

STUDY

Requested by the AFET committee



The Scope and Mandate of EU Special Representatives (EUSRs)



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ABSTRACT

The present study aims to assess the scope and mandate of EU Special Representatives (EUSRs) in an attempt to explore and provide an analysis on the role of this diplomatic instrument of the European Union, especially in light of the changes to the conduct of EU external action brought about by the Treaty of Lisbon, reflected in the creation of the European External Action Service and European Union Delegations. By doing so this study not only provides an update on the role of EU Special Representatives in the EU's external action, but also looks forward by assessing their added value and the potential of their further institutional integration.

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List of Abbreviations

AFET: European Parliament's Committee on Foreign Affairs

BiH: Bosnia and Herzegovina

CEOS: Conditions of Employment of Other Servants

CFSP: Common Foreign and Security Policy

CSDP: Common Security and Defence Policy

EEAS: European External Action Service

ENP: European Neighbourhood Policy

EP: European Parliament

EU: European Union

EUBAM: European Union Border Assistance Mission

EUCAP: European Union Capacity Building Mission

EUD: European Union Delegation

EUMM: European Union Monitoring Mission

EUPOL: European Union Police Mission

EUSR: European Union Special Representative

EUTM: European Union Training Mission

FPI: Service for Foreign Policy Instruments

FYROM: Former Yugoslav Republic of Macedonia

HR/VP: High Representative of the Union for Foreign Affairs and Security Policy/Vice President of the European Commission

IHL: International Humanitarian Law

MEPP: Middle East Peace Process

MFF: Multiannual Financial Framework

NATO: North Atlantic Treaty Organisation

NDICI: Neighbourhood, Development and International Cooperation Instrument

OSCE: Organisation for Security and Co-operation in Europe

PSC: Political and Security Committee

SAA: Stabilisation and Association (Agreement/Process)

TFEU: Treaty on the Functioning of the European Union

TEU: Treaty on European Union

Executive Summary

The present study assesses the scope and mandate of EU Special Representatives (EUSRs) in an effort to explore and analyse the role of this specific diplomatic tool in EU external action. Especially in light of the changes brought about by the Treaty of Lisbon and reflected in the creation of the European External Action Service and the EU Delegations, the **position of EUSRs in the EU's external action** merits further analysis. Against this background and the existing literature, this study sheds new light on the **function, accountability and added value** of current EUSRs.

Rather than providing a comprehensive analysis of all EUSRs so far and the evolution of the position since the first EUSR appointment in 1996, this study focuses predominantly on the current 8 EUSRs and aims to be concise and forward-looking. In order to do so, this study primarily draws upon a set of **21 semi-structured interviews conducted in October and November 2018**, in view of complementing and updating the existing literature on the topic as well as previous studies conducted by, or for, EU institutions².

The study starts by briefly presenting the **legal framework** of the EUSR position, including its functions and competences. Accordingly, chapter two provides a comparison and **discussion of current EUSR mandates**, identifying aspects of similarity and difference, and some key overarching characteristics of EUSR mandates and their policy objectives. This discussion also includes a description and analysis of **EUSR budgets and financial arrangements**.

The following chapter focuses on the **legitimacy and accountability** of EUSRs. It aims to contribute to the understanding of what feeds into a legitimate role for EUSRs in the EU's external action. To this end, this chapter looks into which actors and institutions play a role in the legitimisation of EUSRs. Moreover, it elaborates on how accountability mechanisms for **monitoring, controlling and scrutinising** EUSR activities are currently practiced. Finally, this chapter also reflects on how the actual performance of EUSRs feeds into the legitimacy of EUSRs on the ground and, more broadly, to the EU's external action as a whole.

Subsequently, the study elaborates on the **added value** that EUSRs bring to the EU's external action. The EUSR proves to be a unique tool in view of the benefits related to the position and mandate on the one hand, and those related to the personality of the individual holding the mandate on the other. **Position- or mandate-specific** benefits include the position's political clout, EUSRs' multifaceted flexibility, their presence on the ground and regional approach.

Given the large window for pro-activeness and personal judgement granted by the position and mandates, **personalities** also greatly determine EUSRs' added value. Particularly their senior expertise, diplomatic weight, networking abilities and coordination skills contribute to EU foreign policy and strategy formation. Taken together these two aspects (position/mandate and personality) reveal the added value of EUSRs to other existing EU actors and instruments.

In a final chapter, this study explores **ongoing discussions on the future of the EUSRs' position** in the EU's external action, reflecting on the focus, location and profile of EUSRs. In addition, the desirability of the practice of double-hatting and the establishment of a Shared Service Centre are also discussed.

The general conclusion is that the **EUSR instrument is a valuable CFSP tool** which does not require fundamental or immediate modification. Moreover, there is an overall appreciation for the work of the current EUSRs among the different EU institutions. One of the key added values of the deployment of EUSRs is indeed their flexibility, which is the result of their unique 'free flowing' position in the EU's institutional framework, their specific budget and their vague legal framework and mandates. This **flexibility** should therefore be maintained. However, in order to improve the legitimacy of the EUSRs, the transparency of

their appointment procedure and their reporting duties need to be improved, in particular vis-à-vis the European Parliament.

Taking into account the diversity among EUSRs and their mandate areas, this study concludes with concise and tailor-made **policy recommendations** regarding the mandates and functions of current EUSRs, their appointment and selection, and their institutional integration. These recommendations are primarily based on insights gained by the authors of this study and suggestions raised by interviewees, while also drawing upon propositions made within existing literature.

1. Objectives and Methodology of the Study

1.1 Introduction

The present study aims to **assess the scope and mandate of EU Special Representatives (EUSRs)** in an attempt to explore and provide an analysis on the role of this diplomatic instrument of the European Union (EU or Union), especially in light of the changes to the conduct of the EU's external action brought about by the Treaty of Lisbon and reflected in the creation of the European External Action Service (EEAS) and EU Delegations (EUDs).

Having been at the disposal of the Council since 1996 and currently, in a post-Lisbon context, also under the direct authority of the High Representative of the Union for Foreign Affairs and Security Policy/Vice President of the European Commission (HR/VP), **EUSRs constitute a peculiar entity within a particular institutional setting** that merits further analysis. This study aims to shed light on the practice of EUSRs, focusing on their functions, legitimacy and added value.

Being **one of the oldest tools of the Common Foreign and Security Policy (CFSP)** (see 2.2), EUSRs are considered an important instrument to attain the Union's declared objectives and increase its visibility in a diverse set of mandate areas including regions, countries and topics. They aim to contribute to the exercise of EU diplomacy and the realisation of the EU's policy objectives in its external action by representing, communicating, mediating and networking on behalf of the EU. To this end and based on the changes brought about by the Lisbon Treaty, EUSRs are meant to **work and cooperate in conjunction with the HR/VP** and her cabinet, as well as the EEAS at large, including EU Delegations on the ground. At the same time, EUSRs maintain a prominent relationship with the Council, especially the Political and Security Committee (PSC). This institutional embeddedness gives EUSRs a **substantial level of flexibility in the exercise of their functions**.

Since the Treaty of Lisbon, more attention has been given to ensuring the functional integration of EUSRs within the EEAS so as to improve coordination and coherence. The important role of EUSRs has more recently been **highlighted in the EU's Global Strategy for Foreign and Security Policy** as contributing to one of the five broad priorities of the EU's external action, namely that of 'An Integrated Approach to Conflicts and Crises'¹.

It is against this background and the existing literature on EUSRs that this study attempts to provide an update on the scope and mandate of EU Special Representatives, one that reflects not only on the work of EUSRs but also tries to be forward-looking by assessing their added value and potential further institutional integration.

¹ 'EU Global Strategy for Foreign and Security Policy – Shared Vision, Common Action, A Stronger Europe', June 2016.

1.2 Objectives

Three overarching aims, each with specific objectives to be addressed, guide the research conducted in this study (see also Figure 1).

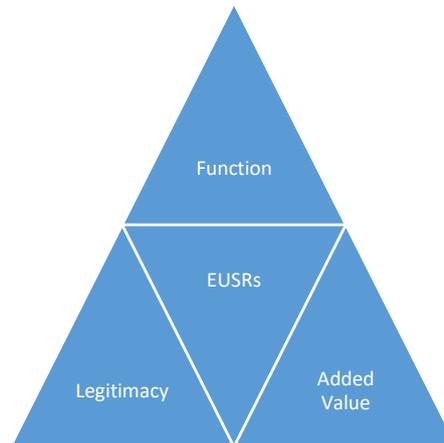


Figure 1: Function, Legitimacy and Added Value of EUSR's

First, this study will look into the EUSR's functioning, more specifically **the scope and mandate of the action that EUSR's** are meant to perform in their daily diplomatic duties, as well as the financial support that EUSR's receive from the EU. As every EUSR's work is based on a special mandate, which expires or is eventually renewed after a certain period of time, it is crucial to study the contents of these mandates, especially in view of the geographical and thematic settings, and consider the overall objectives and the specific range of tasks that EUSR's are meant to carry out. Therefore, after briefly analysing the legal framework for EUSR's (2.1), an overview of the current EUSR's is provided (2.2). Then the objectives and the key responsibilities of EUSR's, as codified in the current EUSR mandates, are explored (2.3). Relatedly, we analyse how EUSR's are financially supported, including the nature of the budget (2.4).

To this end, the study will look into the following aspects of the EUSR's:

- The legal framework of EUSR's, as laid down in the Treaties and guidelines adopted by the Council,
- An overview of the current EUSR's,
- An overview of the key objectives and responsibilities of the mandates of the current EUSR's,
- The budget of the EUSR's.

Subsequently, this study will focus on the **legitimacy and accountability of EUSR's**. As an instrument co-owned by Member States and the HR/VP, EUSR's display an operational and institutional anchoring that requires further assessment as it is not fully defined. More specifically, the study looks into how the particular institutional constellation shapes the legitimacy of EUSR's and how this relates to issues of oversight and accountability. Accordingly, the study will reflect on the following points:

- Institutional anchoring of EUSR's and the role of different institutions on issues such as the mandate and actions of EUSR's
- Role of the institutions on issues such as oversight and political accountability

Finally, this study will reflect on the **added value brought about by the existence and actions of EUSR's**. As mentioned before, EUSR's are a unique tool in external relations and belong to the oldest foreign policy instruments of the EU, which makes them particularly interesting tools to assess in terms of their added

value and contributions to the EU's external action. Based on an identification of two types of added value, i.e. position/mandate- and personality-related added value, we will explore how these features of EUSRs play an important role for the EU's external action and how they **complement existing institutions and instruments**. Whereas the position- and mandate-related added value relates to the political clout of EUSRs, their flexibility, presence on the ground and contribution to the EU's regional approaches, the personality-related added-value relates to EUSRs' senior expertise and diplomatic weight, privileged access, outreach and facilitating dialogue function as well as policy contribution and agenda setting.

In addition, the study concludes with a **discussion on the future of the EUSRs'** position in EU external action with the attempt to formulate suggestions on the basis of their identified added value. Accordingly, Section 4 and 5 will consider the following aspects:

- Added value of EUSRs to EU External Action in itself and vis-à-vis other EU institutions
- Forward-looking discussion on the future of the EUSR position

Lastly, the study will draft a number of **recommendations** for EU institutions, including the Council, the Commission and the European Parliament. The recommendations follow from what was analysed in each chapter and **concentrate on potential ways of improving and reforming the EUSR** as a particular instrument in the EU's Common Foreign and Security Policy, especially with regards to EUSRs' particular mandate, scope, legitimacy and overall added value in the wider context of EU external action.

1.3 Methodology

This study builds on empirical data gathered specifically for the purpose of the assessment at hand and comprehensive desk research carried out on primary and secondary sources related to the topic. **Twenty one semi-structured interviews** were carried out in October and November 2018, with various EU officials working at the EEAS, the European Commission and the European Parliament. Interviewees were selected so as to provide the current study with a broad range of perspectives and insights on the role of EUSRs in the larger system of EU external action. Accordingly, interviewees were chosen based on the connection and linkages between their areas of expertise and the work of EUSRs. Last but not least, several **EUSRs were interviewed** to complement the picture provided by other interviews and to self-assess their performance in the EU's external action. The content of all interviews informed the study's assessment of EUSRs throughout the subsequent analysis.

Interviews were conducted in a **semi-structured way**, in order to allow for the inclusion of each interviewee's specific expertise and background. Moreover, a fixed set of questions was used for all interviews, which addressed both issues of a general nature, as well as institution-specific ones, with the aim of providing as comprehensive a picture as possible about the current state of affairs.

This study complements and builds further on **previous studies conducted** by, or for, the EU institutions². Rather than having the ambition to give a comprehensive overview of all EUSRs which have served in the context of CFSP, this study mainly focuses on the current EUSRs by looking at their mandates, legitimacy and how their performance on the ground is perceived, with the overall aim to provide a forward-looking assessment for the future generation of EUSRs.

