countries, trust of the EU surpasses that of other international organisations, including the UN and NATO.<sup>11</sup>

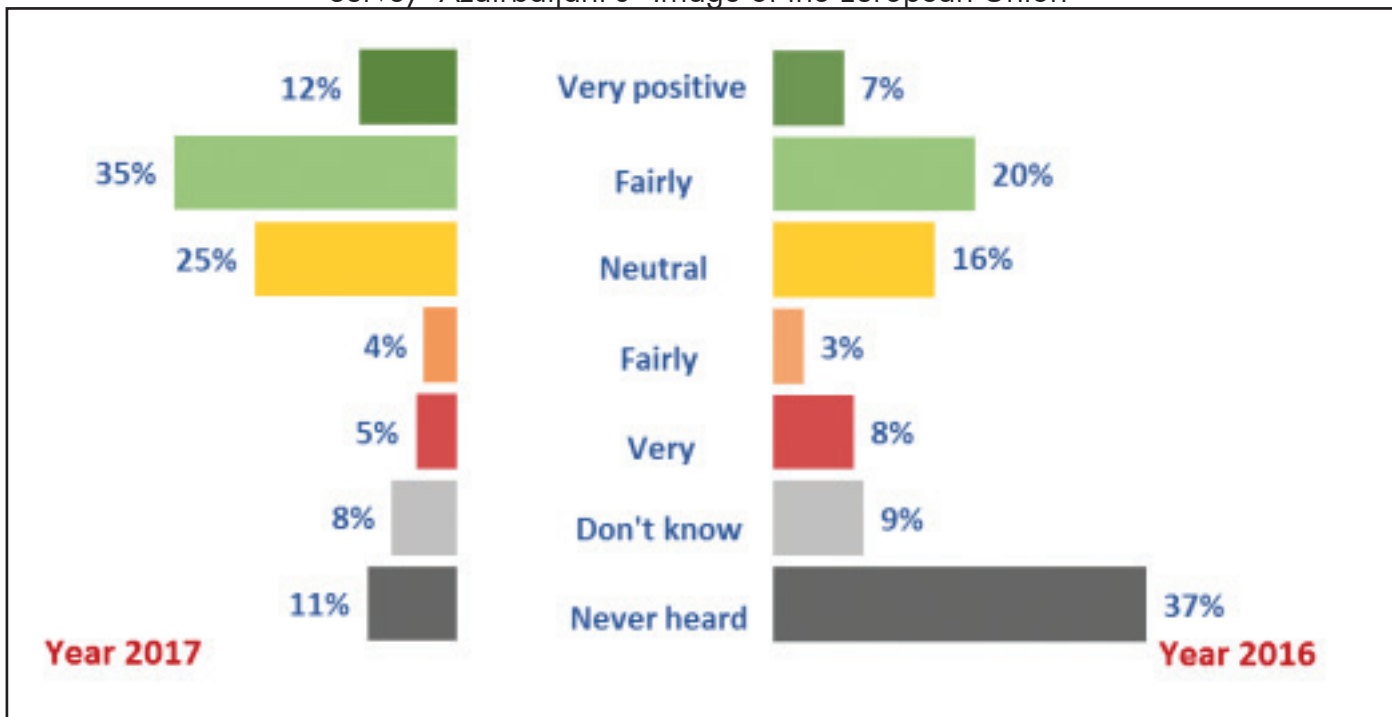
According to an in-depth analysis of EU relations with Armenia and Azerbaijan commissioned by the European Parliament (EP), Azerbaijani civil society supports and expects EU involvement in the resolution of the conflict. In addition, Russia’s current prominence in the region has reportedly elicited Azerbaijani reservations towards existing mediation efforts, such as those by OSCE Minsk Group. As identified by the EP study, Russia “has been using the Nagorno-Karabakh conflict as a means of pressure on Azerbaijan and thus forces the incumbent authorities to manoeuvre between the EU and Moscow.”<sup>12</sup>

Survey- Armenian’s “Image of the European Union”



Source: EU Neighbours East, Annual Survey Report: Armenia. 2nd Wave (Spring 2017)

Survey- Azairbaijani's "Image of the European Union"



Source: EU Neighbours East, Annual Survey Report: Azerbaijan. 2nd Wave (Spring 2017)

## II. INITIATION AND RENEWAL OF EPNK - CONFLICT OF INTEREST?

A year prior to EPNK's commencement, a number of the NGOs (that would later form the EPNK consortium) were commissioned by the EU to provide policy recommendations on EU mediation and peacebuilding efforts. As will be discussed, the resulting EU-funded publications appear to recommend their authors as ideal implementers.

Five years into the EPNK's implementation, an EU-funded NGO network of which all EPNK NGOs but one are members was similarly consulted by the EU regarding the programme's continuation - which was subsequently renewed for a third phase.

