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**Author(s):** Säre, Margit

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Non-state Actors and Local Interest Groups in the Estonian-Russian Border Region, Transboundary Lake Peipsi Area

Margit Säre*

Abstract

The processes of political change in Europe during the last few decades has posed new challenges to cross-border cooperation in general and to local development and the everyday living conditions of border area inhabitants, in particular. Estonian-Russian border communities, standing on two different sides of the EU external border already for nine years, have been a focus of interest for border researchers for quite some time. This paper intends to give insight on the dynamics of local actors in the cross-border cooperation (CBC) over the last years, while presenting some preliminary findings of the EU financed Seventh Framework Programme for Reseach (FP7) “EUBORDERREGIONS” (www.euborderregions.eu). The focus of the article is on non-state actors and it discusses the impact of EU policies and support programs to local institutions and to the local development of border areas in general.

Introduction

It is said that the paradox of the border is that on the one hand it increases the political and cultural distances between states but on the other hand it stimulates the need to create new cross-border networks between various stakeholder groups. The European Union (EU) has put lot of effort to support cross-border networks in internal and external borders of the Union. Due to the enlargement process, the length of the EU external land border has increased several times during the last fifteen years, and today, with the twenty-seven member states, the external land borders stretch to around 8,000 km.¹

State borders demand efficient security measures; but, importantly, they are also characterized by joint economic and cultural cross-border (people-to-people) contacts that need to be preserved and developed further for the sake of cohesion. This has been also the main idea behind the EU European Neighborhood Policy (ENP),² launched in 2007.

The Estonian-Russian borderland, standing today on two different sides of the EU border, has been affected by the political, economic, and social changes during the last two decades to a great extent. During Estonia’s re-independence in 1991, the whole society has gone through major reforms

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* Margit Säre works for Peipsi Center for Transboundary Cooperation (www.ctc.ee), an Estonian NGO.


² European Neighhorhood Info Centre, http://www.enpi-info.eu/
and transformations, but not all community groups have been treated equally by the “wind of change.” While the national capital and some other bigger towns are doing quite well in terms of employment and economic growth, the rural and border areas, especially a big part of Estonian-Russian border municipalities are among the poorest ones in Estonia. However, many European regions have realized that cross-border cooperation (CBC) could be one of the engines in the development of local life – remote cross-border regions could form their own centrality and efficient economic, cultural, touristic etc. CBC could make valuable contributions to the promotion of local economies.


The EXLINEA project final report from 2005 concludes that in the Estonian-Russian case, “the political interstate relations are seen as one of the most important obstacles for developing cross-border cooperation (CBC), where the governments of both states are seen as unsupportive of CBC. CBC remains over-politicised with the central level constraining the local level in its attempts to promote CBC.”

The EUDIMENSIONS final report from 2009 mentions already more support from the central government side to local CBC. However, it also says that CBC in the Estonian – Russian border area much depends on EU funding, and between program periods little activity takes place. Roll stresses that in order to promote more initiative in the development of border areas by diverse CBC actors, there is a need for a more active process in establishing Euregios and other cross-border cooperation structures at the local level as well as to find necessary resources to ensure stable work for those cross-border organisations.

During the years 2011-2016 another EU 7th Framework Programme project “EUBORDERREGIONS: European Regions, EU External Borders and the Immediate Neighbours – Analysing Regional Development Options through Policies and

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Practices of Cross-Border Co-operation,\textsuperscript{6} has been implemented, with the main objective to identify challenges to economic, social and territorial cohesion as well as regional development potentials in different borderlands at the EU’s external frontiers. Within the project the Estonian-Russian case study research – containing CBC stakeholder mapping, media analysis, stakeholder interviews and observations – is being organized during the years 2012-2013. Thus, the EUBORDERREGIONS project provides us with an opportunity to see if local stakeholders in the Estonian-Russian border area have gained more sustainability in their activities and how local communities perceive and interpret local/regional development and EU policies.

