

Chapter 9

The Role of Civil Society in EU Policy Implementation in Bulgaria

Asya Zhelyazkova and Reini Schrama

Civil society organizations (CSOs) are often credited with increasing public accountability and improving governance outputs. A vibrant civil society can potentially increase transparency of policy-making and hold governments accountable to implement policies accordingly. Furthermore, CSOs cooperate with policy makers by communicating societal interest and creating a broad policy support base. The present study investigates the involvement of civil society in policy outcomes in Bulgaria in the context of European Union (EU) policy implementation. As a postcommunist country, Bulgaria is expected to exhibit low levels of civic participation. On the one hand, membership in the EU has transformed Bulgarian CSOs into domestic watchdogs of EU legislation, where civic actors can report to the EU Commission any observed problems in the implementation of EU policies.¹ On the other hand, scholars have pointed out that low levels of civic participation are compensated by activism aimed at connecting with political actors,² and thus shaping policy outcomes. As a result, it is in the interest of national governments to consult with CSOs before implementing any relevant pieces of EU legislation. In other words, civil society strength is a multidimensional concept that incorporates both CSOs' capacity to organize citizens in collective activities and their ability to influence the policy-making process indirectly by participating in government consultations or through informal and formal networks with administrative and supranational actors.

To assess the influence of CSOs on policy outcomes in Bulgaria, we first broadly compare different aspects of civil society strength related to civic participation and government consultation and the level of practical implementation of different EU directives. This analysis shows that whereas Bulgaria exhibits both weak consultation with government and low levels of civic participation, the administrative actors show relatively high levels of compliance with EU directives in the practical phases of the implementation process. Does this imply that effective policy implementation could coexist with weak civil society structures? To acquire better understanding of the link between civil society and policy implementation, we apply a network approach to the structure of civil society monitoring in Bulgaria and their ties with national and EU institutions in the area of gender equality legislation. Our analysis reveals that the Bulgarian monitoring network is indeed only loosely

linked to other domestic civil and political actors. However, it has strong ties with the European Commission and maintains informal relations with the national government, which could explain the observed high levels of practical compliance with EU directives. We conclude with a discussion of the role of civil society in linking democracy and governance outputs in the case of Bulgaria.

THE CURIOUS CASE OF CIVIL SOCIETY STRENGTH AND POLICY IMPLEMENTATION IN BULGARIA

To what extent does Bulgaria comply with the EU rules? Is there a positive relation between different dimensions of CSO strength and the implementation of EU policies? To address these questions, we employ a novel data set combining two distinct dimensions of civil society strength: civic participation and consultation, with unique information about member states' implementation of twenty-four EU policies from four policy areas (internal market, environment, justice and home affairs, and social policy). The data set on policy implementation is based on external evaluation reports about national implementation of EU policies that were prepared by various consultancies contracted by the EU Commission. The criteria for data collection and measurement of policy implementation have been extensively discussed elsewhere.³ The main advantage of the data set is that it provides a measure for the “practical” implementation of EU policies capturing administrative activities across twenty-four EU member states. This is important for the purposes of the study because national citizens experience the impact of public policy through the implementation of EU policies rather than the legal framework adopted by governments.

Civic participation is measured by the percentage of respondents in Eurobarometer surveys that indicated they participated in specific voluntary organizations. To obtain information about CSO consultation, we rely on data from the V-Dem project.⁴ Country experts were asked whether major CSOs were routinely consulted by policy-makers on issues relevant to their members (see Schrama and Zhelyazkova for a fuller description of these measures).⁵ [Figure 9.1](#) shows that Bulgaria exhibits relatively high levels of practical implementation of EU directives across the four policy areas. In general, however, we do not observe strong and significant differences across different member states. Instead, both civic participation and government consultation practices are generally very low in Bulgaria. Put differently, Bulgarians are less likely to participate in voluntary organizations based on our data set. In a similar vein, governments rarely consult with relevant CSOs during policy-making. Thus, based on our data, there is no relationship between the two aspects of civil society strength and the implementation of EU policies in Bulgaria. Whereas Bulgarian bureaucratic institutions seem capable of implementing the EU rules in practice, their strong implementation performance cannot be explained by the two dimensions of civil society strength.