The commissioning of NGOs in this manner - first, to help shape policies, then to implement their own recommendations, and finally to assess their own performance - constitutes a conflict of interest and raises questions as to the manner in which EPNK is monitored and scrutinised by the EU.

### EU-Funded Publications

In 2009, the EU funded two publications issued jointly by the CMI and the Initiative for Peacebuilding (IfP) – "a consortium **led by International Alert** and funded by the European Commission" (emphasis added). No longer active, IfP's aim was "to develop and harness international knowledge and expertise in the field of conflict prevention and peacebuilding to ensure that all stakeholders, **including EU institutions, can access strong independent analysis** in order to facilitate better informed and more evidence-based policy decisions" (emphasis added).<sup>13</sup> In addition to International Alert, the European Peacebuilding Liaison Office (EPLO) was also a member of this consortium. With the exception of LINKS, all EPNK NGOs are members of EPLO, and were thus direct or indirect members of IfP.



The first publication, “The Nagorno-Karabakh Conflict: Lessons from the mediation efforts” (published March 2009), identifies “the question of recognition” as a main obstacle to peacebuilding and argues that “the European Union can actively support initiatives from **NGOs and civil society actors** that can facilitate dialogue without conferring official recognition” (emphasis added).<sup>14</sup>

Despite identifying practical limitations derived from the issue of recognition - first and foremost lack of access to the contested region - as crucial factors, the analysis fails to take them into account. Accordingly, the publication does not specify in what manner NGOs would be able to “facilitate dialogue,” what actors such a dialogue would involve, or how this could amount to meaningful change. As shown in subsequent sections of this report, these limitations would significantly impede the range, intensity, and effectiveness of EPNK activities.

The second publication, “Engaging the EU in Mediation and Dialogue” (published in May 2009), similarly concludes that “While official mediators struggle with the dilemma of the involvement of non-recognised/de facto parties in negotiations without overtly legitimising their claims, **non-governmental institutions can circumvent the issue of recognition** by providing all parties concerned with the avenues for participation” (p. 14, emphasis added). It adds that “Informal mediation by non-governmental organisations (NGOs) and faith-based organisations indeed holds an important place in international peace mediation,” arguing that “**Proactive and regular outreach to these actors** can help the EU draw on their expertise and experience more consistently for its own mediation efforts” (emphasis added).<sup>15</sup>

On the basis of these assumptions, the publication recommends to “Tailor EU financial and policy tools **such as the Stability Instrument and the PbP** [Peacebuilding Partnership], **but also the EIDHR** [The European Instrument for Democracy and Human Rights] as well as official development assistance through instruments such as the Development Cooperation Instrument to **improve linkages between governmental and non-governmental actors** involved in different mediation efforts” (p. 22, emphases added). The publication further recommends the EU to “**Work actively with specialised NGOs working in the field of mediation either based in the EU** and (sic) in conflict affected countries” (p. 22) – an apt description of the NGO authors of the publication.

## Launch of EU-Funded Programme

In 2010, shortly after the release of these publications, International Alert, CMI, and two other EPLO member NGOs received an initial budget of €2,000,000 from the EU’s Instrument for Stability (now Instrument contributing to Stability and Peace) for peacebuilding activities in NK (2010-2011).<sup>16</sup> For EPNK’s second phase, spanning just less than three years (2012-2015), this amount was tripled (€6,000,000).<sup>17</sup>

In May 2015, towards the end of the second phase, EPLO was “requested to organise a meeting in the framework of the Civil Society Dialogue Network (CSDN) with representatives of peacebuilding civil society organisations (CSOs) working in the region,” in light of the EU’s commitment to “continu-

Conflict of  
Interest?  
Implementing  
NGOs were  
consulted on  
their own  
performance



ing its support to the Nagorno-Karabakh conflict settlement process.” As stated in the concept note for the meeting, its outcome would “feed into the design of future EU assistance to this process.”<sup>18</sup> CSDN is co-financed and co-managed by the European Commission.

Thus, EPLO member NGOs that had received EU funding for designated activities via EPNK were also consulted to determine how and whether these activities should continue, through a different EU-funded platform.

According to the EU’s Financial Transparency System (FTS), EPNK was renewed for a third phase (EPNK 3), receiving a €4,732,120 grant in 2016.<sup>19</sup> According to the EPNK website, the third phase of EPNK will last from May 2016-April 2019 with a total budget of €4,732,708.<sup>20</sup>

### III. ENGAGING LOCAL CIVIL SOCIETY?

As stated on its website, EPNK’s goals consist of (emphases added throughout):

- “**Increasing peoples participation** in a peaceful resolution of the conflict, especially marginalised groups;”
- “Building confidence and trust **between all sides** of the conflict through increased contact between people;”
- “Encouraging fresh analysis and new ideas that challenge existing thinking on the conflict and seek to promote peace;”
- “**Encouraging civil society to play an active part in the dialogue** with policymakers at national and international levels on how to transform the Nagorno-Karabakh conflict in a peaceful way.”<sup>21</sup>

The consortium purports to pursue these goals, among other means, by “Creating an **independent civil society framework** for European non-governmental organisations (NGOs) to engage with the Karabakh conflict” and “build(ing) relationships and confidence across the conflict divide” (emphasis added).<sup>22</sup>

Echoing the policy recommendations reviewed in Section II, EPNK does not directly address the lack of access to the region as an impediment to these professed goals. Beyond limiting the scope of activity in NK itself, ongoing travel bans render it virtually impossible to bring Armenians and Azerbaijanis together in either country. None of the involved organisations suggests strategies to overcome this obvious hurdle or addresses it in any way.

