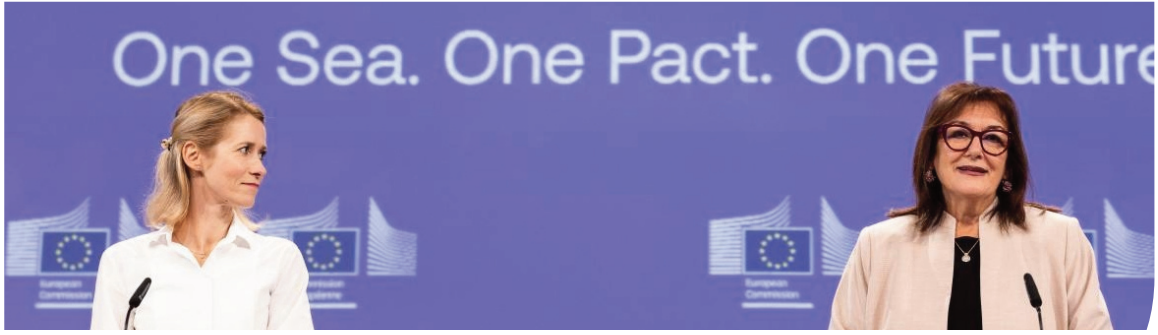

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FROM PAYER TO PLAYER? RETHINKING THE PACT FOR THE MEDITERRANEAN

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Introduction

The autumn revision of the Action Plan for the Pact for the Mediterranean is a key test to determine if the Pact is able to adapt to a region that is in massive turmoil and, in the process, avoid the fate of past Euro-Mediterranean frameworks that promised more than they ultimately delivered. Since the 1995 Barcelona Declaration, the European Union (EU) has launched the Euro-Mediterranean Partnership (EMP), the European Neighbourhood Policy (ENP), the Union for the Mediterranean (UfM), the 2011 "Partnership for Democracy and Shared Prosperity" and the 2021 New Agenda for the Mediterranean. Each signalled a new start but ultimately was overtaken by events and structural challenges.

The Pact brought institutional change at the level of the EU: a Commissioner for the Mediterranean and a new Directorate-General for the Middle East, North Africa and the Gulf. It also adopted a new working method in the form of a "living" Action Plan that favours concrete projects and is meant to be revised twice a year (Directorate-General for the Middle East, North Africa and the Gulf [DG MENA], 2026f). But this pragmatic approach will only be meaningful if it ensures that the Pact is able to meaningfully respond to the dizzying pace of developments in the region.

This brief reviews the first Action Plan and the criticism it has drawn, and sets out some recommendations on how to correct course to better respond to the region's multiple crises. In

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assessing the Pact's implementation so far, it is important to acknowledge two tension points. First, the EU's own stated wish to be seen as a player and not merely a payer around the Mediterranean.[1] Achieving this objective means that a key test for the Pact's implementation is not whether it funds valuable projects (this would be the "payer" test) but if the project helps influence events in the region (the "player" test). Second, the Pact is built on an explicitly flexible approach that "allow[s] for variable participation by partners in the implementation of the various initiatives" (European Commission & High Representative of the Union for Foreign Affairs and Security Policy [EC & HR/VP], 2025). This is based on a recognition that the Southern Mediterranean is not a homogeneous bloc and a desire to avoid the trap of the lowest common denominator which has doomed previous initiatives. But the question then becomes whether the whole of the Pact can be greater than the sum of its individual parts. In other words, do the Pact's various projects converge in supporting a collective and coherent vision for a "Common Mediterranean Space" (EC & HR/VP, 2025) or will the Pact end up encouraging, perhaps unwittingly, further fragmentation as countries compete to be tomorrow's energy gateway or transport hub?

This brief argues that if the EU wants to achieve the Pact's stated ambition to "reshape our essential relations" (EC & HR/VP, 2025) at this particularly challenging moment, then it needs to do more to respond to the region's immediate priorities and to tie its projects to a broader political and governance strategy. The brief recognises that the Pact's stated approach is to provide a "practical framework of cooperation" (EC & HR/VP, 2025). But even a pragmatic approach needs to be anchored in a political vision to be successful.