Estonian-Russian Border Communities and People on the Border

Estonia is a country with a territory of around 47,000 km\textsuperscript{2} and a population of only 1.4 million. Despite the smallness, the country’s location at the crossroads of East and West has made it the focus of political interest for several big European powers throughout its history.

Estonia shares with Russia a 460 km border. 122 km of the border (26 per cent) goes through the sea; 200 km (or 49 per cent) through large bodies of water, including Lake Peipsi/Chudskoe and Narva River; and 138 km on land (30 per cent). The border communities on both sides are mostly rural and rather scarcely populated, especially on the Russian side. The biggest border city is Narva on the Estonian side has approximately 64,000 inhabitants,\textsuperscript{7} while the other towns/villages have less than 3,000 inhabitants.

During the years of Estonian independence, big demographical changes have also taken place in the area. Depopulation of the Estonian-Russian border region municipalities has been taking place faster than the average in Estonia. As with the national trend, it is mainly the younger generation who have left the area to move to bigger cities for better educational and employment opportunities. When in 2001 26 per cent of the people in the region were in

\textsuperscript{6} EUBOREDERREGIONS project website: www.euborderregions.eu

\textsuperscript{7} Narva town government, www.narva.ee
the age group 0-19, by 2010 this had decreased to 21 per cent.\(^8\) As a result of this, over the last decade the region has seen several gymnasiums and vocational schools close. For example, Kallaste Vocational School, which was closed in 2004, was the only regional school and provided training in inland fishing.

It could be said that despite the economic growth in the capital areas of both countries, the Estonian-Russian border area has remained underdeveloped, peripheral and isolated in many senses. The socio-economic differences between the centers of both countries and the border region are increasing, which is indicated by depopulation, lack of educational institutions, working places and many other disparities.

**Non-state Cross-Border Cooperation Actors**

Different levels of governance should be distinguished when talking about CBC. For example, the interests and motivations of central governments regarding inter-state cooperation can differ from those of regional and local governments and other stakeholders. Regional and local authorities that directly depend upon local constituencies are more concerned with issues related to the social and economic aspects of the border area, the wellbeing of citizens, and non-traditional security issues.\(^9\)

Over the last few decades the role of conventional inter-state relationships has remarkably decreased and new cross-border actors and patterns have emerged. Today we can see all different kinds of interest groups, NGOs, enterprise networks, regions etc. who shape international relations. The role of the European Union in the involvement of non-state actors in European politics, their visibility and impact has been vital.

It is believed that the more significant role of civil society organisations in international relations in the last decade owes much to the general processes of the development of communication technologies, which did not exist twenty years ago. Modern communication channels help to build and strengthen networks within the country as well as across the border with similar institutions. The modern IT communication technologies bring the topic of CBC also closer to the younger generation and to those who do not have personal contacts from the other side.

Alongside the above-mentioned background, it is also suggested that an important goal for including all civil society groups in policy-making contexts is to acquire information as good policies are based on appropriate technical, social and political information.\(^10\) Very importantly, civil society groups, through their research and their grassroots bases, can contribute to the understanding of social and territorial issues in specific contexts that would be difficult and expensive to study. However,

\(^{8}\) Estonian statistics, www.stat.ee


\(^{10}\) Carlo Ruzza, “Organised Civil Society and Political Representation in the EU Arena,” in Civil Society and International Governance, eds., David Armstrong; Valeria Bello, Julie Gilson, Debora Spini (Abingdon: Routledge, 2011)
there is a risk that groups that cooperate and interact too closely with government officials may end up being effectively co-opted into quasi-governmental functions.\textsuperscript{11} This risk is probably higher in countries where civil society organisations (CSO) are more dependent on national and EU/foreign funding – which is the case for many Estonian and Russian NGOs or in the countries where several restrictive legal acts apply to NGOs. In the latter case, an example of Russian NGO law is relevant. In 2012 it became a requirement that all non-commercial organizations (NCO) register with the state prior to receipt of funding from any foreign sources, in order to be determined “NCOs carrying out functions of a foreign agent.”\textsuperscript{12}