Unsurprisingly, the vast majority of activities supported and conducted within the framework of EPNK do not take place in the affected region and involve only a limited engagement with local actors.

The Regional Grants Initiative (RGI), established as part of the EPNK’s second phase in order to “provide a flexible mechanism for funding new activities in the context of the Nagorno-Karabakh conflict,” illustrates this shortcoming. According to EPNK’s website, RGI funded “five projects receiving a maximum of 20,000 Euros... implemented between March and November 2014,” with a total budget of €100,000. Details are provided on only four of these projects, three of which took place in Georgia.<sup>23</sup> Thus, the RGI utilised only one-sixtieth of the total EPNK Phase II budget (€6,000,000) for supporting local civil society, for a handful of projects involving a miniscule segment of the local population. There is no information regarding a similar initiative in the programme’s third phase

(2016-2019).

Likewise, as of February 2018, EPNK's "Project highlights" boasts seven projects from 2017-2018. These projects took place in Oxford, Brussels, Vienna, Minsk, and London.<sup>24</sup> Some of the activities, such as an academic conference on the South Caucasus in Oxford and a European Parliament event on "confidence-building measures," featured international experts and panellists, but did not involve grassroots participation.<sup>25</sup> Others included only small groups of local professionals - "journalists," "young researchers," or "experts from think tanks and civil society groups."<sup>26</sup>

## None of these organisations address the issue of restricted access to the region

Indeed, local NGO officials and EPNK partners on the ground expressed their conviction in interviews that local civil society, democratic institutions, and the peace process as a whole could vastly benefit from increased funding for activities in the region that directly involve the local population. Other civil society activists pointed out that engagement and active interaction with the local population has been lacking throughout the course of EPNK, and that therefore fomenting an independent civil society network was

far from successful. The trainings and trips organized under the auspices of the EPNK programme involved only a small number of people, inherently limiting the scope of dialogue between civil society actors from conflicting sides. Moreover, those activities that were carried out were not sufficiently communicated to wider audiences within affected societies.

A March 2018 academic paper on NGO peacebuilding programs in NK, asserts "serious discrepancies in funding" in the region, citing indications that "some organizations have a monopoly: EPNK, a consortium of five organizations, has a budget of €4.7 million (USD\$5.8 million) for 2016-2019, whereas CRISP [Crisis Simulation for Peace], a small organization, received only around €50,000 (USD\$61,000) for 2016 to do trainings in the Caucasus."<sup>27</sup>