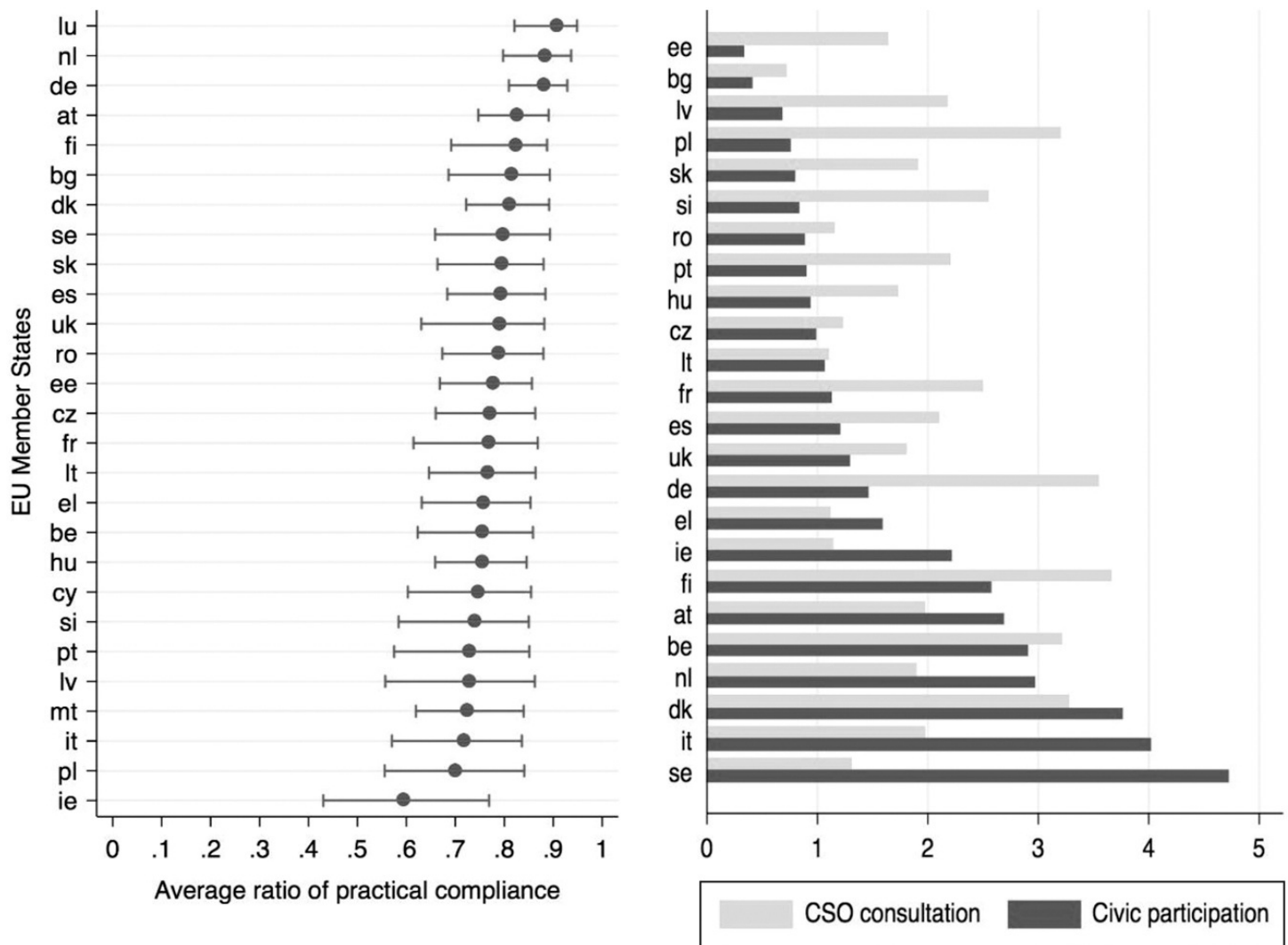


Figure 9.1 Level of Practical Compliance (Left) and Level of CSO Consultation and Civic Participation Across Member States (Right). Zhelyazkova et al (2016) & Schrama & Zhelyazkova (2018).

The findings presented in Figure 9.1 are puzzling for several reasons. First, Bulgaria’s relatively strong implementation record is highly surprising. When Bulgaria joined the EU on January 1, 2007, it was widely regarded as one of the “laggards of the Eastern Enlargement”⁶ due to unfinished reforms in the judicial system and prevalent corruption. Consequently, the EU instituted a cooperation and verification mechanism (CVM) as a post-accession instrument to continue monitoring Bulgaria’s progress in fighting organized crime and corruption. Multiple Commission reports indicate that “without irreversible progress on judicial reform, fight against corruption and organized crime [these countries run] the risk of being unable to correctly apply EU law.”⁷ Moreover, and in addition to its inability to cope with corruption, Bulgaria has relatively weak bureaucratic structures that prevent the state from implementing and formulating coherent policies.⁸ Even though Bulgaria has significantly improved its regulatory quality and government effectiveness, the country still lags behind other CEE member states.⁹

Finally, several studies suggest that even when national governments institute policies that

comply with the EU rules, formal rules are not applied in practice due to communist legacies.¹⁰ Therefore, it is highly unlikely that Bulgaria excels in the practical implementation of EU policies. The second reason why the findings in Figure 9.1 are puzzling relates to the observed weak civil society structures based on two dimensions of CSO strength. This observation is especially striking with a view to the high levels of practical implementation, as existing research shows that both civic participation and CSO consultation are necessary for effective policy implementation.

UNRAVELING THE ROLE OF CIVIL SOCIETY STRENGTH FOR POLICY IMPLEMENTATION

Since its revival in the last couple of decades civil society has been described as an important facilitator for democracy and democratic institutions by various strands of literature.¹¹ By aiding collective action, civil society enables citizens to mobilize and hold their government accountable.¹² Based on this perspective, civil society strength is reflected in the size and scope of civic participation in voluntary organizations.¹³ Studies of governance and interest mediation also stress that CSOs play an important role in the formulation and implementation of government policies. For example, Hadenius and Ugglä underline that CSOs need to cooperate with governments in order to effectively further democratic reforms in countries undergoing transition to democracy.¹⁴ CSOs aggregate the interests of citizens and act as mediators in state–society relations by communicating societal grievances to policy-makers.¹⁵ However, the influence of civil society on policy reforms also depends on the opportunity structures provided by the state.¹⁶ For example, states can empower CSOs by providing them public recognition and access to policy-making through consultation mechanisms. Alternatively, states may deny CSOs opportunities to voice societal interests during the policy-making process, making public policy vulnerable to disruptive protests. The different perspectives on the role of civil society for democracy and governance should have consequences for the implementation of EU policies in Bulgaria.

Civic Participation

It is widely conceived that a democratically strong civil society can act as a watchdog in opposition to the state and thereby increase government accountability in postcommunist societies like Bulgaria. From a theoretical standpoint, higher levels of civic participation in Bulgaria could improve policy implementation because CSOs enjoying large and active membership would be better able to understand societal grievances and communicate these to the relevant political institutions. CSOs can rely on the support of volunteers, mobilize collective action, and extract resources from their members to facilitate implementation.¹⁷ Furthermore, the higher the number of active CSO members, the more CSOs can rely on their experiences with public policy to gain information about its proper implementation.¹⁸ Consequently, CSO members and supporters can serve as effective “fire-alarms” when there

are gaps in policy implementation.¹⁹ In a similar vein, civic participation enables CSOs to engage more volunteers to monitor the implementation of public policies or participate in civic actions that facilitate the implementation process (i.e., collect donations, organize and participate in initiatives raising public awareness of societal problems). Furthermore, CSOs could successfully negotiate the adoption and implementation of relevant policies by presenting an increasing support to their civic causes to government officials and implementing actors. Alternatively, CSOs relying on active membership base and high levels of public support are more successful in organizing protests against policy outcomes that undermine their goals and the interests of their members. Consequently, large-scale protests increase the visibility of social problems to the general public and threaten electoral support for democratic governments. Based on these arguments, higher levels of civic participation are generally expected to positively influence the implementation of public policy. Applied to the EU context, higher levels of civic engagement in organizations supporting the goals of EU legislation is likely to increase member states' implementation of EU policies.