² A study of the EUSR System has been conducted by an independent team of experts (contracted by the European Commission's Foreign Policy Instrument) in 2015 (A. Sherriff, et al., Study of the EUSR System, 4 September 2015). This technical study complemented the political study on EUSRs that was conducted for the EEAS by the former Executive Secretary General of the EEAS Pierre Vimont (P. Vimont, Note for the attention of Alain Le Roy, Secretary General of the EEAS, Brussels, 17 July 2015). Both documents are on file with the authors.

2. The legal framework, mandate and function of EUSRs

2.1 The Legal Framework of EUSRs

The legal framework for EUSRs has changed little since the appointment of the first EUSR in 1996, Aldo Ajello, who was deployed to the Great Lakes Region in Africa³. At that time, the practice of posting EUSRs did not have a specific legal basis in the Treaties and even preceded the creation of the office of HR for CFSP by the Treaty of Amsterdam. The appointment of EUSRs was in this period only in the hands of the Council. The first **EUSRs were appointed to engage in conflict resolution** on behalf of the EU and to increase the EU's profile as an effective international actor⁴. Because these first EUSRs were considered as valuable assets in the EU's external relations toolbox and diplomatic presence, the function was soon codified in the Amsterdam Treaty⁵.

In order to maintain maximum flexibility, this **institutionalisation** was done in a particularly open-ended fashion. Article 18(5) TEU (Amsterdam Treaty version) stipulated that '[t]he Council may, whenever it deems it necessary, appoint a special representative with a mandate in relation to particular policy issues'. This provision remained largely unaltered throughout the subsequent Treaty revisions until the Treaty of Lisbon⁶, which aimed to **create a more coherent EU foreign policy** through, inter alia, the establishment of the EEAS, the HR/VP and the creation of EUDs instead of the former Commission Delegations. The Treaty of Lisbon kept the mandate for EUSR rather vague; as a result, the room of manoeuvre for policy-makers remained rather broad. The only change introduced by the Lisbon Treaty was in Art. 33 TEU, which stated that EUSRs are appointed by the Council 'on a proposal from the High Representative', under whose authority they now formally operate. Their mandate is set out in CFSP decisions based on Articles 31 (2) (the exception for the Council to vote by qualified majority instead of unanimity) and 33 TEU (see also 3.1).

The EUSR system is thus hardly governed by primary EU law. However, the gradual extension of the number of EUSRs and their scope went hand in hand with **a gradual regulation and institutionalisation**, especially through successive 'Guidelines on appointment, mandate and financing of EU Special Representatives', issued by the General Secretariat of the Council since 2000⁷. These guidelines provide EUSRs with a framework guiding their appointment and resignation, systematising their mandates, regulating links with the EEAS, the PSC and the Commission, introducing evaluation and review mechanisms, setting out financial principles and governing their security plan. Despite the fact that these are **rather non-binding documents**, adopted without the involvement of the Commission and European Parliament, the guidelines are the only instrument aiming to develop some general objectives, rules and procedures applicable to all the EUSRs.

These guidelines stress that the key objective of EUSRs is to contribute – assisted by the EEAS and acting in support of and close coordination with the Council and the HR – 'to the unity, consistency and effectiveness of the Union's external action and representation'. They should help ensure that all **Union instruments and Member States' actions are engaged consistently** to attain the Union's policy objectives. In particular, they should contribute 'to improving the effectiveness of the EU's response to

³ Joint Action 96/250/CFSP in relation to the nomination of a Special Envoy for the African Great Lakes Region (OJ, 1996, L87/1).

⁴ Grevi 2007.

⁵ Merket 2016.

⁶ The Nice Treaty left this mandate as it was but included the appointment of EUSR among the exceptions where the Council could vote by QMV instead of the general CFSP rule of unanimity (ex Article 23(2), current Article 31(2) TEU).

⁷ For the latest Guidelines, see General Secretariat of the Council, 'Guidelines on appointment, mandate and financing of EU Special Representatives', 11 March 2014, 7510/14.

crisis situations, and to the implementation of the EU's strategic policies'⁸. This seems to suggest that the focus of the EUSRs should be on policy coordination between different EU actors and policies in the mandate area.

EUSRs are appointed by the Council 'on a proposal from the High Representative' (Art. 33 TEU). Although from a strictly legal point of view the HR has the monopoly to propose an EUSR, the Council may also invite the HR to present a proposal for the appointment of an EUSR⁹. The PSC then assesses the proposal and may invite the competent Council Working Parties to examine the mandate, with a view to its adoption by the Council. In particular the RELEX Working Party assesses the legal, institutional and financial aspects of the mandate. Following an agreement in principle on appointing an EUSR, the **HR will invite the Member States via the PSC to propose candidates**. After the PSC endorses the recommendation regarding the nomination of an EUSR, the Council formally adopts the decision appointing and mandating the EUSR.

2.2 The current EUSRs

Since the appointment of the first EUSR in 1996 for the Great Lakes region, the number and geographical scope of **EUSRs gradually expanded**. Whereas the geographical focus was initially on Africa's Great Lakes region and the Middle East, EUSR missions were later expanded to new areas such as the Western Balkans (e.g. FYROM¹⁰, Kosovo¹¹, Bosnia and Herzegovina (BiH)¹²), Eastern Europe (Moldova)¹³ and the Southern Caucasus¹⁴, Central Asia¹⁵ and Africa (e.g. the Sahel¹⁶, the Horn of Africa¹⁷, the Southern Mediterranean region¹⁸).

With the creation of the EEAS and of EUDs as more political-diplomatic entities with larger political units acting on behalf of the Union towards third country partners, many **observers expected that the EUSRs would gradually be removed**. Indeed, realising that real control over EUSRs was in the hands of the Member States through the PSC, former HR/VP Catherine Ashton announced in a PSC meeting in 2010 that the mandates of a number of EUSRs were to be terminated by February 2011¹⁹. In her 2013 Review of the EEAS the HR/VP referred to the EUSR as an 'anomaly' in the Post-Lisbon structure for EU foreign policy and stressed the need for their incorporation in the EEAS, 'while retaining a close link to Member States via the PSC'²⁰. However, several Member States disagreed with this approach. While Ashton succeeded in

⁸ Ibid.

⁹ Ibid.

¹⁰ Council Joint Action 2001/492/CFSP appointing a Special Representative of the European Union in the Former Yugoslavia Republic of Macedonia (FYROM) (François Léotard) (OJ, 2001, L 180/1)

¹¹ Council Joint Action 2006/623/CFSP on the establishment of a EU-team to contribute to the preparations of the establishment of a possible international civilian mission in Kosovo, including a European Union Special Representative component (ICM/EUSR Preparation Team) (OJ, 2006, L 253/29).

¹² Council Joint Action 2002/211/CFSP on the appointment of the EU Special Representative in Bosnia and Herzegovina (Lord Ashdown) (OJ, 2002, L 70/7).

¹³ Council Joint Action 2005/265/CFSP appointing a Special Representative of the European Union for Moldova (Adriaan Jacobovits de Szeged) (OJ, 2005, L 81/50).

¹⁴ Council Joint Action 2003/496/CFSP concerning the appointment of an EU Special Representative for the South Caucasus (Heikki Talvitie) (OJ, 2003, L 169/74).

¹⁵ Council Joint Action 2005/588/CFSP appointing a Special Representative of the European Union for Central Asia (Ján Kubiš) (OJ, 2005, L 199/100).

¹⁶ Council Decision 2013/133/CFSP appointing the European Union Special Representative for the Sahel (Michel Dominique Reveyrand - De Menthon) (OJ, 2013, L 75/29).

¹⁷ Council Decision 2011/819/CFSP appointing the European Union Special Representative for the Horn of Africa (Alexander Rondos) (OJ, 2011, L 327/62).

¹⁸ Council Decision 2011/424/CFSP appointing a European Union Special Representative for the Southern Mediterranean region (Bernardino León) (OJ, 2011, L 188/4).

¹⁹ Fouéré 2016

²⁰ EEAS, EEAS Review, Brussels, 29 July 2013.

removing some EUSRs (e.g. the EUSR for the Great Lakes Region was terminated and the EUSRs for the south Caucasus and Georgia were merged), political developments in Africa and the Middle East since 2011 led the **Council to appoint new EUSRs** for, inter alia, the Southern Mediterranean, the Horn of Africa, Sahel, and the Middle East peace process.

The current HR/VP, Federica Mogherini, has shown **a more open-ended attitude towards EUSRs**. In a letter to the PSC in October 2015, she confirmed that she fully subscribed to the views expressed in the evaluation exercise she had undertaken on 'the usefulness of EUSRs as a flexible EU instrument to attain our political objectives and increase our visibility'²¹. However, during the mandate of Mogherini only one new EUSR position has been appointed (i.e. the reappointment of a EUSR for the Middle East Peace Process, after this position was terminated by Ashton).

Since the appointment of the first EUSR in 1996 **a total number of 20 EUSR positions** have been created. Since then, a total of 53 individuals have been appointed to different EUSR positions²². EUSR positions come and go but many of them have shown continuity as the average length of an EUSR position is almost seven years (the longest being the Great Lakes position which went on for nearly 17 years)²³. The **average duration of an EUSR mandate is around one year**. However, it seems that the Council is increasingly in favour of slightly longer mandates. For example, in June 2018 the Council extended the mandates of six of the eight current EUSRs for a period of 20 months²⁴. The average tenure for one person to hold a EUSR position was assessed by all interlocutors, including current EUSRs, as appropriate. Indeed, as several officials argued during interviews, if a person would occupy the office of a EUSR for too long, there would be the **risk that the EUSR would become too embedded in the political and diplomatic scene** of the mandate area, which is in particular the risk for double-hatted EUSRs and EUSR based in the mandate area (see section 5). However, a tenure of less than two years would be too short. First, it takes a while before an EUSR can properly start to 'function' since they have to personally set up their office, including staff, logistics and administration. One EUSR stated that 'there is nothing when you start'. Second, also the importance of a certain the degree of continuity was mentioned, both with regards to the mandate and when it comes to the EUSR staff.

EUSRs are being appointed for single countries, regions or thematic issues. As illustrated in Table 1, there are currently five 'regional' EUSRs (Horn of Africa; Central Asia; the Middle East Peace Process, the South Caucasus and the crisis in Georgia; and the Sahel)²⁵. There is currently **only one thematic EUSR**, which is the EUSR responsible for Human Rights²⁶. All interlocutors have recognised that this is a very useful position, in particular through the conduct of high-level political dialogue and capacity to reach out to high-level partners in very sensitive political environments. However, the question whether more thematic EUSRs, such as on migration, energy, climate change, cyber-security, nuclear proliferation, should be

²¹ Fouéré 2016.

²² Authors' own calculation.

²³ Sherriff 2015.

²⁴ These were Peter Burian's mandate as EUSR for Central Asia; Alexander Rondos' mandate as EUSR for the Horn of Africa; Nataliya Apostolova's mandate as EUSR in Kosovo; Ángel Losada Fernández's mandate as EUSR for the Sahel and Toivo Klaar's mandate as EUSR for the South Caucasus and the crisis in Georgia. Lars-Gunnar Wigemark's mandate as EUSR for BiH was extended for only 14 months (Council, 'Council extends the mandates of six EU Special Representatives', 25 June 2018.

²⁵ Council Decision (CFSP) 2018/905 extending the mandate of the European Union Special Representative for the Horn of Africa (OJ, 2018, L 161/16); Council Decision (CFSP) 2018/904 extending the mandate of the European Union Special Representative for Central Asia (OJ, 2018, L 161/12); Council Decision (CFSP) 2018/1248 appointing the European Union Special Representative for the Middle East Peace Process (OJ, 2018, L 235/9); Council Decision (CFSP) 2018/907 extending the mandate of the European Union Special Representative for the South Caucasus and the crisis in Georgia (OJ, 2018, L 161/27); Council Decision (CFSP) 2018/906 extending the mandate of the European Union Special Representative for the Sahel (OJ, 2018; L 161/22).

²⁶ Council Decision (CFSP) 2017/346 extending the mandate of the European Union Special Representative for Human Rights (OJ, 2018, L 50/66).

appointed triggered mixed reactions (see 5.1). Currently there are also **two country-specific EUSRs** (Kosovo and BiH)²⁷.

²⁷ Council Decision (CFSP) 2018/903 extending the mandate of the European Union Special Representative in Kosovo (OJ, 2018, L 161/7); Council Decision (CFSP) 2018/908 extending the mandate of the European Union Special Representative in Bosnia and Herzegovina (OJ, 2018, L 161/32).