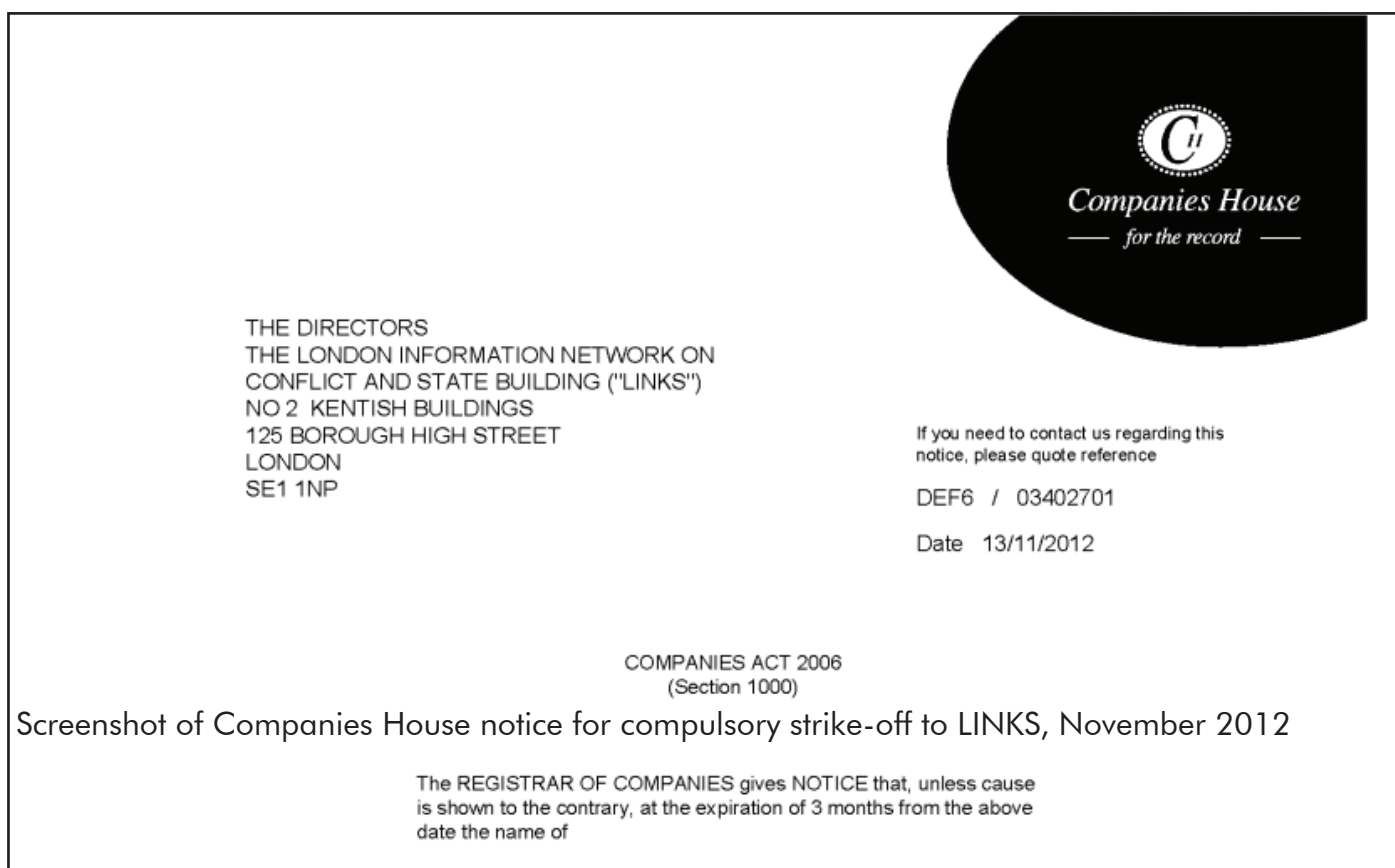
In the same vein, the PeaCE initiative, created for "re-engag(ing) Armenians and Azerbaijanis from geographic areas affected by the Nagorno-Karabakh conflict in peacebuilding activities, as well as reviv(ing) the peacebuilding process within and between these societies," has seen limited participation of NGOs from NK, according to interviews. This is attributed both to cumbersome application procedures and to a lack of significant physical presence of PeaCE's international implementing NGOs. As neither the implementing NGOs nor the EU appears to publish details online as of February 2018, there is no readily available information as to the projects and beneficiaries of the PeaCE programme. Rather than addressing the shortcomings of an existing programme – i.e., EPNK – the EU launched an additional programme with almost identical objectives and an overlapping implementer (International Alert).

Another factor, which specifically inhibits the participation of Azerbaijani NGOs, is restrictive legislation. According to the International Center for Not-for-Profit Law (ICNL), despite a significant simplification of the registration process for foreign-funded NGOs approved in October 2017, Azerbaijani law still allows for "government discretion on whether to approve or deny registration of a grant."<sup>28</sup>

## IV. LINKS AND EPNK FINANCIAL CONCERNS

The London-based NGO LINKS is the only EPNK consortium member that was not directly or indirectly involved in the decision-making process surrounding EPNK's initiation and renewal (see section II). Regardless, financial reports point to a clear financial dependence of LINKS on EPNK funds, as well as a notable financial reliance on fellow EPNK member Conciliation Resources in the two years leading up to EPNK's initiation.

For three of the eight years during which LINKS participated in the EPNK programme, there are no available financial reports submitted to the UK's company registrar ("Companies House"). These include seven months during which the organisation did not legally exist - from its forced liquidation in February 2013 to its re-incorporation under a slightly different name in October 2013 - "LINKS (Dialogue, Analysis, Research)."<sup>29</sup> Throughout its existence, LINKS had a total of 11 registered employees – of which all but two had resigned by the time of its dissolution in 2013.<sup>30</sup> Since its re-incorporation, the organization's sole registered employee is the director, Dennis Sammut.



According to the financial reports available on the Companies House website for the period of LINKS' participation in EPNK (2010, 2014, 2015, 2016), EPNK grants amount to an average of over 85% of the organisation's annual income, of which an average of over 50% was paid to Sammut in the form of consultancy and travel fees, or owed to him in debt (see Table I).<sup>31</sup>

As of 2016, the company reports a retained deficit of £5,289 and a total debt of £36,110 of which £23,913 is owed to Sammut. The 2016 report states, "The director believes that the company is able to pay its debts as they fall due... In particular, the director does not intend to seek full repayment of amounts owed to him if this would affect the company's ability to continue in operation. **Furthermore, European Union funding was secured in 2016 for a period up to May 2019**" (emphasis added).