Probably one of the most important factors in the mushrooming of different informal cross-border networks initiatives has been EU funding. Fifteen Programmes have been established under the European Neighbourhood and Partnership Instrument Cross-Border Cooperation (ENPI CBC) for the period 2007-2013, amounting to almost €12 billion.\textsuperscript{13}

However, as also suggested in EUDIMENSIONS project final report,\textsuperscript{14} the influence of the external environment, particularly the role of the EU in shaping the agenda of the civil society sector, is not entirely positive – it can at times hinder the pursuit of the goals of CSOs. As often happens, externally defined agendas and priorities rather than local issues may become the focus of civil society cooperation simply because money is available. As the case studies from previous projects show, small and locally oriented CSOs do gain valuable experience through externally dominated networks, but it also tends to “deform” them in terms of their outlook, self-image and practical work.

Still, in the end it could be said that the dependency on foreign funding might have many negative effects, still through the aid, representatives of civil society gain higher expertise and professionalism, which would definitely benefit local border communities.

**EUBORDERREGIONS Project First Phase: CBC Mapping of the Estonian-Russian Stakeholders**

The FP7 EUBORDERREGIONS project, implemented during 2011-2015, aims to investigate the manifold consequences of increasing cross-border interaction for the development of regions at the EU’s external borders, while the research focus is to conduct eleven in-depth studies of development challenges and potentials.\textsuperscript{15}

The project research methodology includes: CBC stakeholder mapping, media analysis, stakeholder and expert interviews and observations. The mapping process of the Estonian-Russian stakeholders, active in CBC, was started in summer 2012, with the selection of the main stakeholders

\textsuperscript{11} David Armstrong, Julie Gilson, “Introduction,” in *Civil Society and International Governance*, ed., David Armstrong, Valeria Bello, Julie Gilson, Debora Spini (Abingdon: Routledge, 2011)

\textsuperscript{12} The International Centre for Non-profit Law, accessed 3 January 2013, http://www.icnl.org/


\textsuperscript{15} EUBORDERREGIONS project website, www.euborderregions.eu
using snowball sampling. As a result an exhaustive matrix and preliminary dossiers of key-actors (i.e., stakeholders) that are active in different sectors in the selected border area, were compiled.

Through the mapping exercise 70 organisations and institutions were identified, which are active on the Estonian side, having more or less contacts/interest for the cooperation with the Russian side (see Table 1). The mapping did not include not only organizations in the border municipalities but also the ones based in the national capital (mainly ministerial units, international organisations), who have a clear interest for the development of CBC. At the same time, the websites of these organisations were analysed for information on an organisation’s interrelations with the Russian side.

The organisations were divided into three major groups:
1) Public/Governmental sector:
2) Civil organisations/NGOs
3) Private companies, media

Table 1. Stakeholders on the Estonian Side of the Border

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Not surprisingly, the biggest number of stakeholders were identified in the public sector – 41 organisations (59 per cent of the total), which have usually stable financing from the state budget and can afford costs for international relations, visits, twin city activities etc. Under this group most numerous are rural municipalities and towns (n=29). We identified also county government departments, public schools, institutes of higher education and municipal museums, which run some joint projects and cooperate regularly with their Russian counterparts. Private sector organisations and business associations formed only 11 per cent of the total – or eight organizations in the border area municipalities who have active business cooperation with their counterparts on the Russian side. Non-profit sector representatives included foundations, NGOs and religious organisations – all together 21 organisations (30 per cent of the total) on the Estonian side.

As a next step to the mapping phase, a longer formalized cross-border questionnaire is being filled out by stakeholders on both sides of the border (estimated to be around 60 on the Estonian side, and 60 on the Russian side), in the fall and winter of 2012/2013. In addition, expert interviews are also being conducted (in total, there will be around 20 Estonian and 20 Russian interviews) as well as observations in border crossing areas.

As a result of the stakeholder mapping phase and their website analysis of 21 civil society organisations (CSOs) it cannot be said that some fields are much more popular than others; the sectors of CBC vary from fisheries management to cooperation between cultural groups or universities.