Table 1: Overview of current EUSR mandates

	Bosnia and Herzegovina	Central Asia	Horn of Africa	Human Rights	Kosovo	Middle East Peace Process	South Caucasus and the crisis in Georgia	Sahel
Name EUSR	Lars-Gunnar Wigemark	Peter Burian	Alexander Rondos	Stavros Lambrinidis	Nataliya Apostolova	Susanna Terstal	Tovio Klaar	Ángel Losada
Nationality and Profile EUSR	Sweden - Former Swedish diplomat; former Head of Security Policy Unit at the European Commission and Head of EU Delegation Pakistan	Slovakia - Former State Secretary of the Ministry of Foreign and European Affairs and former ambassador of Slovakia to NATO, the UN and the US	Greece - Former senior officials in Prime Minister's office of Greece, diplomat and senior official at the World Bank	Greece - Former MEP and Vice-President of the European Parliament, Minister Foreign Affairs of Greece	Bulgaria - Bulgarian and EU Diplomat, former Ambassador and the Head of the EU Delegation in Tripoli and Deputy Head of EU Delegation in Cairo	Netherlands - Former Dutch Ambassador to Iran and Angola	Estonia - National diplomat and former Head of the Central Asia Division at the EEAS and Head of the EU MM Georgia	Spain - Spanish diplomat and former Special Envoy for Libya
Tenure current mandate	1 July 2018 -31 August 2019 (14 months)	1 July 2018 - 29 February 2020 (20 months)	1 July 2018 -29 February 2020 (20 months)	1 March 2017-28 February 2019 (24 months)	1 July 2018 - 29 February 2020 (20 months)	18 September 2018 - 29 February 2020	1 July 2018 - 29 February 2020 (20 months)	1 July 2018 - 29 February 2020 (20 months)
Type of mandate EUSR	Country-specific	Regional	Regional	Thematic	Country-specific	Regional	Regional	Regional
Location	EUD, Sarajevo, BiH	Brussels - EEAS HQ	Primarily in the region but regular presence at the EEAS HQ	Brussels - EEAS HQ	EU Office, Pristina, Kosovo	Brussels, EEAS HQ	Brussels, EEAS HQ	Brussels, EEAS HQ
Double-hatted	Yes	No	No	No	Yes	No	No	No
Link to specific EU Strategies	SAA Process	2007 EU Strategy for Central Asia (reviewed in 2015)	2016 Global Strategy; 2011 Strategic Framework for the Horn of Africa and the Regional Action Plan 2015-2020	2012 Strategic Framework on Human Rights and Democracy and the 2015-2019 Action Plan	-	-	-	EU Strategy for Security and Development in the Sahel (the 'Strategy') and its Regional Action Plan (the 'RAP')
CFSP/CSDP missions in the mandate area	EUFOR ALTHEA	No	EUCAP Somalia, EUTM Somalia, EU NAFVOR Atlanta		EULEX Kosovo	EUPOL COPPS, EUBAM Rafah	EUMM Georgia	EUCAP Sahel Niger, EUTM Mali, EUCAP Sahel Mali

Significantly, since the Treaty of Lisbon, all country-specific EUSRs have been appointed as **'double-hatted' EUSRs**, combining the position of EUSR with the Head of EU Delegation (EUD). Since the termination of the mandates for the EUSR for Afghanistan in 2017, the current two country-specific EUSRs have become the last double-hatted EUSRs. Indeed, it has been argued that after the Treaty of Lisbon such double-hatted EUSRs have become redundant, given the enhanced political mandate of (Heads of) EUD. As discussed below, HR/VP Mogherini even proposed to **phase out the remaining double-hatted EUSRs**, although some Member States are reluctant to do so, fearing a loss of control over a 'privileged ear', which the EUSRs provide through their direct reporting to the PSC²⁸.

2.3 The Mandates and functions of the Current EUSRs

2.3.1 The Policy Objectives of the Mandates

The different Council decisions appointing (or extending the mandate of) EUSRs all have a similar structure, in line with the 'Guidelines on appointment, mandate and financing of EU Special Representatives'. After formally appointing a specific person for the EUSR position (or extending his or her mandate) (Article 1), the Council decisions define the Union's policy objectives in relation to the mandate region or theme, on which the EUSR's mandate is based.

The policy objectives of the **two country-specific EUSRs in the Western Balkans** (i.e. Kosovo and BiH) are rather similar. These decisions state that the Union aims to create a 'stable, viable and peaceful, multi-ethnic and united' BiH and Kosovo and to contribute to regional cooperation in line with the Stabilisation and Association process. The Kosovo Decision also stresses the rule of law and the protection of minorities. Remarkably, despite that fact that these two countries have the same status as 'potential candidates for EU membership' in the context of the SAA process, only the BiH Decision explicitly refers to the aim to ensure 'that BiH is irreversibly on track towards EU membership'. The Kosovo Decision on the other hand just mentions Kosovo's 'European perspective and rapprochement with the Union'.

With regard to the regional EUSRs, **only the EUSR for the Horn of Africa refers to the relevant EU regional strategy to define the Union's policy objectives** (i.e. the 2011 Strategic Framework for the Horn of Africa and the Horn of Africa Regional Action Plan 2015-2020). The EUSR mandates covering ENP countries (i.e. the Middle East Peace Process (MEPP); and the South Caucasus and the crisis in Georgia) do not refer to the relevant ENP documents, while the mandate for Central Asia remains silent with regard to the 2007 EU Strategy for Central Asia (reviewed in 2015). The relevant (European) Council conclusions (e.g. for the EUSR South Caucasus and the crisis in Georgia) or UN Security Council Resolutions (e.g. for the EUSR MEPP) are instead being used to define the Union's policy objectives. In addition, all these mandates stress the Union's objectives of (i) strengthening regional cooperation; (ii) promoting human rights, fundamental freedoms, peace, security and development; (iii) coordination of all relevant instruments and actions of the Union's multi-faceted engagement in the region in order to enhance the Union's effectiveness and visibility; (iv) preventing conflicts or contributing to a peaceful settlement of conflicts in the region and (v) engaging constructively with the main interested actors regarding the region. The mandate for the Horn of Africa also underlines the importance of addressing the root causes of such flows and their humanitarian aspects.

The **objectives for the thematic EUSR Human Rights** (currently the only thematic EUSR), are based on the policy objectives of the Union regarding human rights as set out in the Treaties, the Charter of Fundamental Rights of the EU, as well as the EU Strategic Framework on Human Rights and Democracy and the EU Action Plan on Human Rights and Democracy. The focus is on enhancing the Union's effectiveness, presence and visibility in protecting and promoting human rights, democracy, the rule of

²⁸ Fouéré 2016.

law and good governance in the world, in particular by deepening Union cooperation and political dialogue with third countries, relevant partners, business, civil society and international and regional organisations. Moreover, the EUSR needs to contribute to the coherence of the Union's action on human rights and the integration of human rights in all areas of the Union's external action. It has to be noted that, although the EUSR for the MEPP is considered as a regional mandate, in practice it can also be seen as a 'single-issue mandate'. The focus of the MEPP mandate is one specific issue, i.e. the peace process between Israel and Palestine on the basis of a two-State solution, and not on a wide range of cross-regional issues as in the case of the other regional EUSR.

2.3.2 The function of the EUSRs based on the mandates

After defining the Union objectives vis-à-vis the mandate region, the respective Council decisions list the tasks (i.e. the actual 'mandate') for the EUSRs. **Each mandate has its specific focus.** For example, whereas the focus of the EUSR for Central Asia is on regional cooperation and conflict prevention, the mandates for the EUSRs for the Horn of Africa and the Sahel focus on stabilisation, conflict resolution and crisis management with regard to the different conflicts in these mandate areas. However, **all mandates of the current EUSRs have several responsibilities in common.**

First, although this is not always explicitly mentioned in the mandate, the EUSR needs to provide the EU institutions (i.e. the Commission and EEAS) and the national foreign ministers (through the Council and the PSC) with information about their mandate areas. The EUSRs have, therefore, often been depicted as the EU's 'ears and eyes' on the ground.²⁹ The EUSRs' reporting on the political developments in the mandate area is particularly important for Member States that do not have embassies in the EUSRs' mandate areas. In practice, **individual Member States obtain more information from EUSRs** during informal bilateral meetings with them (or with small groups of Member States), than in the official PSC meetings or written reports from the EUSR. Moreover, there are even a few countries in EUSR mandate areas where the EU does not have a Delegation (e.g. Turkmenistan)³⁰, meaning that also Commission and EEAS are heavily dependent on the EUSR.

Second, **EUSRs are to demonstrate the EU's interest and engagement in the mandate area and strengthen the visibility of the Union in the region.** In 2005 HR Javier Solana remarked that EUSRs are 'the visible expression of the EU's growing engagement in some of the world's most troubled countries and regions' and how 'the list of where we have EUSRs is, in part, also a list of where our foreign and security policy priorities lie'³¹. In the case of BiH, the EUSR is even explicitly tasked to 'coordinate and implement the Union's communication efforts on Union issues towards the public in BiH and promote the process of Union integration through targeted public diplomacy and Union outreach activities designed to ensure a broader understanding and support among the BiH public on Union-related matters'. Not surprisingly, ensuring the 'visibility of the Union's human rights policy' is one of the key tasks for the EUSR for Human Rights. In other mandates, the EUSR needs to contribute to the visibility of the EU and/or to the continued presence of the Union in relevant international organisations and fora (e.g. South Caucasus and the crisis in Georgia and the Sahel).

Third, EUSRs are asked to contribute **to the implementation of an EU policy and/or strategy towards the mandate area**, or to contribute to the formulation of a new strategy or policy. At the time that the first EUSRs were deployed, the EU did not yet have common strategies for various regions and issues. The EUSRs

²⁹ Grévi 2007.

³⁰ The EU only has a EU Liaison Office in Turkmenistan.

³¹ Council, Opening remarks of the EU High Representative for the CFSP, Seminar with EU Special Representatives, Brussels, 29 June 2005 (S239/05).

were then tasked to give input for the formulation of new EU strategies (i.a. those for Central Asia, the Great Lakes region in Africa, the Horn of Africa)³². The EU has now developed a specific strategy for half of the mandate areas or themes, explicitly referred to in the mandate (i.e. Central Asia, Human Rights, Horn of Africa, Sahel) (see Table 1), which the EUSR is tasked to implement. That being said, EUSRs play an **important role for the review of these strategies**. For example, the EEAS (together with the Commission) is preparing a new Strategy for Central Asia, to be published in 2019³³. EEAS officials and the current EUSR have recognised that the latter provides valuable input for the strategy, however, both have stressed that the drafting remains solely in the hands of the EEAS. Remarkably, whereas the mandates task the EUSRs to contribute to the implementation of their respective EU regional strategies, these strategies do not specify the role of the EUSR. At best, this role is recognised and appreciated (see for example the Horn of Africa Regional Action Plan 2015-2020)³⁴ without defining specific tasks. EEAS officials indeed noted that it is difficult to attribute an EUSR with a specific task in an EU strategy, as these documents often span a longer period of time than the duration of an EUSR's mandate.

Against this background, it remains remarkable that only the Council can define the mandate of the EUSR (Art. 33 TEU, see above), and not the institutions drafting the strategies that the EUSRs need to implement (i.e. the EEAS and the Commission)³⁵. In view of this, it could be argued that the role of EUSRs should be further specified in relevant regional EU strategies, in line with the Council's mandate for the EUSRs. In particular, specific Action Plans implementing broader strategies (e.g. the Regional Action Plan for the Sahel, the Action Plan for Human Rights and Democracy and Horn of Africa Regional Action Plan 2015-2020) could be clearer and more specific on the role of the EUSRs.

Fourth, **EUSRs are always mandated to contribute to a better coordination of EU activities** in their mandate areas. The Council decisions even include a specific article (i.e. Article 12) devoted to policy coordination. EUSRs need to contribute to the unity, consistency and effectiveness of the Union's action and 'shall help ensure that all Union instruments and Member States' actions are engaged consistently, to attain the Union's policy objectives'. They need to liaise with the Member States, the Commission, the relevant geographic department of the EEAS³⁶ and the Heads of the EUD in the mandate area. EUSRs are also tasked with coordinating with the Heads of Missions or the Mission/Force Commander of the CSDP mission in the mandate area. The EU deploys in almost every EUSR mandate area one or more CSDP missions (with the notable exception of Central Asia, see Table 1). EUSRs were initially integrated into the chain of command of the civilian operations. However, as some **Member States feared that CSDP missions could end up being absorbed into the political mandates of EUSRs**³⁷, they were taken out of the chain of command³⁸. The EUSRs are nowadays only mandated to give 'local political guidance' to the Heads of Mission or Force Commanders, such as on military issues with a local political dimension (e.g. EUSR BiH) or the political aspects of issues relating to executive responsibilities (e.g. EUSR Kosovo).