As shown in [Figure 9.1](#), though, societal mobilization in Bulgaria is relatively weak, with few Bulgarian citizens reporting membership in civic organizations. It is generally assumed that communist legacies prevent citizens from fully developing their civic skills that enable them to express their voices in the national policy-making process.²⁰ Some studies have emphasized the potential of the EU for empowering civil society actors in postcommunist countries by offering new opportunities for them to voice their interests and participate into domestic policymaking.²¹ Yet, the extent to which CSOs have become empowered is often conditional on their willingness and capacity to exploit these new opportunities. In particular, a special issue in *Acta Politica* has explored the relationship between Europeanization and civil society in the context of Eastern enlargement. The general findings suggest that poorly resourced actors have not been able to make use of the additional rights and networks, exactly because of limited resources to make their voices heard. Moreover, EU opportunities often require partnering with state actors, which many civil society actors are not always willing to do. In sum, civic participation cannot alone explain the high level of practical implementation of EU rules in Bulgaria.

CSO Consultation

Effective policy implementation also depends on the ability of CSOs to act as an intermediary between citizens and the state and articulate and represent interests in the policy-making process. A recent study by Schrama and Zhelyazkova shows that high levels of civic participation are not sufficient to explain variation in member states' implementation of EU policies.²² Instead, only when civic participation is combined with frequent government consultations with civic actors do we observe improved levels of policy implementation. To influence public policy, CSOs need to share their expertise and provide advice to governments about societal interests and the most effective implementation strategies. CSO involvement in the policy-making process, thus, helps policy-makers understand the impact of their decisions on the citizens they target as well as the best policy

choices to meet EU policy requirements.²³ For example, Putnam et al. demonstrated that reforms are most effectively carried out when they are a joint effort by CSOs and the state.²⁴ First, by frequently engaging civic actors in the policy-making process, governments demonstrate their readiness to incorporate societal preferences in the adoption and implementation of public policy. Second, consultations with CSOs also help governments better understand citizen concerns and preferences regarding different policy initiatives. As Petrova and Tarrow report, “Bulgarian NGOs have had success in opposing and supporting legislative proposals in Parliament”²⁵ by lobbying in favor of fiscal decentralization, where municipalities won the right to decide how to spend a small portion of their municipal budgets.

Nevertheless, the success of consultation processes is conditional on the existence of representative societal groups willing to participate and on the public support CSOs are able to mobilize. Without broad public support, CSOs may not be aware of societal grievances and may provide incomplete and uninformed advice to governments regarding the impact public policies on the citizens they target. At the same time, the impact of civic participation on policy implementation depends on whether CSOs are involved in the policy process. More precisely, the exclusion of CSOs from the policy process could lead to policies that lack support, because citizens are not able to communicate their interests to the state.²⁶ Consequently, without access, civic participation could cause societal discontent against public policies.²⁷ Accordingly, Schrama and Zhelyazkova find an interactive relation between civic participation and government consultations with CSOs that has a positive impact on policy implementation. In other words, civic participation and CSO consultation are like “horse and carriage”: for a positive impact on policy implementation, one cannot go without the other.

The theoretical relationship between civic participation, CSO consultation, and EU policy implementation defines the second puzzle emerging from the findings in [Figure 9.1](#). As observed, Bulgaria generally applies EU directives in a compliant manner despite weak civic participation and limited involvement in government consultations. Schrama and Zhelyazkova find that the positive impact of civil society on practical implementation is conditional on the existence of strong bureaucratic capacities. Instead, policy implementation in Bulgaria is generally hindered by weak bureaucratic structures. In those countries in which a vibrant civil society is needed most to counterbalance weak bureaucratic institutions, CSOs are not able to exert a positive impact on policy outcomes. Nevertheless, the existence of weak bureaucratic structures does not explain why Bulgaria complies with EU policies. How can we explain these puzzling findings?

Unraveling the Puzzle

Some scholars have opposed the view that civil society is particularly weak in Bulgaria because of postcommunist legacies.²⁸ Whereas micro characteristics of activism related to citizen’s participation in policy-making (i.e., *participatory activism*) may be indeed feeble,

CSOs in the region have preserved or developed both enduring and temporary macro structural characteristics, such as ties with other organized nonstate actors, political parties, and government and bureaucratic institutions (i.e., *transactional activism*). As a result, even if CSOs do not participate in government consultations, they can have access to other relevant political institutions. Alternatively, CSOs could form coalitions with other actors from the civic sector, increasing their resources to monitor government compliance with various public policies. Moreover, there are doubts whether CSO cooperation with government improves policy outcomes in the case of Bulgaria. Whereas the number of NGOs increased fivefold in the period 2000–2009, many of these institutions became a tool for corruption and rent-seeking.²⁹ The Center for Democracy in Bulgaria reports that “Bulgarian government has come to play a crucial role in NGO funding.”³⁰ In the 1990s, project funding intended for NGOs came only from foreign sources. By 2006, the situation had changed dramatically and “EU and other grants distributed by the government constituted 40 per cent of NGO funding.”³¹

Whereas CSOs’ close relations with government may not be conducive to effective practical implementation, membership in the EU has provided new opportunities for CSOs to avoid “state capture.” In particular, the EU institutions have recognized the importance of CSOs for democracy and governance in the countries from Central and Eastern Europe (CEE).³² The EU’s decentralized monitoring mechanism relies heavily on private actors at the domestic level to raise complaints with the Commission or to litigate in national courts against breaches of EU law. Furthermore, membership in the EU has further empowered CSOs in Bulgaria and other postcommunist countries by providing them with direct access to supranational institutions such as the EU Commission and the European Parliament. As the guardian of the treaties, the EU Commission is highly dependent on information provided by domestic actors about gaps in policy implementation. In CEE countries, CSOs are considered an important ally to the EU Commission because they are ready to “fire the alarm” whenever national governments fail to comply with EU legislation that supports their causes.³³ For example, Bulgarian nongovernmental organizations (NGOs) have been successful in compelling governments to comply with EU environmental legislation by informing the Commission about observed implementation gaps.³⁴ As a result, EU membership provides CSOs with opportunities to bypass national governments and seek policy outcomes through other channels at the supranational level.