The central implementation problem is the assumption that cooperation can advance around unresolved conflicts, unaccountable institutions and unequal economic relationships without addressing their effects. Projects can proceed under difficult conditions but they cannot succeed if their beneficiaries are ultimately displaced or the resulting infrastructure is destroyed. The expectation is not that the EU can resolve the region's conflicts or single-handedly push for domestic reforms. But rather that piecemeal steps on their own will not build influence if the glue that connects them is not made more explicit. This was always the case but is even more so today given the disintegrating regional order.

Accordingly, this brief argues that the EU should use the review to make three changes. It should first better select, connect and explain how the Pact's initiatives respond to locally defined needs, notably around the current priorities of food, water access and energy. An energy initiative that aims to secure European energy flows will only be sustainable if it also contributes to affordable and available domestic electricity. Second, the review should connect the Pact even more closely to a realistic political strategy for preventing conflict and not just managing its aftermath. This means ever closer integration between the Pact and other EU and member states' political initiatives. And, finally, it should make transparency and accountability a condition of implementation, covering public spending, institutional conduct

[1] EU officials, including Commissioner Dubravka Šuica, have stated this often. See, for example, Lund Nielsen and Ionta (2024), or statement by Paula Pinho, the European Commission's Chief Spokesperson on 19 February 2026 (Nielsen, 2026).

and the EU's own decisions. Pushing for transparency and accountability is not about making the Pact serve a political agenda that the EU is not willing to endorse at this stage, but ensuring the projects actually deliver given the risks of corruption. These adjustments require choices about existing initiatives and financing, rather than another expansive catalogue of promises.

What the Pact and its first Action Plan actually contain

The Pact was launched on 28 November 2025, at the 30th anniversary of the Barcelona Process, with 10 southern partners[2] (DG MENA, 2026f). It promises a "Common Mediterranean Space" built on co-ownership, co-creation and joint responsibility, and lists more than 100 initiatives under three pillars: people; stronger and more integrated economies; and security, preparedness and migration management (EC & HR/VP, 2025).

The first Action Plan selects 21 of those initiatives for launch during 2026 (DG MENA, 2026f). It describes itself as "an operational, technical tool" for monitoring progress in the implementation of the Pact with only actions "sufficiently mature" for launch in the year that are included (DG MENA, 2026f). It is meant to be updated twice a year.

Table 1. Projects under the first Action Plan adopted in Spring 2026

Pillar	Actions	Headline EU money attached
I. People (education, skills, culture, youth, media)	8	Mediterranean University EUR 11m; Erasmus+ capacity-building EUR 15.2m; youth NEETs EUR 3m; media about EUR 0.2m a year
II. Economies (StartUp4Med, digital, T-MED energy, blue economy)	4	T-MED about EUR 600m in guarantees plus EUR 100m blending, EUR 7.4bn expected to be mobilised; StartUp4Med about EUR 470m in guarantee capacity
III. Security, preparedness, migration	9	Peace and security forum: no funding, participants "to be considered at a later stage"; several NDICI decisions still pending for Q3–Q4 2026; large border and anti-smuggling budgets (e.g., EUR 110m for Egypt's navy and border guards, EUR 140m multi-country in aligned bilateral programmes)

Note. Author's compilation of actions and funding commitments based on the Pact for the Mediterranean: Action Plan – Spring 2026 (DG MENA, 2026f).

Assessing the first Action Plan

Criticisms of the Pact and its Action Plan centre around four concerns: money, the Pact's priorities, its governance, and the depth of what it offers. But the main issue is that it reads at

[2] The 10 southern partners are: Algeria, Egypt, Israel, Jordan, Lebanon, Libya, Morocco, Palestine, Syria and Tunisia.

times as though the Mediterranean were a stable neighbourhood with a skills gap, an energy opportunity and porous borders. In reality it is a region living through war, occupation, economic shocks and a harsher climate.

Recycling old money

The first concern is that the Pact is recycling old money. As many have noted, the Plan is mostly a catalogue of existing programmes re-labelled under the Pact as it has no dedicated budget line and its actions draw on existing instruments such as NDICI, EFSD+, Erasmus+ and Horizon Europe, most of which was already programmed (Köhler, 2026; Kupfernagel, 2026; Stanicek, 2025). This is partly due to the fact that the Pact's first Action Plan arrived towards the end of the EU's 2021-2027 Multiannual Financial Framework (MFF), its seven-year budget. A key test will be whether the next multiannual financial framework, currently under negotiation, commits meaningful funds in pursuit of the Pact's strategic objectives and whether access to these funds will be simplified so a broader range of actors can tap into them (Filali Meknassi, 2026). The absence of dedicated funding is an issue but ultimately not the main challenge.