Fifth, all **EUSRs are expected to cooperate closely with key international actors in the field, like the UN and its agencies**, NATO, the OSCE and regional organisations like the African Union. In addition, the EUSR also needs to engage with other countries of influence within the mandate region. For example, the mandate for the EUSR for the Horn of Africa explicitly refers to the US, the countries of the Gulf, Egypt, Turkey and China and the Gulf Cooperation Council. The EUSR also needs to coordinate the representation

³² Tolksdorf 2015.

³³ See Council Conclusions on the EU strategy for Central Asia, 19 June 2017.

³⁴ Council, Council Conclusions on the EU Horn of Africa Regional Action Plan 2015-2020, 26 October 2015 (1320/15)

³⁵ It has to be noted that in most cases the Council adopts conclusions to endorse these strategies.

³⁶ Although only the mandate for the EUSR for Central Asia obliges the EUSR to coordinate with the relevant geographic department of the EEAS. In practice all the EUSR coordinate intensively with the relevant EEAS departments.

³⁷ Merket 2016.

³⁸ It is today the Civilian Operation Commander, who heads the Civilian Planning and Conduct Capability (CPCC) within the EEAS, who reports on the civilian CSDP missions.

of the EU in relevant international organisations or international conflict resolution mechanisms. In the case of the MEPP, the EUSR is even the Union's Envoy to the Quartet, and is in this capacity required to contribute to the preparation of Quartet Envoys meetings on the basis of Union positions and through coordination with other Quartet members.

Finally, all **EUSRs are tasked with actively engaging with all relevant actors at a local level**. The mandates are rather far-reaching in this regard and do not only refer to local authorities (executive and legislative), politicians and civil society, but even to political parties (EUSR BiH) and the judiciary (EUSR South Caucasus and Crisis in Georgia and Central Asia).

2.3.3 Budget of EUSRs

In contrast to the EEAS' activities, all administrative and operational expenditures resulting from **EUSRs' activities are funded out of the CFSP budget**, and thus not in the framework of the financing instruments for external action. Yet, just like external financing instruments, the CFSP budget – and therefore also the EUSR's expenditures – is administered by the Service for Foreign Policy Instruments (FPI). Although the FPI has to ensure that all expenditures are in accordance with the principle of sound financial management, EUSRs have some autonomy on how precisely they use their budgets and the budget is regarded by most EUSRs as sufficient.

The financial commitments set out in the respective EUSR mandates (i.e. the Council Decision) are further **detailed in a budgetary impact statement** drawn up on the basis of a draft prepared by the FPI, which is assessed by the RELEX Working Party with a view to approval by the Council, together with the respective Council decisions. The Budget Impact Assessments include details about staff costs, mission costs, running costs, capital costs and representation costs. The actual management of the expenditure is subject to a contract between the EUSR and the Commission. In the framework of this contract, the EUSR will be accountable to the Commission for all expenditure charged to the CFSP chapter in the EU budget³⁹.

For administrative purposes, the EUSR is recruited by the Commission as a Special Adviser in accordance with the Conditions of Employment of Other Servants (CEOS). Due to their varying tasks, the budgets of the EUSRs differ significantly from each other. In particular, the number and composition of the staff has a significant impact on the overall costs. The **EUSRs' teams may be composed of staff seconded by Member States or EU institutions**; international contracted staff who must have the nationality of an EU Member State; or local staff (Brussels-based or in a third country)⁴⁰. As seconded staff is paid by the 'referring' institution or Member State, EUSRs with a team composed mainly out of seconded staff require less budget.

The total EU budget for EUSRs in the financial year 2018 is **EUR 13 500 000** (commitments)⁴¹. Currently, the EUSRs with the largest budget are BiH (537 281 EUR per month) and Kosovo (257 500 EUR per month). The EUSRs for Human Rights (73 090 EUR per month) and Central Asia (83 000 EUR per month) have the smallest budget (see Table 2).

Finally, it has to be noted that the new multiannual financial framework (MFF) for 2021-2027, as proposed by the Commission, will have **no impact on the structure (i.e. source) of the EUSRs' budget**. The new MFF will integrate several of the current financial instruments for external action (in the Neighbourhood, Development and International Cooperation Instrument (NDICI)), however, the EUSRs will remain funded from the CFSP budget which is administered by the FPI.

³⁹ General Secretariat of the Council, 'Guidelines on appointment, mandate and financing of EU Special Representatives', 11 March 2014, 7510/14.

⁴⁰ Ibid.

⁴¹ Budget line 19 03 01 07, General budget of the European Union for the financial year 2018. Joint text: Amendments by budget line – Consolidated document (integration of agreed amendments on DB or Council's position).

Table 2: The budget of current EUSRs (commitments) (authors' own calculation)

	BiH	Central Asia	Horn of Africa	Human Rights	Kosovo	MEPP	South Caucasus and crisis in Georgia	Sahel
Period current mandate	1 July 2018 - 31 August 2019 (14 months)	1 July 2018 - 29 February 2020 (20 months)	1 July 2018 - 29 February 2020 (20 months)	1 March 2017- 28 February 2019 (24 months)	1 July 2018 - 29 February 2020 (20 months)	18 September 2018 - 29 February 2020	1 July 2018- 29 February 2020 (20 months)	1 July 2018 - 29 February 2020 (20 months)
Total budget current mandate (EUR)	7 521 937	1 660 000	4 295 000	1 754 178	5 150 000	1 730 000	4 340 000	2 400 000
Average monthly budget of current mandate (EUR)	537 281	83 000	214 750	73 090	257 500	98 857	217 000	120 000

3. EUSRs' Legitimacy and Accountability in EU External Action

This section focuses on the legitimacy and accountability of EU Special Representatives. It is important to focus on these two aspects of the EUSRs' work in order to understand and analyse what feeds into a **legitimate role that EUSRs play in EU external action**. Moreover, it is important to understand how monitoring, controlling and scrutinising the work of EUSRs is currently practiced in the EU. This sheds light on the **institutional capacity to hold EUSRs accountable**.

3.1 EUSRs' Legitimacy and Accountability

Legitimacy can be understood along the lines of what has been called **input-, throughput and output-legitimacy**⁴². In a nutshell, **the legitimacy of EUSRs** can be defined by the direct or indirect input that constituents, such as Member States or EU citizens, have on their selection and appointment (input legitimacy), the process and practice leading to their appointment (throughput legitimacy) and the question if EUSRs actually carry out their mandates efficiently and with added value for EU external action as a whole (output legitimacy).

The overall creation, selection, appointment and action of EUSRs must be seen as legitimate within the EU and its foreign policy community⁴³. For this to take place, clear links between the authorising institutions and the selected and appointed EUSRs must be established. EUSRs should derive their legitimacy from legitimate selection processes and implementation oversight procedures linked to their selection and daily activities⁴⁴. Ideally, **EUSRs should be able to rely on such procedures and processes** as critical feedback and signs of support in their daily work on the ground. Finally, EUSRs may have to meet what is called output-legitimacy⁴⁵. This form of legitimacy is generated by their added value and policy-making capacity, in other words by their **ability to effectively and efficiently fulfil their mandates** (see 4.1).

EUSRs are appointed in the framework of the CFSP. At present the CFSP can be seen as an **intergovernmental island** of sorts within the EU, in which Member States are reluctant to pool their sovereignty at the EU level as they have in other policy areas of the Union. Hence, the intergovernmental character of the CFSP underlines the need for coordination amongst Member States, unanimous decision-making in the Council and, relatedly, the overall influence of Member State governments in the Council, which – after all – determine the outcomes and decisions in CFSP matters. Its intergovernmental nature also implies that decisions in CFSP can only be considered acceptable if they ultimately derive from the **Member States as a source of (input) legitimacy**. At the same time, CFSP has seen changes over time. Due to a greater need for effectiveness, majority voting has gradually complemented unanimous decisions in the Council. Moreover, in an effort to reach a coherent and effective EU external action, the HRVP was introduced to the system of CFSP through the Lisbon Treaty. The HRVP has been dubbed 'multi-hatted' in her function as High Representative of CFSP/CSDP, Chair of the Foreign Affairs Council, Head of the European External Action Service and Vice President of the European Commission. Appointed by the European Council and confirmed by the European Parliament as a member of the college of Commissioners, her **legitimacy does not only derive from the Member States** in the European Council, but also from EU citizens that directly elect the European Parliament. While the HRVP is not an ultimate decision-taker and legislator in CFSP, she can influence CFSP substantially, including through her right to initiate CFSP policies as High Representative of CFSP, by chairing the Foreign Affairs Council, and through her position as Head of the EEAS, where she coordinates and implements EU external action.

⁴² Schmidt 2013.

⁴³ Raube and Tonra 2018.

⁴⁴ Ibid., see also Raube and Tonra 2018.

⁴⁵ Ibid.

Both the Council and the HRVP are important actors in the selection of EUSRs. As mentioned above (see 2.1), Article 33 TEU stipulates that ‘the Council may, on a proposal from the High Representative of the Union for Foreign Affairs and Security Policy, appoint a special representative with a mandate in relation to particular policy issues.’ Article 31 TEU adds that **EUSRs are appointed by qualified majority voting in the Council**, a derogation from the overarching rule that decisions on CFSP matters are to be decided by unanimity in the Council (see also 2.1). Once appointed, EUSRs operate under the authority of the HR/VP, as stated in Article 33 TEU: ‘The special representative shall carry out his mandate under the authority of the High Representative.’

What is interesting with regard to Article 31 and 33 TEU is that the **legitimacy of EUSRs is derived from the proposal of the HR/VP and the appointment of the Council**. This may give the impression that EUSRs rely in the first place on the support of the HR/VP. However, the selection and appointment process is in fact conducted as a joint-exercise between the HR/VP and the Council, underlining the importance of the Member States. The final decision is taken by qualified majority voting given that the HRVP officially initiates the procedure. As mentioned before, the procedure for EUSR appointments is regulated in the Treaty. The process of selecting candidates follows an established procedure, which is explained in greater detail in Part 4.2.2. However, given the **discretion of the HR/VP in the selection process**, it is often claimed that the final decision often remains unclear in view of why particular candidates are chosen. In other words, while the formal proposal and decision are clearly mentioned in the treaty, the process of selecting is rather underspecified and potentially questioning the (throughput) legitimacy of the respective candidates. At the same time, it may be argued that the HRVP will need some degree of discretion given the distinctively diplomatic and intergovernmental nature of the EUSRs.

Implementation and reporting of EUSRs is, according to the Treaty, clearly foreseen for the HR/VP (‘mandate under the authority of the High Representative’). And yet, not only do EUSRs report directly to the HR/VP, but more broadly their work is embedded in the EEAS structure (e.g. geographical desks at Brussels’ headquarters and EUDs) and the relevant Council committees and Working Groups, which are also overseen by the HR/VP. It should be noted that, given its central coordinating role in the Council, the **PSC Chair can be seen as a central coordinator of all EUSRs**. Overall, therefore, the assessment of whether EUSRs carry enough added value towards the effectiveness of EU external action (output-legitimacy), lies in the hands of the HR/VP and the Council, who eventually oversee and decide whether a mandate needs to be prolonged or rather terminated.

At first sight, there seems to be only limited room for the **participation of other legitimatising actors** and processes, let alone accountability procedures, outside the realm of the HRVP, EEAS and Council. Article 31 and 33 TEU do not mention the EP explicitly in this regard. However, Article 36 TEU stipulates that ‘special representatives may be involved in briefing the European Parliament’. Complementing Article 36, the EP further clarifies in its Rules of Procedure the relationship with EUSRs. Moreover, the EP won concessions by the HR/VP in the context of the establishment of the EEAS in 2011⁴⁶, which led to the Declaration on Accountability signed by the HR/VP in 2011⁴⁷. This Declaration further specifies the role of the EP with regard to the EUSRs’ accountability.

In its Rules of Procedure, the **EP may send questions to the Council** regarding ‘the objectives and other relevant matters relating to the tasks and role to be performed by the special representative’⁴⁸, when the Council intends to appoint an EUSR. Both the Declaration of Accountability and the Rules of Procedure specify that newly appointed EUSRs, which are regarded as ‘strategically important’, should appear in

⁴⁶ Raube 2012.

⁴⁷ DCA, Rule 5: EP Rules of Procedure (Rule 110).

⁴⁸ Rules of Procedure (Rule 110).

parliament following their appointment, but 'before taking up their positions'⁴⁹. The HR/VP also agreed in the **Declaration of Accountability** to respond positively to such request. The same procedure has been established for Heads of Delegation and the exchange of views normally takes place 'in camera'⁵⁰. The EP's Rules of Procedure also specify that after such hearing, the **EP can make recommendations to the Council, the Commission and the HR/VP**. And, in terms of the follow-up and implementation of EUSR mandates, the EP's Rules of Procedure specify that special representatives 'shall be invited to keep Parliament fully and regularly informed'⁵¹.