Of the few reported non-EU contributions during this period, at least two appear to be EPNK funds under a different name. In 2015, the only source of income other than the EU is reported as “the OIC Youth Forum Conference” (£17,593). As described in the narrative section of the report dedicated to EPNK activities, the OIC Youth Forum Conference was in fact “a major conference in Brussels” held in March 2015 by LINKS and the inter-state Organisation for Islamic Co-operation (OIC), under the auspices of EPNK. The OIC Youth Forum was created and chaired by a high ranking official of the Azerbaijani Ministry of Foreign Affairs.<sup>32</sup>

Similarly, the 2016 financial report lists a £22,000 contribution from “Caucasus Concise.” Caucasus Concise is the name of a weekly newsletter issued by LINKS’ news portal, commonspace.eu, as part of the EPNK program. It is available on an EU-funded website. There is no indication that Caucasus Concise is an entity in its own right, nor are there any details available as to additional sources of funding.<sup>33</sup>

Over the course of its existence, LINKS was threatened four times with forced liquidation. Between 2007 and 2010, it did not publish financial reports, publishing accounts for the years 2007-2009 only retroactively, between December 2010 and May 2011.<sup>34</sup> LINKS’ 2008 financial report notes that “The company has net liabilities of £180,049 at 31 December 2008[.] The company has secured additional funding after the year end and the accumulated losses are expected to be eliminated.” However, the following year (2009), LINKS’ total income amounted to a mere £45,527, all of which came from Conciliation Resources. LINKS also received a £56,370 grant from Conciliation Resources in 2008.

Table I: Data from LINKS’ financial reports

Year	Total Income	EU Contribution	Other Contributions	Remuneration to Sammut	Debt Owed to Sammut
2008	£111,875	None	Conciliation Resources: £56,370 FCO: £16,055 Irish MFA: £16,055 “Other grants – 5,000 and under”: £10,000	£13,000	£42,220
2009	£45,527	None	Conciliation Resources: £45,527	None	£59,823
2010	£175,481	£175,481 (reported as International Alert)	None	£21,000	£49,217
2014	£137,333	£135,150	Donations: £2,183	£63,725 + travel fees (unspecified)	£1,501
2015	£99,605	£81,997	OIC Youth Forum Conference: £17,593	£61,326	£1,316
2016	£192,333	£143,848	John Smith Trust: £24,150 Caucasus Concise: £22,000 Miscellaneous: £2,332	£95,630	£23,913

LINKS proclaims to have “provided space for dialogue and analytical discussion, backed by in-depth research, on issues related to the Caucasus region and more particularly the Nagorny Karabakh

conflict for nearly two decades.” In addition, the organisation claims to contribute “to a broader understanding of the conflict, and processes around it, in a wider regional and international context through constant engagement with the international community.”<sup>35</sup>

In contrast, local civil society representatives interviewed for this report have emphasised the lack of on-the-ground engagement of LINKS in NK. Although LINKS claims to maintain “regular dialogue with the governments, parliaments and political forces in Armenia and Azerbaijan, the de facto authorities in Nagorno-Karabakh, the displaced community of Azerbaijanis from Nagorno-Karabakh, and other stakeholders from across the conflict divide,” de-facto officials in Stepanakert noted with concern the persistent lack of any engagement with LINKS.

## Civil society representatives emphasised LINKS’ lack of engagement

LINKS’ most meaningful endeavour within the EPNK framework appears to be commonspace.eu, a news portal that publishes articles and commentaries in Russian and English, and is complemented by a Facebook page with approximately 15,000 followers.<sup>36</sup>

In EPNK’s third phase, LINKS is “working closely with two leading think-tanks, the European Policy Centre in Brussels and the International Peace Institute in Vienna.” It is unclear whether or how this affects funding allocations. Dennis Sammut is also a member of the European Policy Centre’s strategic council.<sup>37</sup>

## V. EPNK CONSORTIUM MEMBERS

The inadequacy of the EPNK programme is further implicated by the activities of some of its respective consortium members.

The “lead EPNK member organisation” is International Alert.<sup>38</sup> The UK-based NGO has been working on the NK conflict for almost 15 years, since 2003, and was referred to in interviews with local activists as an active and important actor.<sup>39</sup> International Alert is also an implementing partner in the PeaCE programme.