The EU already spends heavily in the region: a EUR 7.4bn package for Egypt (DG MENA, n.d.),[3] EUR 3bn for Jordan over 2025-27 (DG MENA, 2026a), EUR 1bn for Lebanon over 2024–27 (DG MENA, 2026e), a EUR 1.6bn Palestinian recovery programme (DG MENA, 2025), and the EUR 883.6m Team Gaza Initiative launched in July (DG MENA, 2026c). If the ambition is for the EU to act as a player and not merely as a payer, then the question is not just the amount of funding but whether the money is used to shape outcomes on the issues that matter most to the region's people, notably at a moment defined by war and economic shock. And this leads to the strongest criticism of the Pact's first Action Plan: its centre of gravity.

The Pact's centre of gravity

Nine of the 21 first actions sit in the security and migration pillar (DG MENA, 2026f). This represents a continuation of the EU's externalisation of border control, which may respond to Brussels' concerns, but is not the basis for a meaningful partnership across the region at this moment (MENAFem Movement, 2026). Notably, the Action Plan is mostly silent on the wars that are redefining the region preferring to separate cooperation under the Pact from the region's conflicts, which are left to a Middle East strategy that has yet to be published (Filali Meknassi, 2026).[4] Gaza, for instance, is only mentioned once in the Action Plan, in reference to a member state's contribution to a UNESCO Gaza Heritage Emergency Fund (DG MENA, 2026f, p. 13). Other important topics, such as governance, rule of law and human rights also have no action of their own; they surface only in the titles of "aligned" bilateral projects and in one line on migrants' fundamental rights.[5]

[3] According to the EU Delegation to Egypt, the EU had paid out EUR 3.5bn of the macro-financial assistance by this summer. A final EUR 1.5bn instalment is due once the remaining conditions are met (Delegation of the European Union to Egypt, 2026).

[4] The only conflict-related action is an informal regional forum for the EU and the southern Mediterranean countries on peace and security in Brussels "towards Q4 2026", with two working sessions on maritime security and counter-terrorism (DG MENA, 2026f, p. 28).

This is in line with the EU's priorities, but the question is whether these priorities are sufficiently attractive to southern governments and societies to make them the basis of a broader partnership. The region's needs in autumn 2026 are shaped by war and economic shock. In the Arab Barometer's ninth wave –which fielded in eight countries between August and November 2025– the economy is the most-cited national challenge: 60% of Egyptians and 59% of Jordanians put it first (Arab Barometer, 2026a, 2026c). Food insecurity is the starkest finding. In six of the eight countries, at least half of respondents said their household had run out of food without money to buy more, including 65% in Syria and 61-62% in Tunisia, Jordan and Egypt (Arab Barometer, 2026a).

Emigration is a key priority for the EU, but the Pact's focus is mostly on border controls. A more impactful approach could be to focus on what is driving people to migrate, and that is overwhelmingly economic reasons (Arab Barometer, 2026b, 2026d).

The Pact's portfolio touches on some of these themes, but even there, it frames things in a way that will not necessarily dent the drive to emigrate. For instance, in the Action Plan, mobility is mostly treated through the lens of migration control and "Talent Partnerships" to attract targeted numbers of skilled migrants (DG MENA, 2026f, p. 34). This may help Europe fill needed jobs and tasks, but it is not clear how exporting its talents is a priority for southern countries.

The needed corrective task is to find a way to reconcile between competing priorities and overcome the gap in expectations. The EU may have its priorities, but if the Pact is to structure a prosperous common region, then it needs to do a better job responding to the priorities of a broader range of stakeholders. One clear example is investment in renewable energy; a shared priority but where approaches are not necessarily aligned. At a time of increasing fuel costs and rolling blackouts across the Southern Mediterranean, the Pact's priorities should be for new clean energy to serve the region's own grids and consumers, not only future exports to Europe through expensive interconnectivity. The issue is again the centre of gravity of efforts, which becomes visible when one examines the scale of investments for particular renewable projects. For Tunisia, the Action Plan lists EU support of EUR 35m for solar and wind projects and EUR 22.9m for reforming STEG, alongside EUR 17.8m for the ELMED interconnector (DG MENA, 2026f, pp. 22, 24). But ELMED has also received a single EUR 307.6m grant from the EU's Connecting Europe Facility. Team Europe's total commitment to the project stands at EUR 472.6m (European Investment Bank, 2024). The pattern that emerges is that the EU destines financial resources in the hundreds of millions on infrastructure that connects the region to Europe, and only tens of millions on the domestic generation that would close the region's own energy gaps. The two are needed, but they are not being prioritised in the same way.