Overall the EUSRs legitimacy and accountability is related to the institutional embeddedness in CFSP procedures, which remain **predominantly intergovernmental in nature**. Here the role of the HR/VP and the Council, including their interplay with regard to the appointment and follow-up on the implementation of mandates is crucial. However, the EP's increasing influence on CFSP and security-related matters is exemplified by the case of EUSRs⁵². Through the Declaration of Accountability and the Rules of Procedure the EP has won concessions to be informed on the appointment, the views of the appointed EUSR and the implementation of her or his mandate.

3.2 Practices and Challenges in view of EUSRs' Legitimacy and Accountability

The current legitimisation and accountability of EUSRs is, as previously mentioned, predominantly related to the Council's final decision-making role, as well as the HR/VP's right to propose EUSRs. At the same time, the informal link to the EP remains important, especially when it comes to the accountability of EUSRs (see 3.1). This formal and informal embeddedness of EUSRs via the Council and HR/VP on the one hand, and the EP on the other, is related to **a number of practices and challenges in relation to the EUSRs' overall legitimacy and accountability**.

Member States are in favour of using EUSRs on the ground, as they can keep a better overview of their activities compared to, for example, delegations of the European Union. At the same time, given its central coordinating role in the Council, the permanent PSC chair, who is also part of the EEAS under the authority of the HR/VP, can be seen as a central coordinator of all EUSRs. In contrast, the EP lacks access to 'basic' documents, such as country strategies in the EEAS, and EUSR reports, which are presented to the Council/PSC. To overcome this, the EP and Council would need to change the existing practice, more particularly by revising the inter-institutional agreement on CFSP documents. The **overall lack of access to relevant information** creates a situation where the EP does not always have the necessary information at hand to situate and hold accountable the work of EUSRs within a wider strategic context. One specific issue which would bridge this information gap is if the European Parliament, for example the chair and Members of the AFET Committee, would have access to the different EUSRs' reports (such as the progress and mandate implementation reports to the HR/VP and the Council and the additional reports on their activities to the HR/PSC and the PSC)⁵³, in line with the HR/VP's Declaration of Political Accountability and the 2002 Interinstitutional Agreement between the EP and the Council concerning access by the EP to sensitive information of the Council in the field of security and defence policy.⁵⁴

In the more specific context of human rights, it was mentioned that the work of the EUSR on Human Rights is regularly mentioned in the EP's annual report on human rights. Indeed, the **EUSR is regularly invited to**

⁴⁹ DCA, Rule 5: EP Rules of Procedure (Rule 110).

⁵⁰ DCA, Rule 5.

⁵¹ DCA, Rule 5: EP Rules of Procedure (Rule 110).

⁵² Raube and Rosén 2018.

⁵³ On the reporting requirement of EUSRs, see the Council's 'Guidelines on appointment, mandate and financing of EUSRs' (footnote 7).

⁵⁴ Interinstitutional Agreement of 20 November 2002 between the European Parliament and the Council concerning access by the European Parliament to sensitive information of the Council in the field of security and defence policy (OJ, 2002, C 298/1).

the Sub-committee on Human Rights meetings and more informal working lunches. And yet, there is no systematic relationship which allows the EP to hold the EUSR accountable. Especially on human rights related issues, where the EP also plays an active role, more synergies are needed. For some, a solution would be to have more **regular meetings every six months to strengthen the relationship between the EP and the EUSR**. Even if such a specific arrangement may define too strictly how often EUSRs are to appear in the EP, some EUSRs agree in general, when they express that their relationship with the EP could be stronger. Newly appointed EUSRs expect the relationship to be more ad hoc than systematic. Longstanding EUSRs have indicated that appearances of EUSRs in the Foreign Affairs Committee (AFET) are not taking place regularly. According to one EUSR, more frequent meetings in the committees would allow MEPs to have a more realistic view of the region the EUSR is seconded to. At the same time, EUSRs report that their **relationship with parliamentary delegations of the EP** towards the respective regions varies between frequent communication and occasional ad hoc-meetings, including with heads of the EP delegation. The latter is rather important in view of ensuring that EUSRs and the EP act along the same lines of communication, as it is seen as essential that the EU is able to deliver coherent messages towards third country partners.

At the same time, one should keep in mind that the EP has become **a co-legislator both on the external financial instruments** and the **civilian part of the CFSP budget**, including the part on the EUSRs. The role of the EP is further specified in the Interinstitutional Agreement of 2013 between the European Commission, the Council and the European Parliament on budgetary discipline, on cooperation in budgetary matters and on sound financial management⁵⁵. Article 25 of the Interinstitutional Agreement foresees that the HRVP annually informs the EP about the policy objectives of CFSP, including its financial implications. At least five times per year, joint meetings between the HRVP and the European Parliament⁵⁶.

With regard to the EP's oversight on the CFSP budget, 9 to 10 meetings annually take place on the CFSP budget between the chair of AFET, the chair of the EP's budgetary affairs committee, the chair of PSC and the Head of FPI, during which also the budgets of EUSRs are covered. The EP's current worry is that by **a foreseen merger of all external financial instruments into one, severe financial cuts may also be expected for EUSRs**. This may affect the overall budget made available for EUSRs, which can be seen as a quasi-external instrument in its own right, financed through the CFSP budget and managed by the Foreign Policy Instrument Service. Other voices mention that it should be in the EP's own interest to foresee a larger budget for political staff in the EU delegations rather than EUSRs. Otherwise, Member States may consider more budget for incoming or continuing EUSRs. And yet, one reported advantage vis-à-vis EU delegations is that the budget of EUSRs and their related staff can be seen as being much more flexible than the one of EU delegations.

⁵⁵ Interinstitutional Agreement of 2013 between the European Commission, the Council and the European Parliament on budgetary discipline, on cooperation in budgetary matters and on sound financial management of the European Union, Official Journal of the European Union, C373/1, 20 December 2013.

⁵⁶ Ibid, article 25.

4. Added Value to EU External Action

This section addresses the added value that EUSRs bring to the EU's external action. This includes benefits related, on the one hand, to their position and mandate and, on the other, those related to the personality of the individual holding the mandate. Position- or mandate-specific benefits include the **EUSRs' political clout, their multifaceted flexibility, their presence on the ground** and their regional approach. The importance of personalities is apparent in the EUSRs' profile including senior expertise and diplomatic weight. These traits provide EUSRs with privileged access and a unique position to conduct outreach, facilitate dialogue, and contribute to policy and strategy formulation. Taken together these two aspects reveal the added value of EUSRs to other existing EU players and instruments.

4.1 Position- or mandate-related added value

As elaborated upon in section 2 of this study, the mandates of EUSRs display distinct characteristics, which allow them to fulfil their tasks and contribute to the EU's overall policy objectives. Although these mandates confer upon EUSRs certain explicit tasks, such as demonstrating the EU's engagement or contributing to the implementation of EU policies and strategies in the mandate area, EUSRs still seem to maintain a certain **discretion and flexibility** in how they approach these tasks and structure their work, particularly if compared to other EU instruments. This **distinctiveness** of EUSRs, particularly vis-à-vis other EU instruments, will be reflected upon in the next section, which puts forward four main characteristics of EUSRs' positions and mandates that reveal their added value. These are the distinctively political position of EUSRs, flexibility, presence on the ground and a regional approach.

4.1.1 Political Clout of the Position

The position of EUSRs goes to the heart of the EU's CFSP, which makes the purpose and functioning of the EUSR itself subject to intergovernmental decision-making. The **distinctively political** nature of the position is reflected in the EUSRs' appointment on an ad hoc basis by the Council, in the career background of EUSRs in diplomacy, and in their accountability to the PSC. The lion's share of the EUSRs' work consists of **providing political information and analysis**. This includes also an ability to **deliver political messages**, both towards the EU and towards third countries and regions. Given their extensive opportunities to travel, EUSRs are regarded in Brussels as main focal points bringing messages from the field, while perceived in their focus areas as bringing messages from Brussels. This **exchange of political information** and analyses, and the ability to convey political messages, have the potential of **benefitting both the work of Member States and the activities of other EU institutions**.

On the one hand, EUSRs are formally only obliged to report on their area of focus to the Member States within the PSC. Especially also smaller Member States with lesser capacity to engage with certain issues or regions are said to appreciate and benefit from such exchanges. Maintaining contact with EU Member States, be it at the Council, within EU capitals or in national embassies or EUDs abroad, therefore, remains one of the priorities in the EUSRs' activities. This constant interaction is aimed at 'feeling the pulse' of Member State positions vis-à-vis his/her area of focus and defend political interests.

On the other hand, the position and activities of the **EUSRs also widely complement the work** of other EU institutions involved in the EU's external action, including officials at EEAS headquarters and EUDs, within different European Commission DGs, and to a lesser extent also Delegations of the European Parliament. For example, the EUSRs' political clout has been identified, especially by EU officials working in divisions focusing on a more operational and technical level, as a distinctive added value, as **political coverage and intervention by an EUSR** has the potential of greatly facilitating their actions on the ground. However, given that there is no formal reporting requirement of EUSRs to other institutions apart

from the PSC, the extent to which this is done is fully dependent on the goodwill of the individual EUSR or personal interpretation of his/her mandate.

4.1.2 Flexibility of the Mandate

EUSRs have a certain degree of flexibility due to the budgetary arrangements they are subject to, but also given their exposure to lower institutional burdens, which allows them to efficiently deal with issues of political sensitivity. They are able to serve almost as a 'skeleton key', i.e. a master key that can open various locks, transcending institutional constraints and burdens, and opening up doors that would otherwise be closed.

First, the independence and flexibility of EUSRs' mandates provide a **large window for discretion and pro-activeness** in as far as fleshing out and interpreting their mandates is concerned. As most other officials are embedded within the hierarchy of the EU institutions, the bulk of their work consists of answering to questions and reacting to events. EUSRs have a greater discretion in deciding where to make a contribution. For example, in the case of the EUSR for Human Rights, about 25 per cent of the job description would be dedicated to responsibilities which are prescribed, including chairing several human rights dialogues, while 75 per cent remains available for gaining a strategic overview and pro-actively pursuing objectives based on personal judgement.

Secondly, the **flexible budgetary arrangements** to which EUSRs are subject can be considered a factor which adds value to their position. As explained in section 2, unlike the EEAS, activities and expenditures of EUSRs are funded out of the CFSP budget, which the FPI administers. According to EU officials, this gives EUSRs a certain degree of autonomy with regards to how their budget is used and managed, which is not the case with EUDs, for example, where the administration of the budget is much stricter. Moreover, according to several interviewees, the EUSRs' budget line allows them to do what the EEAS and EUDs are not able to, both in terms of travelling and complementing manpower. **EUSRs have higher travel resources than their counterparts at the EEAS**, which allows them to visit countries and regions with a much higher frequency. This brings great added value in terms of the EU's visibility and presence on the ground, and positively contributes to the EUSRs' role as facilitators. As to complementing manpower, EUSRs have the possibility to hire political staff, which enables their teams to access, analyse and process information that EUDs cannot compete with.⁵⁷ This is particularly applicable to the cases of the double-hatted EUSRs in BiH and Kosovo, who have the two biggest budgets of all, allowing for substantial additional political staff, which EUDs, for example, cannot provide (see 2.4). With regards to the EUSR in BiH for example, EU officials emphasised **the importance of the EUSR's staff**, which represents about 50 % of the EUD staff, in processing and navigating the political complexities of the country⁵⁸. This is perceived as indispensable for the work of the EUD and would not be possible without the additional manpower that the EUSRs' budget allows for. Due to this budgetary flexibility, EUSRs can act as 'force multipliers for the EEAS', contributing positively to the EU's external action.

Finally, EUSRs' exemption from wider bureaucratic burdens is also seen as being of **great added value in dealing with issues of a political nature** and in environments where circumstances can change rapidly. Being malleable, adaptable and subject to lower institutional burdens, EUSRs' mandates allow for enough flexibility for adjustments that reflect such potential changes without having to go through the slower bureaucratic channels and institutional machinery. According to EU officials, **EUSRs are a fast tool to deploy and can be quickly activated** if a certain concern arises in a country, region, or regarding a certain issue-area. Such quick activation and ad hoc nature, which would not be possible if EUSRs were subject to

⁵⁷ Although EUDs usually have more staff than EUSRs can hire, the latter's focus specifically on political issues and analyses which the EUD staff cannot.

⁵⁸ Ibid.

the EEAS's bureaucratic constraints, is not only important in terms of allowing for a swift reaction by the EU, but also in demonstrating its political commitment to the issues at hand. As players that are not directly part of the 'EEAS machinery', EUSRs are, therefore, perceived as having greater margin for manoeuvre and action than their counterparts at the EEAS, allowing for quicker adaptation to evolving and delicate matters.