Network Approach to Civil Society Strength

Cooperation with government is not the only aspect that could influence the strength of civil society, but ties with other political and nonpolitical actors are also relevant. In particular, having ties with other stakeholders in a given policy could increase the capacity of CSOs to monitor the implementation activities by government and administrative actors. Even if CSOs are unable to affect the policy-making process directly, they may be still able to detect implementation problems and bring these issues to the awareness of the general public and

international organizations. Because the correlational analysis above does not provide insights about the relevant mechanisms linking the monitoring capacities of CSOs to their relations with different political and civic actors, we adopt a network approach in order to further explore CSOs' monitoring abilities in Bulgaria. In this context, we define monitoring as the collection and dissemination of information on issues of implementation of EU policy. The pattern of linkages through which information is exchanged we define as a monitoring network.³⁵

We apply network analysis in EU policy field of gender equality and women's rights in Bulgaria. With the development of European policy on gender equality and women's rights, member states committed themselves to the implementation of several EU directives, and this policy instrument empowered civil society groups to hold national authorities accountable. In 1990, the EU Commission supported the foundation of the European Women's Lobby (EWL), providing the main platform for transnational collaboration by women's groups across Europe³⁶. Data collection relies on structured interviews combined with a computer-assisted telephone survey using the egocentric network data collection program EgoNet.³⁷ The survey was completed by the representative of the Bulgarian national platform at the General Assembly of the EWL. The survey was administered in two stages. In the first stage, the national representative was contacted by email and asked to name all the relevant actors in their network. In the second stage, an online meeting was planned to inquire about the characteristics of their organization (ego), the type of relations they maintained with the named actors (alters) and the relations their alters maintained with each other.³⁸ Based on the survey, a tie between actors in the monitoring network constitutes "a regular exchange of information about affairs related to the implementation of the EU gender directives."

MONITORING CAPACITY OF THE BULGARIAN PLATFORM OF WOMEN'S GROUP

Material Resources

To establish the capacity of the Bulgarian platform of women's group to monitor EU policy implementation, we first analyze what resources it has at its disposal. Monitoring is costly; CSOs need the capacity to effectively collect information, assess whether targets are actually met in practice and communicate detected implementation problems to the relevant policy-makers. This requires all kinds of resources. Besides the institutional resources, such as access to consultation with policy-makers we discussed earlier in this chapter, CSOs need funding and staff to engage in monitoring activities.³⁹ In a study on monitoring activities of CSOs in the field of Environment, Nerbonne and Nelson found that organizations with more human resources were able to produce information of a higher standard.⁴⁰ In addition, organizations with more financial resources produced more official reports and were better able to further investigate implementation issues.

In line with our earlier findings on the limited opportunities of Bulgarian CSOs to access

formal consultation with domestic policy-makers, we find that the Bulgarian national platform of women's groups was excluded from formal consultation at least once in the past five years. At the time, the Bulgarian platform operated as a nonformal coalition of women's group. Without registration as an NGO under national law, they were not allowed to engage in formal dialogues with members of government. Furthermore, without their official registration as an NGO, the Bulgarian women's lobby was not eligible for national or international subsidies and fully relied on project funding from their member organizations. Finally, this lack of financial resources resulted in the difficulty to maintain continuity in their activities and limits their ability to staff their organization. Again, the platform has been dependent on staff from their member organizations and the coordination was done by a single person.

Relational Resources (Social Capital)

Despite the constraints listed above, the Bulgarian platform of women's lobby has been able to build a relatively large network in which they exchange information on issues of implementation of the EU gender directives with a large variety of actors. Although the size of their network is not as large as in some Western European member states, compared to other monitoring networks in the CEE region, they managed to link up with a relatively high number of actors (9). On an informal basis, they exchange information with government officials, members of parliament, experts on gender equality legislation, and other CSOs. This underscores findings of earlier studies on the ability of Bulgarian NGOs to compensate for low levels of civic participation through activism based on linking up to all kinds or relevant policy actors.⁴¹

To fully explore the sources of social capital the Bulgarian women's lobby has at its disposal, we take into account the relational structure of the network as well. Monitoring requires both interactions that provide access to new information and interactions carrying trust and credibility to disseminate and mobilize it.⁴² Linkages that enable information to be bridged across the network (bridging ties) and interactions within tightly knitted network clusters (clustered interactions) are recognized as crucial sources of social capital facilitating coordinated action.⁴³ On the one hand, ties that bridge different parts of the network lead to information that is different from what is already circulating among more closely related partners. On the other hand, clustered interactions ensure for more social control over what information is being exchanged. This allows for a quicker detection of misinformation resulting in better communication and a high level of trust.

Using social network analysis, we are able to detect which structural features described as a source of social capital are present in the monitoring network of the Bulgarian platform of women's group. To measure whether networks are rich in social capital, one must look at network properties accounting for bridging ties and clustered interaction. By performing conditional uniform graph tests, we test these key network properties for significance. The values of these properties are compared to a random sample of 1,000 network configurations, while keeping the size and density of these networks constant. This way we can compare

whether values of network properties accounting for social capital exceed levels expected by chance.⁴⁴ Next, we describe how three key network properties account for social capital in the monitoring network of the Bulgarian platform of women's groups.

First, *transitivity* is the extent to which actors cluster together since it measures how much a network consists of triadic relations. This concept captures the tendency of actors to relate to those that are already related to them indirectly. In other words, friends of my friends *are my* friends. This type of clustering is likely to result in more trusted and stable information exchange.⁴⁵ The higher the number of shared partners the actors have, the more stable is their relation and the more likely they trust each other with information exchange. We find that the network of the Bulgarian women's lobby has significantly higher levels of transitivity ($p < 0.05$) than one can expect from a network of that size and density. This means that, compared to thousands of random networks with a similar number of actors and a similar number of ties, the pattern of linkages in the monitoring network of the Bulgarian platform of women's lobby is particularly clustered. This shows that their monitoring network consists of tightly knitted interactions of trusted information exchange. The Bulgarian monitoring network's exceptionally high levels of transitivity display how closely knitted and trusted interactions potentially provide the national platform of women's group in Bulgaria with the social capital needed to monitor the implementation of EU gender equality policy.

Second, *centralization* is another type of network clustering. Centralization reflects the extent to which one actor is able to control the network through its exchanges. The more one actor is connected to many of the other actors and many of the other actors are connected to this one actor, the more hierarchical the network is and the more information exchange can be coordinated from above. We find that the level of centralization in the monitoring network of the Bulgarian women's lobby is on the lower end, though it is significantly different from the distribution of random networks. The average level of centralization indicates that the Bulgarian women's lobby is not hierarchical. Instead of one actor controlling the network and being able to coordinate monitoring activities, the network structure reveals equal power among many actors.

Lastly, *betweenness* reflects the power of bridging otherwise-unconnected parts of the network. The more one actor is in between other actors that are not already directly connected with one another, the higher is its betweenness score. Networks with this tendency are more open to new information seeping into the network, instead of circulating information that is already known to most of the actors. The monitoring network of Bulgarian women's groups exhibits significantly low levels of betweenness centralization ($p < 0.1$). This suggests that actors are less able to bridge different parts of the network. If it were not for the Bulgarian platform of women's groups itself, the same information would be circulating among close-connected actors, without any of them being able to bring new information to the table.