[5] For example, (i) support for maritime safety and security management in Libya to address all forms of transnational organised crime in line with human rights principles, EUR 5 million; (ii) human rights-based border management and search and rescue in Libya – SHARAKA, EUR 25 million; (iii) call for proposals to be launched under Human Rights and Democracy thematic budget line, Jordan, EUR 3 million; (iv) EU Shared Action on Rule of Law Progress for Libya - Exit Route (SHARP-ER), EUR 1.5 million (Annual Action Plan 2024); (v) SM 2026-2027 Building Tomorrow Together: Youth, Rights, Rule of Law, and Culture in Palestine, Palestine, EUR 36 million. See DG MENA (2026f, pp. 14, 17, 33, 37, 39).

Table 2. Examples of gap in prioritisation

Shared priorities	What the Action Plan offers	The gap with what southern stakeholders value
Jobs, trade and investment	Four economic actions, built mainly on EU guarantees to de-risk private investors (T-MED, StartUp4Med)	No new market access, no update of 20-30-year-old Association Agreements, no trade instrument at all
Mobility	Talent Partnerships: about 6,500 mobilities in 2026 across the whole region, explicitly paired with return and readmission	Mobility treated as a migration-control bargaining chip, not a people-to-people good
Security of people	Nine security, border and migration actions; large budgets for coast guards and border forces	Security is defined as the security of borders and states, rarely of citizens

Note. Author's elaboration based on DG MENA (2026f).

Governance and "co-ownership"

The third concern is governance. Critics argue that "co-ownership" exists in name only: the Pact was drafted in Brussels and endorsed by partners afterwards, and neither civil society nor parliaments have a binding role in how it is run (European Economic and Social Committee, 2025; Filali Meknassi, 2026; Köhler, 2026). Meanwhile, trade policy –arguably the EU's most powerful lever in the region– sits outside the Pact altogether (Köhler, 2026).

In their defence, EU officials argue that there is no one on the other side ready to share governance. The gap does indeed stem partly from authoritarian rule and weak democratic scrutiny in partner countries, whose governments prefer transactional deals (Köhler, 2026). In Tunisia and Egypt, the EU's migration and energy priorities have been co-produced with national governments that prefer to sideline civil society (Gibril, 2026).

But the argument is that the EU can be more creative in finding partners across the Mediterranean, even if ultimately governments are essential. Eagerness to build a new partnership exists at other levels on both sides of the Mediterranean: municipalities, universities, business, trade unions, civil society, and the large diaspora from the region in Europe, which brings capital, skills and political voice but appears marginally in the Action Plan. So, the Pact's own principle of flexibility and variable participation should apply to its governance as well as its projects.

The depth of the partnership

The fourth concern is the depth of what the Pact offers. It brings no new market access and no plan to modernise Association Agreements that are now in many cases 20 to 30 years old. Writing for ECFR, Tarek Megerisi (2026) argues that the Pact can only work if Brussels puts grand bargains on the table: comprehensive packages of investments, energy partnerships, visa programmes and infrastructure tailored to individual countries. For Megerisi, the path to success

is for the EU to go big by "lean[ing] on its large market to make partnership with Europe more attractive to governments in the region, and stop the encroachment of rivals in its neighbourhood."

A related argument is that by favouring investment-led fixes over a more wholistic approach, the Pact risks weakening Europe's comparative strength. This points to a strategic problem: an investment-led approach is unlikely to make the EU a major player, because on investment alone it is often outbid. In Egypt, the EU's entire 2024-27 package is EUR 7.4bn (DG MENA, n.d.). In a single deal in February 2024, Abu Dhabi's ADQ committed USD 35bn to develop Ras El-Hekma (Magdy et al., 2024). China's Belt and Road construction engagement in the Middle East reached USD 39.4bn in 2025 alone as Chinese firms expanded projects in energy, real estate and utilities (Kader, 2026). These figures are not strictly comparable, and the EU's economic weight lies more in trade and market access than in cheques. But the point is that the Pact is not offering any new market or trade access; rather it has decided to compete mainly as a source of capital and project finance in a market where Gulf funds and Chinese firms often offer more money, faster, and with fewer questions.