Overall, this **multifaceted flexibility allows EUSRs to add value** to the EU's external action and, in one interlocutor's opinion, carry out the work the EEAS should be conducting, were it is not subjected to complex bureaucratic processes.

4.1.3 Presence on the Ground

The ability of EUSRs' to **be frequently present 'in the field' is also regarded as a particularly** important added value, which provides the EU with a constant appreciation of what is happening on the ground. Although most EUSRs are based in Brussels, apart from the double-hatted ones and the EUSR for the Horn of Africa, they possess the budgetary flexibility to travel very frequently, as mentioned above. Such possibility to be on the ground is seen by EU officials as bringing great added value in terms of EUSRs' early warning and conflict prevention functions, which are also specifically emphasised in the EU Global Strategy's section on 'An Integrated Approach to Conflicts and Crises'⁵⁹. By being the EU's 'antenna and eyes on the ground', EUSRs are able to follow the complexities of country-level, regional and thematic dynamics, and halt negative tendencies at an early stage. In Kirgizstan, for example, an EU official has referred to the pivotal role of the EUSR in decreasing the conflict potential during the countries' elections by being on the ground and having the ability to maintain active communications with different actors as well as civil society in view of facilitating dialogue and preventing any negative tendencies to develop into more serious issues.

The EUSRs' presence on the ground is also particularly important in that it **provides the EU with a high-level presence and voice**. Given the HR/VP's extremely busy agenda, it is nearly impossible for Ms. Mogherini to travel to all regions and countries covered by EUSRs and provide the regular presence which the latter do provide. Accordingly, EU officials have identified EUSRs' ability to be present on the ground as an important added value and complement to the HR/VP's work. Due to their mandate and diplomatic weight, EUSRs are perceived as having a **senior political standing**, which EUDs or their Heads do not necessarily possess, which equates them with the HR/VP and allows them to give a face and voice to the EU where Ms. Mogherini cannot be present. Contrary to the HR/VP, the EUSR for Human Rights, for example, has the possibility to be present on the ground in Geneva when the UN Human Rights Council is in session and ensure the EU's visibility and interaction with relevant players. As mentioned before, EUSRs also have the budgetary flexibility to travel frequently and the availability to engage with different stakeholders in different countries, which provides the EU with a face and voice in the field.

The presence of EUSRs on the ground, in short, is seen as positively **contributing to the EU's pre-emptive peace efforts as well as the EU's visibility**. Moreover, EUSRs allow for regular high-level engagement in key countries and regions, serving as a quasi-substitute for the HR/VP, who does not have this availability.

4.1.4 Regional Approach

The regional focus of some EUSRs is appreciated as an added value in relation to other players in the EU's external action, as they are able to flexibly engage with actors across borders, thereby gaining and providing insight concerning 'the bigger picture' of regional issues. According to EU officials, the **added value of such a regional approach and mandate** arises from the fact that countries within a given area

⁵⁹ EU Global Strategy, 2016.

often face issues – for instance developmental and security ones – which possess a regional dimension and/or transnational nature and should, therefore, be addressed as such. Particularly with regard to the cases of the Sahel, the Horn of Africa and the Middle East, EU officials have pointed to the fact that the conflicts and issues in these areas are of a regional nature, cutting across silos and borders. In the Sahel, for example, countries face similar problems in terms of desertification, food and nutrition challenges, development, water scarcity and terrorism. Recognising these regional dimensions, countries have already organised themselves into frameworks of cooperation and regional coordination, such as the G5. This demonstrates the pertinence of EUSRs also possessing such a regional mandate, allowing both for the development of common approaches to issues that often transcend borders, and the maintenance of an overview of regional dynamics.

Besides being an added value in itself, the regional approach of EUSRs is also seen by various EU officials as **an advantage when compared to country-specific EUDs and a complement to the latter's work**. As mentioned in the previous subsection as well as in section 2, EUSRs enjoy a certain degree of institutional and mandate-related flexibility, which other EU actors do not necessarily possess. Unlike Heads of Delegation, EUSRs often have a larger regional outreach mandate, which allows them to act in regional processes where the former cannot do this. Accordingly, EUSRs can complement the more specific focus of EUDs and achieve regional results that could otherwise not be obtained, as the example of the EUSR for Central Asia illustrates. According to an EU official, in this case the **EUSR has played a role as a 'regional identity builder'**, creating a web of connections between the different countries which did not yet exist. Although Central Asia is not a region currently suffering from particularly pressing crises, unlike the Horn of Africa or the Sahel, it is still of strategic interest to the EU, given the involvement of other large international players such as Russia and China. The regional approach of the EUSR is important, since it transcends the focus of existing EUDs and is able to create a regional process which benefits the Union and the countries themselves.

Generally speaking, the regional mandates of EUSRs can provide the EU with a more wide-reaching overview of conflicts and issues that would otherwise possibly not exist. By being able to cut across borders, EUSRs add value to the EU's external action and allow for more comprehensive responses.

4.2 Personality-related Added Value

In terms of added value which EUSRs can bring to the EU's external action, some of the position's main **assets are highly dependent on the profile and personality of the individual EUSRs**. The quality of the information and advice they deliver to Member States and EU institutions, as well as the potential impact they can have within their mandate area, are recognised by many EU officials as being character-specific. Some interviewees even see the EUSRs' added value as too dependent on individual personality in order to be able to give a general appreciation about the instrument of EUSRs or consider them as an inherently positive addition to the EU's external action. Given that 'personality is everything', while taking into account also the context of the mandate and particular regional situation to which the EUSR is assigned, EUSRs can either turn out to be a very useful or a very damaging tool in case the position is not handled well.

Overall, **personal judgement and pro-activeness based on extensive diplomatic experience**, along with **the ability to work with a wide variety of actors involved in the subject matter**, are seen as prerequisites to contribute positively to the EU's external action. The following subsections provide an outline of personality-related assets and some examples of best practices, including EUSRs' senior expertise and diplomatic weight, their privileged access to stakeholders and ability to conduct outreach and facilitate dialogue, and their contribution to EU foreign policy making.

4.2.1 Senior Expertise and Diplomatic Weight

An EUSR's ability to act as a political representative, demands a particular profile with **senior expertise** and **diplomatic weight**. Positions are generally assigned to Member State diplomats which have developed a long career in foreign policy and diplomacy, and which 'previously held high positions in international organisations, EU institutions or in national politics'⁶⁰. In this sense, becoming an EUSR is 'not something you do when you are 30'. The amount of political weight that is looked for in a candidate depends on the specific issue area(s) of the mandate. If the key objective is to create visibility and to demonstrate the EU's interest and engagement with regard to a specific region or issue, a high-profile politician is the preferred option, as is the case for the current EUSR for Human Rights, a former Greek Minister of Foreign Affairs and member and Vice-President of the European Parliament.

The **selection procedure** for new EUSRs is as follows. Whenever the Council decides a new EUSR can be appointed, the HR/VP sends out a vacancy note to the Member States. After any potential reservations regarding candidates have been voiced within the Council, the **Secretary General chooses among uncontested nominees** and finally the HR/VP receives the remaining few and proposes a final candidate to the Council, by which time the decision is already agreed upon. In general, the Representatives' expertise, ideally, comes from both working in difficult political and conflict situations, and from experience on the theme and within the region they are assigned to. The latter not only refers to the importance of knowledge about the main focus of the mandate, but also to a thorough understanding of local and regional cultural conventions, traditions and sensitivities in the mandate area, which cannot be overestimated as a basis for the ability to build networks and exert influence.

4.2.2 Privileged Access

Both the political clout of the position, and seniority of the profile, provides the EUSR with a high standing in the region or within the thematic issue area for which he/she is deployed. What is more, EUSRs are said to be perceived by third States on the same level of EU representation as the HR/VP. This elevated standing has the advantage that EUSRs can act as 'skeleton keys', as they are generally able to gain **privileged reception by high-level actors, as well as access to other areas and actors which are difficult or delicate to engage with**. As EUSRs themselves can often be counted among the highest level of national politics, they can expect at least equally high representation from the third country they are engaging with. Whereas EUDs and Heads of Delegations generally engage with the national ministerial level at most, EUSRs often count heads of state and government within their network of frequent interlocutors.

However, in areas where an EUSR is appointed to deal with conflict situations or where the political landscape is particularly complex, it can be even more crucial to connect with actors outside formal state structures. This may include approaching civil society, but also opposition players and dissident voices with which Heads of Delegations cannot formally associate. Visits of the EUSR for the South Caucasus and Crisis in Georgia to Nagorno Karabakh, South Ossetia and Abkhazia, for example, bear a different and less problematic connotation than when a Head of Delegation would undertake such engagement. In contrast to EUDs, EUSRs can **work informally 'below the radar' or 'behind the scenes', test out delicate engagements, and organize confidential meetings** to raise delicate issues both within EU and external contexts. Gaining access, building a network of informants, interlocutors and partners and exercising influence was mentioned to be a highly personal affair, again depending on the personality of the EUSR.

⁶⁰ Tolksdorf 2015: 70.

4.2.3 Outreach and Facilitating Dialogue

The EUSRs ability **to reach out to a wide array of different players** due to this privileged access, along with their ability to **take initiative and facilitate dialogue** relying upon their political clout and diplomatic weight, are seen as main points of the added value which EUSRs bring to the EU's external action. This 'convening power' facilitates coordination among different EU stakeholders, different actors within third countries and regions and other international players and multilateral organisations that play a relevant role within a certain issue area. Some EUSRs also actively coordinate among EU actors in Brussels and on the ground, including EUDs, CSDP missions, EEAS divisions, Commission DGs and Member State representatives. By bridging institutions and actors, EUSRs can actively contribute to a coherent EU voice and a comprehensive EU presence, which can facilitate international interaction and diplomacy.

Various EU officials recognised that such interactions among different stakeholders, including among different EU institutions, may not have materialised, had it not been at the EUSR's initiative. A recent example related to the Central Asia mandate illustrates this. For a conference relating to dialogue among stakeholders and an exchange of best practices in the nuclear energy industry, the **EUSR was said to have mobilised a wide array of regional actors**, including at ministerial as well as business level. He is said to have reached out to the donor community for support, including to the EIB and EBRD. Moreover, the EUSR engaged with multilateral organisations such as the OECD and other relevant individual international players, particularly Russia and China, about their position on certain topics involving his mandate area.

4.2.4 Policy Contribution and Agenda Setting

Building a network constituting a wide array of relevant stakeholders and facilitating dialogue among them, puts the EUSR in a unique position of being a primary contact point regarding the mandate area for the EU on the one hand, and within the mandate area on the other. This position therefore implies a great deal of influence on both ends of the dialogue and possibilities to **raise speaking points**. EUSRs mainly **identify key political challenges and opportunities** within their issue area and are responsible to **put them on the EU's agenda, providing information, political advice and guidance** to different EU institutions. Their input, therefore, either explicitly or implicitly, **contributes to the drafting of strategies and facilitates the implementation of policies** targeting their mandate areas.

Although most interviewees agreed that responsibility for the bulk of foreign policy drafting and implementing lies with the EEAS, EUSRs can play a particular role in '**keeping policy alive**' by continuous evaluation and questioning of existing policies and strategies. In this respect, the ample attention EUSRs and their teams can pay to political analysis and action also allows them to appreciate better 'the big picture', and at times to think ahead or out of the box, which can also give them an '**early-warning function**' regarding possible developments in and around their particular mandate areas. Two recent examples provide further illustrations.

With regard to the Sahel region, the EUSR is acknowledged to have played a pivotal role in identifying the G5 Sahel as a legitimate platform for regional security and development cooperation, to which the EU later pledged its support. Similarly, the EUSR team for the Horn of Africa was able to identify increasing geopolitical tensions in the Red Sea area at an early stage, putting the issue on the EU's agenda. **The EUSR spearheading eventually led the Council to adopt conclusions** on the matter, including an expansion of the EUSR's own mandate in the region. Indeed, although in theory the EUSR's mandate spans the Horn of Africa, the EUSR was in practice able to engage both shores of the Red Sea, bringing in the positions of Egypt, the Gulf States and Turkey. The latter example not only testifies to the flexibility of the mandate to act independently, but also the personal ability of EUSRs to push agendas and even lead to an adaptation of their own mandate.

5. Looking forward

This final section explores ongoing discussions on the future of the EUSRs' position in the EU's external action and formulates suggestions in this respect. In terms of best practices, it is difficult to draw sound and overarching conclusions on EUSRs, given their ad hoc nature and the specificity of their mandate areas. This means that **every situation demands a specific approach** with regard to their benefits in terms of focus, location, profile, the desirability of the practice of double-hatting and the establishment of a Shared Service Centre.