According to the EPNK website, International Alert’s activities within the programme consist of two main projects:

- “Envisioning Peace” - a “participatory research initiative” that “brings together a group of 11 researchers from Armenia, Azerbaijan and Nagorno-Karabakh,” who “were trained in our new methodology to stimulate reflection on the human and social cost of the conflict.” Envisioning Peace has an inactive Instagram account with three followers and no posts.<sup>40</sup> There is no other available platform regularly communicating activities related to the initiative.
- “Unheard Voices” - a “cross-conflict network of journalists and editors from leading media outlets in Armenia, Azerbaijan and NK,” which aims to “ensure their voices are heard both at home in their own societies and on the other side of the conflict divide, allowing readers to see the real faces hidden behind the images of ‘the enemy.’” According to International Alert, articles are published in Armenian and Azeri in local media outlets, and in Russian on a designated Facebook page with 1,173 followers. The project also has a Twitter account with 40

followers (as of February 2018).<sup>41</sup> In September 2017, EPNK announced a “relaunch” of the project along with a new website, JAMNews, which is regularly updated.<sup>42</sup>

International Alert’s 2016 annual report makes no mention of EPNK activities. While it reports £1.9 million in “institutional grants,” it does not provide a breakdown.<sup>43</sup>

Activities conducted by other EPNK organisations appear to be more sporadic and have poor outreach.

According to its 2016 annual report, 7% of CMI’s budget came from the EU (roughly €450,000), with EPNK being the only EU-funded project.<sup>44</sup> On its website, CMI boasts “the creation of a cross-conflict platform of emerging professionals,” the result of “five years of sustained engagement by CMI” within the framework of EPNK.<sup>45</sup> There is no systematic documentation of the activities carried out within this network, or their impact.

In 2015, CMI produced an animated video highlighting the importance of dialogue in the conflict. The video, captioned, “Peacefall, Episode 1: ‘Legacy,’” has 2,463 views on YouTube as of February 2018. No further episodes were uploaded.<sup>46</sup>

Civil society activists from NK reported activities conducted by CMI with civil society representatives from the region. One participant in CMI activities reported that they had managed to procure a PeaCE grant for a project focusing on debate and research thanks to the skills they had acquired over the course of their participation.

Similarly to CMI, Conciliation Resources leads a Karabakh Contact Group (KCG) - “a flexible and confidential format in which controversial issues can be discussed, assumptions tested and ideas generated.”<sup>47</sup> According to Conciliation Resources, the group provides “a rare opportunity” for activists from both sides to exchange ideas face-to-face: “Meetings, held under the Chatham House Rule, typically last 2-3 days and take place in a location that is accessible and acceptable to all participants. Most meetings have taken place in the Georgian capital, Tbilisi.”

The only KCG gathering highlighted by Conciliation Resources and the EPNK program is a 2014 meeting in Washington.<sup>48</sup> As of February 2018, there is no documentation available on other meetings, except for a 2015 publication “based on a meeting of the Karabakh Contact Group... Held over three days in Tbilisi in late 2014.”<sup>49</sup> In addition to the EU, the KCG also received funding from the UK Government’s Conflict, Stability, and Security Fund.<sup>50</sup>

Kvinna till Kvinna “supports Armenian and Azerbaijani women’s organisations and individual women’s rights activists to promote women’s empowerment and participation in the Nagorny Karabakh peace process.”<sup>51</sup> While the organisation has a section on its website dedicated to the “South Caucasus,” the most recent post (as of February 2018) is dated April 2013.<sup>52</sup> According to Kvinna till Kvinna’s country page on Azerbaijan (last updated in June 2016 as of February 2018),

“Several of The Kvinna till Kvinna Foundation’s partner organisations in Azerbaijan are cooperating with Armenian women’s organisations to create opportunities for dialogue between women affected by the Nagorno-Karabakh conflict. In general it is very difficult for Azerbaijanis and Armenians to meet or to talk about the conflict... Through an EU-funded project Kvinna till Kvinna’s partner organisations in Armenia and Azerbaijan also work to prepare women for participation in official peace processes, as well as conflict resolution.”<sup>53</sup>

No details are provided on how and where this cross-conflict cooperation takes place. According to



an interview with a Kvinna till Kvinna coordinator, the organisation has three mentors in Armenia, Azerbaijan, and NK, who facilitate mentoring activities, dialogue, and gender-related research.

## VI. CONCLUSION

The EU continues to avoid any direct engagement with NK and the peace process, largely due to sensitivities and limitations related to the question of recognition - although the EU is nevertheless active in other territories with a similar legal status. The EU's EPNK and PeaCE programmes were initiated for the specific purpose of overcoming these difficulties by engaging civil society and facilitating cross-conflict dialogue.

As shown in this report, these efforts have been inadequate, failing to meet their stated objectives or to contribute meaningfully to the peace process. In fact, the implementation of EPNK has corresponded with an increase in inflammatory rhetoric and skirmishes, culminating in a renewed round of hostilities in April 2016.<sup>54</sup> So long as these inadequacies remain unaddressed, the EU will most likely not promote other peacebuilding efforts in the region, leaving room for other international actors - first and foremost Russia - to fill the vacuum.

As direct cross-conflict engagement is extremely difficult to facilitate in the context of Nagorno-Karabakh, the use of social media and other online platforms seems a reasonable alternative in the attempt to break down barriers. However, while EPNK has reportedly launched a number of social media initiatives and online networks, these have poor outreach and have achieved little to no visibility – an essential condition for any potential impact.