In sum, the Bulgarian platform of women's groups shows that even though they have virtually no funding, staff, or formal access to policy-making, they are still able to engage in monitoring activities using their network. As indicated in [Figure 9.2](#), compared to more

classic resources to engage in monitoring activities (left), they are much better equipped in terms of their social capital (right). This demonstrates that social capital may indeed enable CSOs to compensate for their lack of institutional, financial, and human resources and underscores that there are alternative measures for civil society strength.

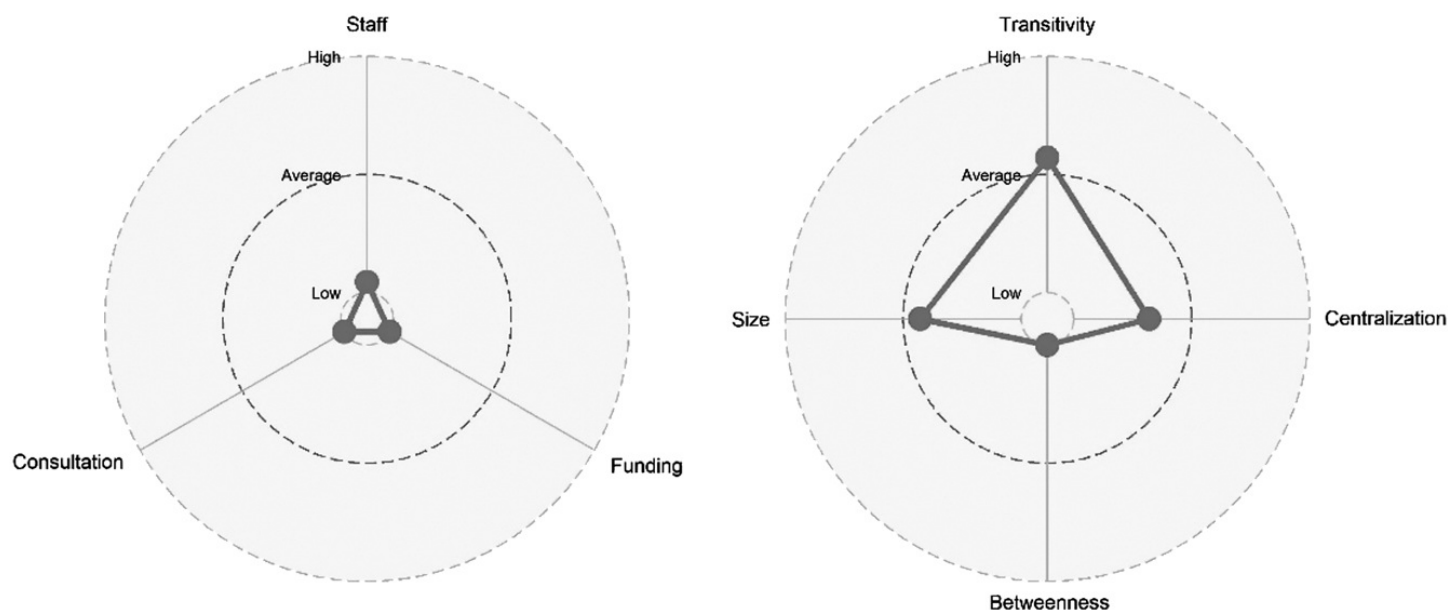


Figure 9.2 Sources of Institutional, Financial and Human Capital (Left) and Social Capital (Right) of the Bulgarian Platform of Women’s Groups. Created by the author.

Visualizing the monitoring network of the Bulgarian platform of women’s groups, presented in Figure 9.3, allows us to further explore these patterns of exchange. First, it is important to note that the national platform of the women’s lobby in Bulgaria manages to link up with a wide array of actors. They exchange information with actors ranging from grassroots, regional, and European civic actors to government officials on the national and European level, with political actors, and with experts concerned with the practical implementation of EU gender directives. Despite a clear lack of funding and institutional resources, the monitoring network of women’s groups in Bulgaria is particularly rich in both the variety of actors involved and the number of linkages between them, compared to other CEE countries.⁴⁶ Second, in line with earlier findings, we observe a transitive cluster of information exchange between ministerial actors, the national assembly, the designated equality body, and the European Commission. Third, besides the Bulgarian platform of women’s groups themselves, we do not find that any other actor has a coordinative role in the monitoring network; both Bulgarian and European policy-makers and domestic actors responsible for the implementation of the EU gender directives are equally connected.