5.1 Future Categories of EUSRs

Despite the EUSRs' demonstrable added value and contribution to the EU's external action, one pertinent forward-looking debate is whether or not the existing categories of EUSRs should be expanded and, if so, which new categories (country, regional or thematic) would be desirable in the future. Most of the interviewees were rather sceptical of such an expansion, enumerating a series of potential problems that could arise out of this decision, such as the danger of overlap. According to EU officials, **increasing the number of EUSRs could create overlaps** both internally with existing structures within the EU, such as certain divisions or directorates, as well as externally with other international instruments such as UN Special Representatives. In the case of existing structures that deal with these policy areas, interviewees rather suggest strengthening and improving their implementation. A further potential issue in expanding the network of EUSRs is the **danger of fragmentation and increased coordination costs**. In this respect, the increase of thematic EUSRs was mentioned as possibly problematic, particularly in regions where other EUSRs already operate, since these players would have an additional layer of coordination to ensure, which could be time consuming and complex. Such complexity, EU officials noted, is already an existing feature of the EU's institutional architecture and should, therefore, not be increased by the presence of more EUSRs. Finally, expanding the network of EUSRs would also have **budgetary consequences**, which could affect the existing EUSRs and possibly have an effect on their work.

For example, the suggestion was made by some Member States, MEPs and civil society organisations to appoint an EUSR for International Humanitarian Law (IHL), which would provide the EU with an enhanced influence and leadership role in a highly contested environment⁶¹. However, this proposition can be argued as problematic from different perspectives, ranging from budgetary consequences to risks in terms of undermining the competence of DG ECHO and creating fragmentation and hierarchy among different aspects of human rights if IHL would receive such increased attention.

Overall, views on the question of expansion mostly emphasised the importance of **keeping a limited but efficient number of EUSRs**. This does not indicate an unwillingness to expand the network of EUSRs, but rather a careful approach to the consideration of new positions, which should be pragmatic as well as ad hoc, and only occur in cases where it brings a particular added value to the EU's action in that area. As one interviewee emphasised, the **decision to deploy an EUSR indicates a serious political commitment** by the EU to a particular country, region or thematic field and, should therefore, be considered carefully.

Despite the general reluctance towards expanding the network of EUSRs, several suggestions have been made with regards to potential cases where this foreign policy tool could be of added value. In general terms, the added value of regional mandates seems to be less contentious than country-specific or thematic ones (see 4.2.3). Nevertheless, most suggestions for **future appointments of EUSRs** refer to either thematic categories or specific countries, which possibly indicates that the regional dimensions that

⁶¹ Human Rights Watch 2018.

require the presence of an EUSR are currently covered. In addition to the suggestion of creating an EUSR for the Western Balkans⁶², the following thematic EUSR suggestions were made: an EUSR for International Humanitarian Law (IHL), which would provide the EU with an enhanced influence and leadership role in a highly contested environment⁶³; an EUSR for cyber-related issues, which would address new regulatory, disinformation and internet governance challenges; an EUSR for non-proliferation; an EUSR for Daesh, which would address the challenges posed by the group in the context of the Middle East; an EUSR for migration, which could ensure greater coherence in the EU⁶⁴. Regarding the latter, some EU officials question the value in having an EUSR for this policy area, given the high amount of attention already dedicated to the topic of migration but also because it should rather be dealt with within the context of human rights as a whole. Country-specific suggestions for new EUSR mandates were also made, such as an EUSR for Ukraine, or one for countries like Yemen, Syria or Libya. Nevertheless, these suggestions emphasised the added value of an EUSR due to the regional dimension that conflicts and issues in these countries possess, thereby reinforcing the importance of EUSRs regional approaches and flexibility (see 4.1).

5.2 Field-based vs Brussels-based EUSRs

The importance of ‘being on the ground’ as one of the main added values of EUSR mandates, is reflected in the extensive travelling they undertake to their areas of focus, as well as to wherever they need to be in order to engage with relevant interlocutors. Nevertheless, both field-based and Brussels-based positions are said to have distinct advantages and disadvantages. Advantages of EUSRs based in the field evidently include their immediate availability for action and constant visibility in their area of focus. However, many interviewees also recognised the **advantages of an EUSR based in Brussels who is flexible to travel whenever necessary**, and this for the following reasons.

First, being based in the field creates the delicate question of which particular country within that region the EUSR should choose as a base. Being based in Brussels evades the potential of diplomatic tensions that may be triggered by making such a choice. Second, being located ‘within the Brussels bubble’ ensures a close connection to the Member States as well as EU institutions and their foreign policy objectives. This aspect is particularly advantageous to EUSRs who are either at the start of their mandates or not used to working within the EU administration because of their background in Member State administrations. Moreover, **EUSRs permanently based in the field risk becoming or being perceived as too independent**, as they are less directly in contact with Member States and EU institutions. Third, both within the bubble and towards the outside world, being located in Brussels creates the perception of having an EU position with a strong link to headquarters. Again, this strengthens the impression of ‘bringing the message from Brussels ‘to the field. Moreover, the danger of becoming too embedded in the political and diplomatic scene of the mandate area applies as much to EUSRs as to any other diplomatic position where rotating systems are applied to prevent it. Regularly checking in with HQ is therefore a requirement, even for field-based EUSRs.

Making up for the disadvantages of not being based in the field, EUSRs profit from maintaining close relations with Heads of EUDs and generally locate part of their staff of political advisors on the ground, for which facilities are then foreseen by the EUSR within EUDs or at separate locations. It is, however, acknowledged that **permanent presence in the field can be required**, depending both on ad hoc circumstances and the nature of mandates. This is for instance the case in the Horn of Africa, where the EUSR has been playing a prominent role in mediating between various regional players, involving constant

⁶² Fouéré 2016.

⁶³ Human Rights Watch 2018.

⁶⁴ Fouéré 2016.

travel. In the cases of BiH and Kosovo, EUSRs are also based in the field, albeit mainly due to their double-hatted mandates as both EUSR and Head of Delegation.

5.3 The Future of double-hatted EUSRs

Currently, two EUSRs – for Bosnia and Herzegovina and Kosovo – are so-called ‘double-hatted’. This means that they combine their EUSR mandate with that of Heads of Delegation, which has been the case when EUSR mandates were assigned to single countries and the Head of Delegation position was created following the entering into force of the Lisbon Treaty (see section 2). Whereas, in theory, the idea was that the EUSR position would become redundant with the introduction of Head of Delegations, the **EUSRs added value to lend a ‘privileged ear’ to EU Member States** and to complement the work of an infant and under-funded EEAS remained apparent.⁶⁵ At the same time, having both an EUSR and a Head of Delegation covering the exact same geographic area makes little sense, given the danger of either far-reaching duplication or differences in opinion obstructing EU coherence. However, the ‘personal union’⁶⁶ of both mandates poses significant challenges.

On the one hand, double-hatting, combined with the flexibility of EUSR mandates, renders it **difficult to determine ‘where one hat ends and the other hat starts’**. In practice, this has often meant that the difference is not made at all and that offices, but also additional EUSR budgets, are fully integrated in the EUD. Although this may be seen as an advantage from an EEAS perspective, which may use this additional budget for its activities, this situation causes difficulties in terms of determining which budget flows to the Delegation and which to the EUSR. This can create problems given that the EEAS budget (managed by the EEAS) and the EUSR budget (coming from the CFSP budget managed by the FPI) are two distinct budget lines managed by different institutions.

On the other hand, double-hatting also ‘relies heavily on an individual to reconcile both roles... As a result, in practice, one role takes primacy over the other’⁶⁷. Given that Delegations are to a large extent staffed by Commission delegates and in sync with the Commission’s activities, the **EUSRs’ position could provide geopolitical and geostrategic analysis** with regards to particular crisis situations unfolding in the country. In the case of Kosovo for example, the attention of both Delegation and Commission lies in accession potential, while EUSR and EEAS should be preoccupied with political tensions and conflict. Even though the two are interlinked and the country is stabilising, one can easily imagine the attention shifting to either side of the spectrum, leaving the other without senior guidance.

Although none of our interviewees stated that current double-hatted mandates are functioning badly, a healthy differentiation between the two roles, with a **clear of division of tasks seems the preferable way forward** in view of these challenges. A possible solution to the issue is suggested by the former double-hatted EU Special Representative for the Former Yugoslav Republic of Macedonia, Erwan Fouéré, who advocates the appointment of an EUSR for the Western Balkans in replacement of the double-hatted ones in Bosnia and Herzegovina and Kosovo⁶⁸. This would both address the above challenges which double-hatting poses and would shape some uniformity in applying the regional approach.

⁶⁵ Fouéré 2016: 5.

⁶⁶ Peter 2012: 3.

⁶⁷ Peter 2012: 3-4.

⁶⁸ Fouéré, 2016.

5.4 National vs EU background

So far, 'most **EUSR posts have been filled with national diplomats** that previously held high positions in international organisations, senior national politicians **or EU officials from the Council Secretariat or the European Commission**'.⁶⁹ The same is true for most current EUSRs, with the notable exception of the one for the South Caucasus and the crisis in Georgia. Both backgrounds, whether it is in national politics of EU hierarchies, have their advantages, as national politicians are usually considered to bring a higher political standing and diplomatic weight, whereas former EU officials are more used to working in multilateral setting and are more familiar with coordination and bureaucracy in Brussels institutions⁷⁰. However, **both backgrounds also yield distinct disadvantages**. Whereas EU officials may exert less political weight and standing, national politicians may turn out 'too independent-minded and unwilling to integrate themselves into the hierarchies of the EU foreign policy system in Brussels'⁷¹. But even when willing to integrate in the EU system, national diplomats may experience difficulties in adapting to the EU bureaucratic culture which they are not accustomed to.

A possible solution to combine the advantages of having national diplomats as EUSRs with the experience of working in EU institutions and multilateral settings, is to provide EUSRs with **supporting staff which knows both issue area and EU institutions** from the very beginning. Currently EUSRs are responsible for hiring their own administrative, financial and political advisors which are either contracted, or seconded by Member State administrations. In this sense, there is little experience and institutional memory transferred from one EUSRs mandate to the next, or between different EUSR teams. Particularly when gaps occur in between mandates, an EUSR may find him/herself to be starting from zero, as contracted staff looked for other employment, while seconded staff was pulled back by Member State administrations. Moreover, finding staff often proves difficult, as national administrations prefer to keep their experts, while the limited timeframe mandates usually provide can deter contracted staff (as well as EUSR candidates themselves).

When asked about the added value of a Shared Service Centre, as is foreseen in the 2014 Guidelines on appointment, mandate and financing of EU Special Representative, interviewees mentioned a sort of archival function or staff management as potential added values for this service, although the general appeal for such a centre appeared to be low (see 5.6). Other suggestions may include the **development of an EUSR manual**, in general or for specific issues and regions, based on predecessors' experiences and best practices. An example illustrating such lack of knowledge transfer includes the provision of safety measure for EUSRs when in the field. While the EUSR for the Horn of Africa integrated security within his budget, the EUSR for the Sahel has been confronted with several incidents due to a lack of such provisions. Whether provided by the EU or integrated into the EUSR budget, such best practices could be agreed upon in advance.

5.5 Further Integration into the EEAS

Given prior experience with EUSRs who use the flexibility of their mandate and relative independence from other institutions to pursue non-coordinated activities, a further integration of EUSRs into the EEAS system has been suggested. However, fully becoming part of the EEAS system, as is currently the case with EU Special Envoys, has **several drawbacks** that would strip the position of some of its main added values related to flexibility, independence and accountability.

⁶⁹ Tolksdorf 2015.

⁷⁰ Cf. Tolksdorf 2015.

⁷¹ Ibid: 70.

On the one hand, **EUSRs would run the risk of losing the flexibility** of their mandate due to being weighed down by the added administrative burden⁷². On the other hand, the integration of their budget within the EEAS may compromise their independence in terms of decision making and ability for quick reaction and travel. The sentiments about further integration into the EEAS differ somewhat. While some agree in theory that EUSRs could be a part of the EEAS, provided that they are guaranteed a special status warranting their flexibility, most concur that they would not be able to adequately fulfil their mandates from within the EEAS structure, given that it is a 'free flowing' and volatile job that is 'impossible to combine with a bureaucratic position'. Nevertheless, the relationship between EUSR and EEAS staff is described by all interlocutors as very close. Indeed, most EUSR staff attends meetings with EEAS divisions and desks on a regular basis and there is said to be a constant flow of information also via email and Coreu.

Another drawback about changing the institutional set-up of the EUSR position is loss of the added value constituting the **close relationship with Council and Member States**. As described in section 3, the current legitimisation and accountability of EUSRs is distinctly intergovernmental and Member States are in favour of retaining their grip on these representatives. Therefore, realistically, Council and Member States can be expected to take a reluctant position vis-à-vis suggestions for a further integration of EUSRs into EEAS structures.