Beyond highlighting these programmes' shortcomings, the findings presented in this report reflect structural issues in the EU's funding policies and more generally in its relationship with NGOs. The EU appears to have relied on NGOs' perceived expertise before commissioning the same NGOs to implement the very policies they had recommended. The circular nature of the policy-making and evaluation process results in the EU overlooking obvious impediments and subsequently failing to adequately oversee the programme's implementation.

It is unknown whether these findings reflect unintended consequences, abuse of trust on behalf of one or more of the parties, or political backscratching. It appears, however, that the EU's existing mechanisms for engagement with NGOs and external action fall short in terms of due diligence and oversight.

## ENDNOTES

- 1 [https://eeas.europa.eu/headquarters/headquarters-homepage/426/conflict-prevention-peace-building-and-mediation\\_en](https://eeas.europa.eu/headquarters/headquarters-homepage/426/conflict-prevention-peace-building-and-mediation_en)
- 2 <http://epnk.org/>
- 3 <http://epnk.org/partners>
- 4 See EUR-Lex, <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52011SC1000>; International Alert, [http://www.international-alert.org/sites/default/files/ToR final evaluation EPNK.pdf](http://www.international-alert.org/sites/default/files/ToR%20final%20evaluation%20EPNK.pdf); EU Financial Transparency System, [http://ec.europa.eu/budget/fts/index\\_en.htm](http://ec.europa.eu/budget/fts/index_en.htm)
- 5 EuropeAid, [http://ec.europa.eu/europeaid/files/iati/XI-IATI-EC\\_FPI\\_C\\_QSA.xml](http://ec.europa.eu/europeaid/files/iati/XI-IATI-EC_FPI_C_QSA.xml)
- 6 [https://eeas.europa.eu/delegations/armenia/25540/grants-opportunities-peacebuilding-through-capacity-enhancement-and-civic-engagement-peace\\_en](https://eeas.europa.eu/delegations/armenia/25540/grants-opportunities-peacebuilding-through-capacity-enhancement-and-civic-engagement-peace_en)
- 7 <http://bucharest.mfa.gov.az/content/38>
- 8 USC Institute of Armenian Studies, <https://armenian.usc.edu/focus-on-karabakh/highlight/russia-calls-azerbaijans-ban-ethnic-armenians-savagery/>
- 9 <https://www.halotruster.org/minefreenk/our-role-in-nagorno-karabakh/>
- 10 <http://www.css.ethz.ch/content/dam/ethz/special-interest/gess/cis/center-for-securities-studies/pdfs/CAD-51-52.pdf#page=21>
- 11 EU Neighbours East, [https://www.euneighbours.eu/sites/default/files/publications/2017-10/EUNEIGHBOURSeast\\_AnnualSurvey-2017report\\_AZERBAIJAN\\_0.pdf#page=10](https://www.euneighbours.eu/sites/default/files/publications/2017-10/EUNEIGHBOURSeast_AnnualSurvey-2017report_AZERBAIJAN_0.pdf#page=10), [https://www.euneighbours.eu/sites/default/files/publications/2017-10/EUNEIGHBOURSeast\\_AnnualSurvey2017report\\_ARMENIA.pdf#page=10](https://www.euneighbours.eu/sites/default/files/publications/2017-10/EUNEIGHBOURSeast_AnnualSurvey2017report_ARMENIA.pdf#page=10)
- 12 European Parliament Policy Department, [http://www.europarl.europa.eu/cmsdata/133502/EU relations with Armenia and Azerbaijan.pdf](http://www.europarl.europa.eu/cmsdata/133502/EU_relations_with_Armenia_and_Azerbaijan.pdf) analysis, p. 22, 25; see also Eurasia Daily Monitor, the Jamestown Foundation, <https://jamestown.org/program/azerbaijans-relations-with-minsk-group-hit-new-low/>
- 13 European Peacebuilding Liaison Office, <http://eplo.org/activities/project-archive/initiative-peacebuilding/>
- 14 <https://www.yumpu.com/en/document/view/38326628/the-nagorno-karabakh-conflict-initiative-for-peacebuilding>, p. 13.
- 15 <https://www.ictj.org/sites/default/files/ICTJ-IFP-EU-Mediation-Dialogue-2009-English.pdf>, p. 16.
- 16 EUR-Lex, <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52011SC1000>
- 17 International Alert, [http://www.international-alert.org/sites/default/files/ToR final evaluation EPNK.pdf](http://www.international-alert.org/sites/default/files/ToR%20final%20evaluation%20EPNK.pdf)
- 18 [http://eplo.org/wp-content/uploads/2017/02/CSDN\\_Geographic-meeting\\_Nagorno-Karabakh\\_Report.pdf](http://eplo.org/wp-content/uploads/2017/02/CSDN_Geographic-meeting_Nagorno-Karabakh_Report.pdf)
- 19 [http://ec.europa.eu/budget/fts/index\\_en.htm](http://ec.europa.eu/budget/fts/index_en.htm)
- 20 <http://www.epnk.org/>
- 21 <http://www.epnk.org/about-us/our-goals>
- 22 <http://www.epnk.org/about-us/how-we-make-difference>
- 23 <http://www.epnk.org/regional-grants-initiative>
- 24 <http://www.epnk.org/project-highlights>
- 25 <http://www.epnk.org/project-highlights/importance-confidence-building-measures-resolution-karabakh-conflict-stressed>; <http://www.epnk.org/project-highlights/importance-confidence-building-measures-resolution-karabakh-conflict-stressed>
- 26 <http://www.epnk.org/project-highlights/relaunch-unheard-voices-media-project>; <http://www.epnk.org/project-highlights/young-researchers-gather-minsk-methodological-training>; <http://www.epnk.org/project-highlights/confidence-building-measures-are-important-tool-support-peace-karabakh-not>
- 27 Veliyev, Jehun, Assessing the Impact of NGO Peacebuilding Programs in the South Caucasus: The Case of Nagorno-Karabakh, Central Asia Fellows Paper204, March 2018.
- 28 <http://www.icnl.org/research/monitor/azerbaijan.html>
- 29 Dissolution notice, <https://www.ngo-monitor.org/nm/wp-content/uploads/2018/07/LINKS-liquidation.pdf>; Certificate of incorporation, <https://www.ngo-monitor.org/nm/wp-content/uploads/2018/07/LINKS-reincorporation.pdf>. Documents downloaded from UK Companies House.
- 30 UK Companies House, <https://beta.companieshouse.gov.uk/company/03402701/officers>
- 31 Financial reports downloaded from UK Companies House: <https://www.ngo-monitor.org/nm/wp-content/uploads/2018/07/LINKS-2008.pdf>, <https://www.ngo-monitor.org/nm/wp-content/uploads/2018/07/LINKS-2009.pdf>, <https://www.ngo-monitor.org/nm/wp-content/uploads/2018/07/LINKS-2010.pdf>, <https://www.ngo-monitor.org/nm/wp-content/uploads/2018/07/LINKS-2014.pdf>, <https://www.ngo-monitor.org/nm/wp-content/uploads/2018/07/LINKS-2015.pdf>, <https://www.ngo-monitor.org/nm/wp-content/uploads/2018/07/LINKS-2016.pdf>
- 32 <http://www.icyf-dc.org/about-us/history/>
- 33 [http://commonsplace.eu/index.php?m=23&news\\_id=3882](http://commonsplace.eu/index.php?m=23&news_id=3882)