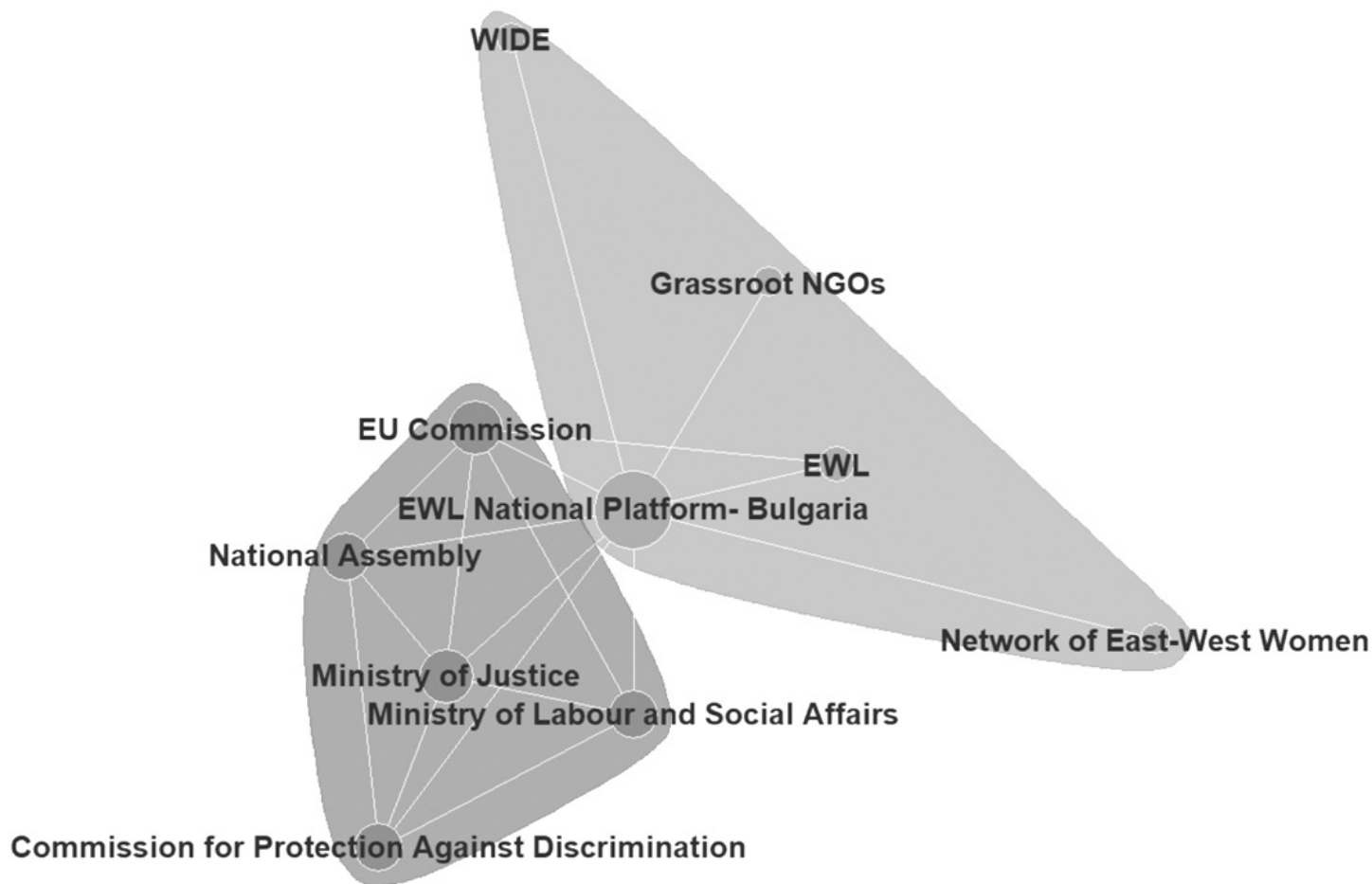


Figure 9.3 Detected Communities in Monitoring Network of the National Platform of Women’s Groups in Bulgaria. Created by the author.

Finally, a community detection algorithm clearly shows that the monitoring network of the national platform of women’s groups in Bulgaria consists of two groups of actors that tend to exchange information with each other. This algorithm detects clusters of actors that connect more to others within that cluster than can be expected by chance alone. In particular, all civic actors are in a separate cluster from the tightly knitted cluster of domestic policy-makers and implementers and the European Commission. Not only is the civic community separated from other types of actors, it is also less interconnected. This underlines the important role the Bulgarian platform of women’s group plays in ensuring information can travel from one cluster to the other.

In sum, despite successful outreach of the Bulgarian platform of women’s group to all kinds of actors and their efforts to build a network that is in some aspects rich in social capital, their monitoring network does display weaknesses of Bulgarian civil society more generally. Domestic civic actors are isolated within the network and not able to engage in information exchange with any of the relevant policy actors. Nevertheless, a potential asset of the monitoring network of the Bulgarian women’s lobby is their direct access to the European Commission. This indicates that the Bulgarian platform of women’s groups can bypass domestic policy-makers and directly exchange information at the European level and still be quite effective. Through this European route to monitoring, Bulgarian civil society is able to

make full use of their opportunities to support institutional mechanisms implementing the principle of gender equality, while it can prove to be useful for the European Commission as well to keep compliance in check.⁴⁷

CONCLUSION

The present study assessed the strength of civil society in Bulgaria in relation to the implementation of EU directives. The existing literature has identified different dimensions of civil society strength related to the ability of CSOs to organize citizens into collective action and their influence on the policy-making process. As a postcommunist country, Bulgaria is expected to exhibit low levels of civic participation. On the other hand, membership in the EU has allegedly empowered CSOs in other aspects, by improving their relations with supranational institutions such as the EU Commission and the European Parliament and “forcing” governments to cooperate with CSOs in the implementation of public policy.

Whereas civil society strength is a multidimension concept, it is an open question how different aspects of CSO strength affect policy outcomes. Our analysis shows that not all aspects of CSO’s strength are relevant for the implementation of EU policies in the case of Bulgaria. The average level of civic participation is lower in Bulgaria than other EU member states. In a similar vein, the Bulgarian national authorities rarely formally engage with CSOs during the policy-making process. Nevertheless, these deficiencies do not result in failure to effectively implement EU directives. Bulgaria is one of the most compliant EU member states, despite limited civic engagement on EU-related issues and weak formal participation in government consultations. Does this finding imply that the strength of Bulgarian civil society is not relevant for effective policy implementation? Our findings provide mixed evidence to this claim. In particular, we conducted in-depth network analysis of one CSO in Bulgaria: the Bulgarian national platform of European Women’s Lobby (EWL). The Bulgarian EWL platform is responsible for monitoring the implementation of EU policies in relation to gender equality and reports observed gaps to the EU Commission.

The case study analysis shows that the Bulgarian CSO maintains informal relations with the national government by regularly exchanging information with government officials despite its limited material resources to monitor compliance. In contrast to the analysis of formal consultations, the government is the most central actor in the monitoring network of the Bulgarian EWL representative. In other words, despite the lack of formal consultations, the Bulgarian women’s lobby group seeks influence informally through social contacts with government officials. Furthermore, the Bulgarian CSO boosts its position by exchanging information with the Commission directly without necessarily involving national authorities in these exchanges. In other words, the Bulgarian network regularly uses opportuniti to bypass the state when monitoring the implementation of EU legislation.

This is in contrast to the networks of other national representatives of EWL group, as none of the EWL platforms in Western Europe exchange information about EU policies directly

with the EU Commission.⁴⁸ The clear European route to monitoring is in line with patterns of information politics as described by Keck and Sikkink.⁴⁹ In particular, in postcommunist countries, where citizens do not always trust that government policy will improve gender equality, citizen representatives turn to supranational channels to enforce gender equality legislation more effectively. It also indicates that the decentralized monitoring mechanism of the EU Commission relies on domestic institutions to report on implementation problems at the national level, especially in cases where state capacities to implement EU policies are considered to be weak.