This has a political consequence. When the EU behaves as one investor among many, governments in the Southern Mediterranean treat it as one –thus returning to the payer vs. player tension. They shop between Brussels, Beijing, Washington and the Gulf, take what each offers and concede nothing on governance. The Pact then becomes another menu from which authoritarian governments order selectively, accepting money for border control here and grid investment there, while the reforms and freedoms that are ultimately needed for a prosperous region fall away. That plays to Europe's weakness rather than its strength as, ultimately, the EU's distinctive offer is not the size of its spending but a combination no other actor can provide: market access, shared rules, mobility, large and active diaspora, and a credible commitment to law and rights. A purely transactional Pact gives that advantage away.

Course correction: how the Pact should evolve

For certain critics, the Pact's architecture means there is little that can save it (Youngs, 2025). This brief takes a different approach. The Pact has an imperfect architecture and is facing major headwinds. However, it can still strengthen regional cooperation within the Pact's three pillars if it evolves dramatically to (i) respond to locally defined needs, notably around the current priorities of food, water access and energy security, (ii) connect its actions to a meaningful political strategy concerning conflicts in the Levant, and (iii) make accountability a condition of implementation, covering public spending, institutional conduct and the EU's own decisions.

Prioritising immediate needs

The region is absorbing an energy-price shock on top of a food-price shock (Arab Barometer, 2026a), with little fiscal room. The situation is likely to get worse if remittances from Gulf-based diasporas are affected by the ongoing war with Iran. The Pact should focus its priorities around a Mediterranean resilience strategy that prioritises essential services: electricity, water, food supply, social protection and education. These issues affect household welfare and business productivity simultaneously. One quick fix is for the next Action Plan to articulate more clearly how its investments and projects lead to benefits that citizens can actually observe in the short term.

For renewable energy cooperation, the decisive question should be how investment improves local access while enabling mutually beneficial trade. The EU should require project sponsors to demonstrate effects on domestic supply, affordability, land use and water consumption. Where export-oriented projects compete with local needs, their public support should depend on a defensible and transparent allocation of benefits. Grid maintenance, energy efficiency and decentralised generation for public facilities – usually perceived as not the most appealing for investments – should be considered as their impact is often more immediate than long-term large infrastructure projects.

Water and food deserve comparable operational attention. The September 2026 UfM water meeting endorsed a regional agenda and launched the Rome Initiative on Water (Directorate-General for Environment, 2026). The autumn revision should connect these commitments to financed implementation. It should favour measures that improve water availability and agricultural livelihoods: leakage reduction, wastewater treatment, smallholder access, and transparent rules for allocation during scarcity. Infrastructure financing should include the costs and institutional arrangements needed to maintain it to avoid previous experiences where critical infrastructure was completed but left idle.

What the EU can realistically do on conflict through the Pact

The Pact cannot replace diplomacy, but it cannot treat conflict as external to its implementation either. The EU's main instruments on the region's three most acute conflict files –Palestine, Lebanon and Syria– run on separate tracks: donor groups, country packages and political processes that sit outside the Pact's governance and are absent from its Action Plan. The autumn revision should try to narrow that gap with the aim of making it clear that the Pact and its projects are tied to the broader political strategy for each of these conflicts and for the Levant region.

Within that frame, the Pact's role should be defined around outcomes it can influence: protecting civilians, supporting viable agreements, preserving and building institutions needed for recovery, promoting cross-border collaboration, shifting from humanitarian response to post-conflict recovery, and ensuring compliance with international law.

The EU's influence on conflicts depends on more than aid. Trade relations, financial cooperation, governance support, diplomatic engagement and member states' national policies all affect its leverage. Europe can contribute to agreements without claiming sole mediation leadership. It can support monitoring, provide technical expertise, protect local dialogue and coordinate with regional actors, notably in the Gulf. It should concentrate on a small number of commitments whose delivery can be observed, and where the Pact complements and consolidates peace-building efforts led by others.