- 34 <https://beta.companieshouse.gov.uk/company/03402701/filing-history>
- 35 <http://www.epnk.org/partners/links>
- 36 <http://www.commonspace.eu/>; <https://www.facebook.com/commonspace.EU/>
- 37 [http://www.epc.eu/about\\_council.php](http://www.epc.eu/about_council.php)
- 38 <http://www.epnk.org/partners/international-alert>
- 39 <http://www.international-alert.org/where-we-work/caucasus/nagorny-karabakh-conflict>
- 40 <https://www.instagram.com/envisioningpeace/>
- 41 <https://www.facebook.com/unheardvoices.intalert/>; <https://twitter.com/UnheardVoicesLA>
- 42 [https://jam-news.net/?page\\_id=51751](https://jam-news.net/?page_id=51751)
- 43 [https://jam-news.net/?page\\_id=51751](https://jam-news.net/?page_id=51751)
- 44 <http://cmi.fi/wp-content/uploads/2017/05/cmi-ar-1page.pdf#page=28>
- 45 <http://cmi.fi/wp-content/uploads/2017/05/cmi-ar-1page.pdf#page=28>
- 46 <https://www.youtube.com/watch?v=M3DxALDuBJI>
- 47 <http://www.c-r.org/where-we-work/caucasus/karabakh-contact-group-0>
- 48 <http://www.epnk.org/project-highlights/karabakh-contact-group-meeting-washington>
- 49 <http://www.c-r.org/downloads/755%20CR%20Caucasus%20Report%202014%20WEB.pdf#page=10>
- 50 <http://www.c-r.org/where-we-work/caucasus/karabakh-contact-group-0>
- 51 <http://www.epnk.org/partners/kvinna-till-kvinna>
- 52 <http://thekvinnatillkvinnafoundation.org/region/southcaucasus/>
- 53 <http://thekvinnatillkvinnafoundation.org/country/azerbaijan/the-womens-movement/>
- 54 [http://eufoa.org/wp-content/uploads/2017/09/AliyevWarThreats\\_update\\_31.12.2017.pdf](http://eufoa.org/wp-content/uploads/2017/09/AliyevWarThreats_update_31.12.2017.pdf)