In short, effective implementation of gender legislation is likely to be the result of the EWL group informal contacts with government and its direct links to the Commission. This finding creates a relatively rosy view about the impact of the EU on the strength of Bulgarian civil society. However, there are also reasons to be less optimistic about the strength of civil society in Bulgaria, more generally. Our analysis conveyed that other national civic actors within the monitoring network in Bulgaria are isolated and do not have direct access to government or supranational institutions. In particular, CSOs in the area of gender equality only exchange information with the Bulgarian representative of the EWL group as the central actor responsible for collecting information about the implementation of gender equality legislation. The lack of interactions between civic actors indicates that civil society is less developed and less involved in political processes in the area of gender equality. It also suggests that the EU impact on civil society in Bulgaria remains limited and external support only empowers some CSOs but not others. The more privileged position of CSOs with direct connections to the Commission continues casting doubt on the overall positive impact of the EU on democracy in postcommunist countries like Bulgaria. It remains to be seen whether membership in the EU will exert lasting effects on democratic developments in Bulgaria.

NOTES

1. Marc Morjé Howard, *The Weakness of Civil Society in Post-Communist Europe* (Cambridge: Cambridge University Press, 2003), <https://doi.org/10.1017/CBO9780511840012>.

Axel Ockenfels and Joachim Weimann, "Types and Patterns: An Experimental East-West-German Comparison of Cooperation and Solidarity," *Journal of Public Economics* 71, no. 2 (February 1999): 275–87.

2. Tsveta Petrova and Sidney Tarrow, "Transactional and Participatory Activism in the Emerging European Polity: The Puzzle of East-Central Europe," *Comparative Political Studies* 40, no. 1 (January 2007): 74–94, <https://doi.org/10.1177/0010414006291189>; Roberto Stefan Foa and Grzegorz Ekiert, "The Weakness of Postcommunist Civil Society Reassessed," *European Journal of Political Research* 56, no. 2 (2017): 419–39.

3. Asya Zhelyazkova, Cansarp Kaya, and Reini Schrama, "Decoupling Practical and Legal Compliance: Analysis of Member States' Implementation of EU Policy," *European Journal of Political Research* 55, no. 4 (2016): 827–46, <https://doi.org/10.1111/1475-6765.12154>; Asya Zhelyazkova, Cansarp Kaya, and Reini Schrama, "Notified and Substantive Compliance with EU Law in Enlarged Europe: Evidence from Four Policy Areas," *Journal of European Public Policy* 24, no. 2 (February 4, 2017): 216–38, <https://doi.org/10.1080/13501763.2016.1264084>.

4. Michael Coppedge et al., "Varieties of Democracy Codebook V4," Varieties of Democracy Project: Project Documentation Paper Series, 2015, <https://www.v-dem.net/en/reference/version-4-mar-2015/>.

5. Reini Schrama and Asya Zhelyazkova, "'You Can't Have One without the Other': The Differential Impact of Civil Society Strength on the Implementation of EU Policy," *Journal of European Public Policy* 25, no. 7 (July 3, 2018): 1029–48, <https://doi.org/10.1080/13501763.2018.1433709>.

6. Florian Trauner, "Post-Accession Compliance with EU Law in Bulgaria and Romania: A Comparative Perspective," *European Integration Online Papers*, no. 2009–2021 (December 18, 2009): 1, <https://doi.org/10.1695/2009021>.
7. Trauner, "Post-Accession Compliance with EU Law in Bulgaria and Romania."
8. Antoaneta Dimitrova and Aron Buzogány, "Post-Accession Policy-Making in Bulgaria and Romania: Can Non-State Actors Use EU Rules to Promote Better Governance?" *Journal of Common Market Studies* 52, no. 1 (January 2014): 139–56, <https://doi.org/10.1111/jcms.12084>.
9. Aneta B. Spendzharova and Milada Anna Vachudova, "Catching Up? Consolidating Liberal Democracy in Bulgaria and Romania after EU Accession," *West European Politics* 35, no. 1 (January 1, 2012): 39–58, <https://doi.org/10.1080/01402382.2012.631312>.
10. Gerda Falkner and Oliver Treib, "Three Worlds of Compliance or Four? The EU-15 Compared to New Member States," *Journal of Common Market Studies* 46, no. 2 (March 2008): 293–313, <https://doi.org/10.1111/j.1468-5965.2007.00777.x>; Gerda Falkner, Oliver Treib, and Elisabeth Holzleithner, *Compliance in the Enlarged European Union: Living Rights Or Dead Letters?* (Farnham, UK: Ashgate Publishing, Ltd., 2008).
11. Michael Edwards, *Civil Society* (Cambridge, UK: Polity, 2009); Marc F. Plattner and Larry Jay Diamond, "Rethinking Civil Society," *Journal of Democracy* 5, no. 3 (1994): 3–3, <https://doi.org/10.1353/jod.1994.0039>.
12. Margaret E. Keck and Kathryn Sikkink, "Transnational Advocacy Networks in the Movement Society," *The Social Movement Society: Contentious Politics for a New Century* (New York, NY: Rowman & Littlefield, 1998), 217–38; Charles Tilly and Sidney Tarrow, *Contentious Politics* (Oxford, UK: Oxford University Press, 2015).
13. Robert D. Putnam, "Bowling Alone: America's Declining Social Capital," in *Culture and Politics: A Reader*, ed. Lane Crothers and Charles Lockhart (New York: Palgrave Macmillan US, 2000), 223–34, https://doi.org/10.1007/978-1-349-62965-7_12; Paul Dekker and Andries van den Broek, "Civil Society in Comparative Perspective: Involvement in Voluntary Associations in North America and Western Europe," *Voluntas: International Journal of Voluntary and Nonprofit Organizations* 9, no. 1 (March 1, 1998): 11–38, <https://doi.org/10.1023/A:1021450828183>.
14. Axel Hadenius and Fredrik Uggla, "Making Civil Society Work, Promoting Democratic Development: What Can States and Donors Do?" *World Development* 24, no. 10 (October 1, 1996): 1621–39, [https://doi.org/10.1016/0305-750X\(96\)00062-9](https://doi.org/10.1016/0305-750X(96)00062-9).
15. Philippe C Schmitter, "Still the Century of Corporatism?" *The Review of Politics* 36, no. 1 (1974): 85–131; Oliver Treib, Holger Bähr, and Gerda Falkner, "Modes of Governance: Towards a Conceptual Clarification," *Journal of European Public Policy* 14, no. 1 (January 2007): 1–20, <https://doi.org/10.1080/135017606061071406>.
16. Schmitter, "Still the Century of Corporatism?"; Herbert P Kitschelt, "Political Opportunity Structures and Political Protest: Anti-Nuclear Movements in Four Democracies," *British Journal of Political Science* 16, no. 1 (1986): 57–85; Hanspeter Kriesi et al., "New Social Movements and Political Opportunities in Western Europe," *European Journal of Political Research* 22, no. 2 (1992): 219–44.
17. David Stark, Balazs Vedres, and Laszlo Bruszt, "Rooted Transnational Publics: Integrating Foreign Ties and Civic Activism," *Theory and Society* 35, no. 3 (June 1, 2006): 323–49, <https://doi.org/10.1007/s11186-006-9007-8>.
18. Schrama and Zhelyazkova, "You Can't Have One without the Other."
19. Mathew D. McCubbins and Thomas Schwartz, "Congressional Oversight Overlooked: Police Patrols versus Fire Alarms," *American Journal of Political Science* 28, no. 1 (1984): 165–79, <https://doi.org/10.2307/2110792>.
20. Sarah E. Mendelson and Theodore P. Gerber, "Soviet Nostalgia: An Impediment to Russian Democratization," *The Washington Quarterly* 29, no. 1 (2005): 83–96; Howard, *The Weakness of Civil Society in Post-Communist Europe*.
21. Tanja A. Börzel, "Why You Don't Always Get What You Want: EU Enlargement and Civil Society in Central and Eastern Europe," *Acta Politica* 45, no. 1–2 (April 2010): 1–10, <https://doi.org/10.1057/ap.2010.1>; Imogen Sudbery, "The European Union as Political Resource: NGOs as Change Agents?" *Acta Politica* 45, no. 1 (April 1, 2010): 136–57, <https://doi.org/10.1057/ap.2009.27>.
22. Schrama and Zhelyazkova, "You Can't Have One without the Other."
23. Susan Rose-Ackerman, *From Elections to Democracy: Building Accountable Government in Hungary and Poland* (Cambridge, UK: Cambridge University Press, 2005).
24. Robert D. Putnam, Robert Leonardi, and Raffaella Y. Nanetti, *Making Democracy Work: Civic Traditions in Modern Italy* (Princeton, NJ: Princeton University Press, 1994).
25. Petrova and Tarrow, "Transactional and Participatory Activism in the Emerging European Polity," 90.
26. Hadenius and Uggla, "Making Civil Society Work, Promoting Democratic Development."
27. Sidney Verba, Kay Lehman Schlozman, and Henry E Brady, *Voice and Equality: Civic Voluntarism in American*