Palestine is the first test. The EU already co-chairs –along Saudi Arabia and Norway– the Global Alliance for the Implementation of the Two-State Solution. The EU itself told the UN Security Council that the Alliance shows the necessary link between the Gaza Peace Plan and the two-state agenda (European External Action Service, 2026). Yet the Pact's Action Plan never mentions the Alliance, and the EU's main Palestinian instruments –the Palestine Donor Group and the EUR 883.6m Team

Gaza Initiative– sit outside its governance. The autumn revision could close that gap in three ways: 1) it could use the Pact's "triangular cooperation" (EC & HR/VP, 2025, p. 3) with Gulf partners to co-finance Gaza's recovery alongside Saudi Arabia, rather than in parallel; 2) it could frame the Pact's Palestinian programmes, including EUR 30m for local governance and the rule of law and EUR 36m for youth, rights and culture, as contributions to the Alliance's institution-building agenda (DG MENA, 2026f, pp. 14–15); and 3) it could ensure that the regional energy, digital and trade corridors the Plan promotes will include Palestine rather than route around it.

The same gap applies to Lebanon and Syria. In the Action Plan, Syria's main item is EUR 80m for refugee returns, filed under the migration action (DG MENA, 2026f, pp. 34–35). The EU's substantive engagement with these two countries runs elsewhere: a EUR 620m package and a planned Technical Assistance Hub for Syria (DG MENA, 2026b), as well as a EUR 1bn package for Lebanon (DG MENA, 2026e). The revision should bring this work into the Pact through transition compacts for both countries. Such an inclusion should not simply be a copy/paste of existing initiatives in each country, but an opportunity to add a regional layer of analysis and to reflect on how EU initiatives can support and stabilise relations between the two countries. This includes cross-border issues such as border demarcation and reconnecting the Lebanese, Syrian and Jordanian electricity grids.

Making accountability part of implementation

Accountability should be integrated systematically because it addresses three recurring implementation failures that have affected previous Euro-Mediterranean frameworks. Resources can be captured by actors with privileged access. Institutions receiving assistance can misuse stronger capabilities, notably to commit human rights violations. And affected people can be excluded from decisions without a practical remedy.

The European Ombudsman's inquiry into the EU-Tunisia agreement provides a concrete lesson. It called for greater transparency around human rights risk assessment, published criteria for suspending funding, and complaint mechanisms for affected individuals (European Ombudsman, 2024). The Pact should translate this experience into common operational requirements, adjusted to the risks of each initiative. The requirement should be strongest where programmes involve security institutions, personal data, environmental impacts, displacement or contested rights (such as ownership of land). The European Commission also announced an interactive webpage to track projects by country and sector (DG MENA, 2026d). It should report results, not just activities, and include money disbursed, beneficiaries reached and problems encountered. Civil society and parliaments on both shores should have a standing monitoring role, with the European Parliament and the planned Youth Parliamentary Assembly receiving an annual implementation report.

This matters for three reasons. The EU's standing in the region rests on its claim to be a rules-based actor, and the war in Gaza has made southern publics acutely sensitive to double standards. Security assistance without oversight tends to entrench the abuses that drive instability and departures. Finally, the Treaty on European Union requires EU external action to be guided by human rights and the rule of law (European Union, 2016, art. 21). That obligation applies to money spent through the Pact as much as anywhere else.

The usual objection is that partner governments will refuse this sort of scrutiny. Some may. But much of this agenda concerns how the EU itself spends and reports, which needs no partner's consent. The Pact's principle of flexibility and variable participation also allows willing partners to opt in (EC & HR/VP, 2025, p. 3). This can

be particularly important for countries in transition like Syria and Lebanon where the Pact can introduce a layer of transparency that would otherwise not be available.

Conclusion

The Pact's ambition, a "Common Mediterranean Space" that is connected, prosperous and secure, is appealing, and the EU brings real assets to it as the region's main trading partner and one of its largest donors. What is missing is a sense of how the Pact is meant to help the region through this very difficult moment of war, occupation, and economic shocks.

The EU is not expected to fix all issues. But a payer that funds programmes while other actors shape the region's future will not win the trust the Pact depends on. A player chooses a few priorities that matter to people's lives, ties its projects to a political strategy, and accepts being held to account for the results. For the autumn revision, that means three things:

- Respond to locally defined needs: affordable electricity, water and food.
- Tie the Pact to a realistic political strategy: for Palestine, Lebanon and Syria, so that its projects are not overtaken by the conflicts in and around them.
- Make accountability a condition of implementation: covering public spending, the conduct of the institutions the EU supports, and the EU's own decisions.

None of this requires a new framework, only choices about how existing initiatives and funds are used. The October revision will show which kind of actor the EU intends to be.

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