5.6 Creation of a Shared Service Centre

The creation of a shared service centre and joint administrative team for the EUSRs was considered by the Council in 2014.⁷³ However, besides the existence of a central system for IT equipment, this did not fully materialize and opinions about its desirability are divided. One of the aspects in relation to which EU officials see an added value for such a centre, is the **maintenance of institutional memory**. Although the lack of institutional memory can be regarded as a problem which potentially affects several positions within the EU institutions, EU officials agree that its existence in relation to the work and position of EUSRs is particularly regrettable and something which should be improved and worked on. One possibility for the maintenance of institutional memory would be the existence of said service centre, which could perpetuate the work of previous EUSRs and support new ones in their re-engagement with the issue, country or region in question. Although part of this institutional memory can be said to be carried by the EEAS, EU officials have recognised the **importance of archiving the activities of EUSRs**, both from a historical and an accountability perspective. One further advantage such a centre could bring is to provide a focal point for financial pooling, as well as management, mission support and personnel assistance, which are currently activities undertaken either by the EUSR him-/herself or by someone in the team.

These positive views on a shared service centre are, however, not shared by all EU officials. Some do not deny the importance of ensuring institutional memory but see the materialisation of this centre as difficult and potentially problematic. One of the main problems identified in this context is the potential of such a centre to **negatively affect the EUSRs flexibility and margins for manoeuvre**, which are generally appreciated as being one of their important added values (see 4.1). Moreover, the specificity of the work of every EUSR is considered a further hindrance to the establishment of the centre, since it would be a hard task to find overlapping points between the work and mandates of different EUSRs. As one EU official states, EUSRs are not a specific club but rather a foreign policy instrument. As self-standing actors, EUSRs should be responsible for conducting the various dimensions of their work, including managing their budget and recruiting staff.

⁷² Merket 2016.

⁷³ Council Conclusions 2014.

6. Conclusions

The present study assessed the scope and mandate of EUSRs in an effort to explore and analyse the role of this specific diplomatic tool in EU external action. Especially in light of the changes to the conduct of the EU's external action brought about by the Treaty of Lisbon and reflected in the creation of the EEAS and EUDs, the **EUSRs constitute a peculiar entity within a particular institutional setting** that needed further analysis. Against this background, this study shed new light on the current practice of EUSRs. Based on semi-structured interviews with EU players and EU Special Representatives this study focused on the current EUSRs and aimed to be concise and forward-looking in order to present tailor-made conclusions regarding potential reforms.

This study explained the basics regarding the **legal framework of the EUSR position**, including its function, competences and appointment procedures. It provided a comparison and discussion of current EUSR mandates, identifying aspects of similarity and difference, and some of their key overarching characteristics.

Since the appointment of the first EUSR in 1996, a total number of 20 EUSRs have been deployed. Under the current HR/VP, the **number of EUSRs stagnated** as the mandates of the EUSRs have been extended and because **only one new EUSR** has been (re)appointed (i.e. for the MEPP) and the position of one EUSR has been terminated (i.e. for Afghanistan). There are currently 5 'regional' EUSRs (Horn of Africa; Central Asia; the Middle East Peace Process, the South Caucasus and the crisis in Georgia; and the Sahel), two country-specific (and double-hatted) EUSRs (Kosovo and BiH) and one thematic EUSR, which is the EUSR responsible for Human Rights.

As demonstrated in Section 2 of this study, the **legal framework for EUSRs is rather vague**. Neither the Treaty provisions, nor the Council guidelines specify their role. However, when analysing the current mandates of the EUSRs, we can conclude that the EUSRs' main tasks are:

- Provide the Member States (through the Council and the PSC) and the Commission and the EEAS with information about their mandate area;
- Demonstrate the EU's interest and engagement in the mandate area and strengthen the visibility of the Union in the region;
- Conflict prevention and conflict resolution;
- Implement the EU's regional strategies in the mandate area and provide the EEAS and the Commission with input for the formulation of new strategies;
- Contribute to a better coordination of EU activities in the mandate area and contribute to the unity, consistency and effectiveness of the Union's action;
- Cooperate closely with international actors;
- Engage with all relevant actors at local level.

The **budget for EUSRs is considered to be sufficient and flexible** enough for the EUSRs to implement their mandates.

Section 3 focused on the legitimacy and accountability of EUSRs, in order to understand and analyse what feeds into a legitimate role for EUSRs. To that end, this section looked into which actors and institutions were responsible for the legitimisation of EUSRs during their selection processes and how accountability mechanisms for monitoring, controlling and scrutinising EUSR activities are currently practiced. Overall it became clear that the **EUSRs are embedded in a rather intergovernmental context** of CFSP, which however has changed since the Lisbon Treaty. In that regard, the most important sources of legitimacy of

the EUSRs are and remain the Council and the Member States. And yet, the HR/VP works in close conjunction with the Council, determining the mandate and personalities that fill the EUSR mandates. The selection procedure has been seen as opaque and the EP only comes into play once the EUSR has been selected. Still, the **EP should not be overlooked**, especially when considering its role in monitoring the work of EUSRs and its co-legislative powers regarding the civilian part of the CFSP budget, which is used for EUSR financing. However, the study found that the relationship between the EUSRs could be far stronger and more institutionalised.

In Section 4, this study elaborated on the added value that EUSRs' existence and actions bring to the EU's external action. As mentioned earlier, the EUSR proved to constitute a unique tool in view of its benefits and contributions related to the position and mandate on the one hand, and those related to the personality of the individual holding the mandate on the other. Mandate-specific benefits include, as the study was able to show, **EUSRs' political clout, multifaceted flexibility, their presence on the ground and their regional approach**. At the same time, the study finds that the importance of personalities is a key feature of the EUSRs' profiles, including senior expertise and diplomatic weight. These traits provide EUSRs with **privileged access and a unique position** to conduct outreach, facilitate dialogue and coordination, and contribute to policy and strategy formulation. The study showed that, taken together, these two aspects reveal the added value of EUSRs in comparison with other existing EU actors and foreign policy-related instruments.

In the final Section 5, this study explored ongoing discussions on the future of the EUSRs' position in the EU's external action and formulated **suggestions in view of best practice examples**. While it remained difficult to portray EUSRs as a 'system' or 'unified tool' given their ad hoc nature and the specificity of each of the EUSR mandate, the study tried to deliver a set of suggestions, which reflected benefits and challenges with regard to the focus, location and profile of EUSRs, as well as the desirability of the practice of double-hatting and the establishment of a Shared Service Centre in the wider context of EU external action.

The general conclusion is that the **EUSR instrument is a valuable CFSP** tool which does not require fundamental or immediate modification. Moreover, there is an overall appreciation for the work of the current EUSRs among the different EU institutions. One of the key added values of the deployment of EUSRs is indeed their flexibility, which is the result of their unique 'free flowing' position in the EU's institutional framework, their specific budget and their vague legal framework and mandates. This flexibility should therefore be maintained. However, in order to improve the legitimacy of the EUSRs, the transparency of their appointment procedure and reporting duties needs to be improved, in particular vis-à-vis the European Parliament.

Although EUSRs are valuable EU foreign policy instruments, **the appointment of additional EUSRs needs to be considered carefully**, avoiding overlap with the EEAS, the Commission and the Head of EUDs. Only when these institutions are, for legal or political reasons, not able to realise the EU's foreign policy objectives towards a specific region or topic, including the Union's visibility and coordination of different policy instruments, should EUSRs be considered. Therefore, the country-specific EUSRs or double-hatted EUSRs should be phased-out, without leading to a decrease in resources for the EUDs in these mandate areas.

7. Recommendations

Based on the current study and the findings in the preceding chapters, the following recommendations are made, in an attempt to improve and potentially introduce changes to the scope and mandate of EUSRs.

Appointment and Selection of EUSRs

- Despite the established added value of EUSRs, the **deployment of additional EUSRs should be considered carefully**. Expanding the current EUSR network could compromise the position's status and budgetary freedom, while potentially creating fragmentation, overlap and additional coordination issues.
- The political nature of an EUSR demands a profile with high standing and political clout. EUSR candidates should therefore always possess **extensive senior experience** in national, European and international politics.
- The current selection procedure of EUSRs and their mandates should be revised in order to **provide more openly accessible information** on the reasons why candidates and issue-areas were selected.

Mandates and EUSRs' Functions

- When assigning new EUSR mandates, **maximum added value and complementarity should be ensured**, while avoiding overlap and institutional competition, for example with EUDs and country desks at headquarters. Narrowly-defined country-specific mandates should therefore be avoided.
- In order to strengthen the EU's capacity to act pre-emptively instead of reactively, the **EUSRs' early-warning and conflict-prevention function** should always inform more immediate and strategic plans of action at headquarter-level in Brussels.
- Given the far-reaching integration of double-hatted EUSRs within EEAS and Commission activities, a clear division of functions cannot be established, which also feeds into challenges in terms of budgetary transparency. It is against this background that a **double-hatted nature of EUSRs needs to be carefully revised**, especially when considering the prolongation of existing double-hatted mandates.
- In view of uniformity, the **replacement of the remaining two double-hatted EUSR mandates** with a regional mandate for the Western Balkans should be considered.
- In order to ensure a **better link between the EUSRs and EU regional strategies**, respective EU action plans should more clearly define the role of EUSRs for their implementation.
- The **length of mandates should be carefully considered**. Even though regular evaluation of mandates is positive and necessary, it can be argued that longer mandates may benefit both the appeal and efficiency of the position. A longer time perspective provides a certain amount of security to both the EUSR and his/her staff, which may attract a larger amount of EUSR and staff candidates. Such longer timeframe also creates continuity and institutional memory as a result.
- When the occurrence of gaps in between mandates is a risk, i.e. when there is a period of **time between the outgoing EUSR and the incoming one**, a transition period for current operating staff should be considered as it could help ensure continuity and institutional memory.

Integration of EUSRs in the EU's system of external action

- Further administrative integration of EUSRs within the EEAS should be considered with caution. EUSRs should be retained as **flexible and quick activation tools** by maintaining the flexible budgetary arrangements and large window for pro-activeness that are foreseen in their mandates.
- In order to ensure **efficient collaboration between the EUSRs and other EU institutions**, EUSRs should strive to balance their presence in the field with regular interaction with EU institutions in Brussels. That being said, an EUSR's presence on the ground is regarded as one of its main assets to back up the EU's overall engagement in a respective geographical region or topical area.
- The creation of a Shared Service Centre, as foreseen in the Council Guidelines (2014), is seen as potentially **undermining the flexibility of EUSRs**, which is one of their great added values. It is, therefore, currently not perceived as a necessity. At the same time, the maintenance of institutional memory could be ensured by creating a position in the EEAS responsible for archiving as well as for initial logistical and administrative support to new EUSRs. This position could provide a manual for starting EUSRs that could brief them on past best-practices.

The European Parliament and EUSRs

- The interaction between EUSRs and the EP should be **further institutionalised**, offering the EP more opportunities to receive information on a regular basis about the work, achievements and challenges that EUSRs face on the ground. That being said, the initiative to invite EUSRs for briefings rests with the EP.
- The Chair and Members of the AFET Committee should be able to have **access to the different reports of the EUSR to the Council and the PSC** in line with the HR/VP's Declaration of Political Accountability and the 2002 Interinstitutional Agreement between the EP and the Council concerning access by the EP to sensitive information of the Council in the field of security and defence policy.

8. References

8.1 List of Conducted Interviews

Interview #	Institution	Place	Date
Interview 1	Former EU Special Representative	Brussels	22/10/2018
Interview 2	European Parliament	Brussels	24/10/2018
Interview 3	European External Action Service	Brussels	24/10/2018
Interview 4	EU Special Representative	Brussels	24/10/2018
Interview 5	EU Special Representative	Brussels	26/10/2018
Interview 6	European External Action Service	Brussels	26/10/2018
Interview 7	European External Action Service	Brussels	26/10/2018
Interview 8	European External Action Service	Brussels	30/10/2018
Interview 9	European Commission	Brussels	30/10/2018
Interview 10	European Commission	Brussels	30/10/2018
Interview 11	European External Action Service	Brussels	30/10/2018
Interview 12	European External Action Service	Brussels	30/10/2015
Interview 13	European External Action Service	Brussels	30/10/2018
Interview 14	European External Action Service	Brussels	31/10/2018
Interview 15	European Commission	Brussels	5/11/2018
Interview 16	European External Action Service	Brussels	5/11/2018
Interview 17	EU Special Representative	Brussels	6/11/2018
Interview 18	European Parliament	Brussels	6/11/2018
Interview 19	EU Special Representative (staff)	Brussels	6/11/2018
Interview 20	European Parliament	Brussels	22/11/2018
Interview 21	EU Special Representative (staff)	Brussels	23/11/2018

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