Politics (Cambridge, MA: Harvard University Press, 1995); Rose-Ackerman, *From Elections to Democracy: Building Accountable Government in Hungary and Poland*.

28. Petrova and Tarrow, “Transactional and Participatory Activism in the Emerging European Polity”; Stark, Vedres, and Bruszt, “Rooted Transnational Publics.”

29. Center for the Study of Democracy (Bulgaria), “Crime Without Punishment: Countering Corruption and Organized Crime in Bulgaria” (CSD, 2009); Spendzharova and Vachudova, “Catching Up?”

30. (Bulgaria), “Crime Without Punishment: Countering Corruption and Organized Crime in Bulgaria,” 39.

31. Spendzharova and Vachudova, “Catching Up?” 49.

32. Ulrich Sedelmeier, “After Conditionality: Post-Accession Compliance with EU Law in East Central Europe,” *Journal of European Public Policy* 15, no. 6 (2008): 806–25.

33. Heiko Pleines, “Is This the Way to Brussels? CEE Civil Society Involvement in EU Governance,” *Acta Politica* 45, no. 1–2 (April 2010): 229–46, <https://doi.org/10.1057/ap.2009.23>; Reini Schrama, “Rooted Implementation-The Practical Implementation of EU Policy through Cooperative Society,” 2017.

34. Dimitrova and Buzogány, “Post-Accession Policy-Making in Bulgaria and Romania.”

35. Reini Schrama, “Swift, Brokered and Broad-Based Information Exchange: How Network Structure Facilitates Stakeholders Monitoring EU Policy Implementation,” *Journal of Public Policy* (2018): 1–21; Reini Schrama, “The Monitoring Capacity of Civil Society Networks: A Social Network Analysis in the Case of Gender Equality Policy,” *Journal of Civil Society* 15, no. 2 (2019): 123–42.

36. Sabine Lang, “Assessing Advocacy: European Transnational Women’s Networks and Gender Mainstreaming,” *Social Politics* 16, no. 3 (2009): 327–57.

37. Christopher McCarty, “EgoNet. Personal Network Software,” *University of Florida*, 2003.

38. Schrama, “The Monitoring Capacity of Civil Society Networks: A Social Network Analysis in the Case of Gender Equality Policy,” 2.

39. Heike Klüver, “Informational Lobbying in the European Union: The Effect of Organisational Characteristics,” *West European Politics* 35, no. 3 (2012): 491–510.

40. Julia Frost Nerbonne and Kristen C Nelson, “Volunteer Macroinvertebrate Monitoring: Tensions among Group Goals, Data Quality, and Outcomes,” *Environmental Management* 42, no. 3 (2008): 470–79.

41. Petrova and Tarrow, “Transactional and Participatory Activism in the Emerging European Polity.”

42. Liliana B. Andonova and Ioana A. Tuta, “Transnational Networks and Paths to EU Environmental Compliance: Evidence from New Member States,” *JCMS: Journal of Common Market Studies* 52, no. 4 (2014): 775–93, <https://doi.org/10.1111/jcms.12126>.

43. Ronald S. Burt, “Structural Holes versus Network Closure as Social Capital,” in *Social Capital* (New York: Routledge, 2017), 31–56, <https://doi.org/10.4324/9781315129457>.

44. We excluded the Bulgarian platform of women’s group itself from this analysis. Including them would bias the results, as all actors are by definition connected to the national platform.

45. Paul W. Holland and Samuel Leinhardt, “Transitivity in Structural Models of Small Groups,” *Comparative Group Studies* 2, no. 2 (1971): 107–24; Philip Leifeld and Volker Schneider, “Information Exchange in Policy Networks,” *American Journal of Political Science* 56, no. 3 (2012): 731–44.

46. Schrama, “The Monitoring Capacity of Civil Society Networks: A Social Network Analysis in the Case of Gender Equality Policy.”

47. Pleines, “Is This the Way to Brussels?”

48. Schrama, “The Monitoring Capacity of Civil Society Networks: A Social Network Analysis in the Case of Gender Equality Policy.”

49. Keck and Sikkink, “Transnational Advocacy Networks in the Movement Society.”