Still, half of the CSOs are active in local culture and tourism promotions or municipal cooperation, while environmental or research activities are less represented.
The biggest part of CSOs and NGOs active on the Estonian side of the border area are those involved in the (cultural, nature, water) tourism development. Examples of this group are the NGO Peipsi Region Tourism, Emajõe Barge Society, and others; these organisations have realized the uniqueness of the Lake Peipsi area cultural and natural heritage and disseminate tourism related information, organize tours on land and on water. Until now most of the Lake Peipsi/Narva river basin tourism related projects have been realized only unilaterally but the Emajõgi Barge Society, who restored the historic Lake Peipsi barge, have an idea to start cross-border water tourism tours with the Russian side. However, talk about cross-border navigation or water tourism is totally absent now because of the lack of political will but also because of the water infrastructure (border cross, custom points) at Lake Peipsi/Chudskoe ports.

Sustainable tourism should be seen as an essential element in the economic development of border regions, and cooperation in this field helps the regions to create a better range of tourism and environmental products; to improve joint promotion and marketing, improvements in infrastructure etc. are needed. Against that background, with the support of ENPI Estonia-Latvia-Russia Program, several new tourism related projects started in 2011 – for example, the large trilateral Via Hanseatica project or joint cultural tourism related project of twin cities Narva/Ivangord fortresses.

NGOs in Setoland have been very active in different EU-financed CBC projects – in the south of the border, these NGOs aim to promote cultural and historical heritage and they also cooperate actively with Seto organizations on the Russian side of the border. When Seto ethnic organizations are actively developing tourism in their region, then another ethnic/religious group – Old Believers – organisations (in the central part of the Lake Peipsi area) work mainly with the preservation of ethnic/religious identity and their attitude to the tourism development is rather careful.

Regional Development, Municipality Cooperation

Another important group of CSOs in cross border cooperation are the regional municipality associations – for example, the association of Setoland municipalities or county municipality associations.

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16 Emajõe Barge Society website, www.lodi.ee
18 Seto people live in the southern part of the border, on both sides of the frontier. Now, this community has a population of about 4,000 people, with only 100 people living on the Russian side of the border. Although culturally Setos are more similar to Estonians than Russians and their language is considered one of the southeastern dialects of Estonian, they have been deeply influenced by the Russian culture and Orthodox church.
associations; and the ones dealing with regional development or inter-municipal CBCs in larger territories.

An important actor for regional sustainable development projects is the NGO Peipsi Center for Transboundary Cooperation, which has been active since 1994, and their Russian counterpart NGO Lake Peipsi Project. Together, they are organising annual multi-stakeholder conferences – Peipsi Forum – or CBC summer schools and children environmental education activities.

There is also Pskov-Livonia Euroregion that was established in 1996, with the main aim to reinforce economic, social and cultural progress in the Estonian-Russian-Latvian border municipalities. Initially, the Euroregion had a strong desire to create a border structure similar to the existing Euroregions of Western Europe; however, the reality shows the Pskov-Livonia Euroregion, as are the many other CSOs in the region, is very much dependent on external funding and does not find enough resources to establish a permanent secretariat with a full-time staff.

For this group of CSOs involved in the regional development or inter-municipal cooperation, it has been somewhat easier to make their interest heard at the national level, as many of them are formed by public institutions or municipalities, and that is why they also have closer communication with political decision-makers.

Other Groups of CSOs: The Environmental, Religious, Educational Organisations etc.

There are several organisations in this multi-cultural Estonian-Russian border region, based on national, ethnic or religious identity. In addition to Setoland organisations, there are several associations from the Russian speaking population of North-eastern Estonia. Those people usually have family links to Russia or other former Soviet republics. Today multiple cultural societies in North-eastern Estonia are active in promoting their culture and languages through diverse cultural events organised in the region, and keep contacts with their historical motherlands.

The work of CSOs involved in environmental, water and fisheries management is an obvious field for cooperation as two-thirds of the Estonian-Russian border is covered by a large body of water – Lake Peipsi. Peipsi (or Chudskoe in Russian) is the fourth largest lake in Europe with respect to surface area and the biggest transboundary lake in Europe. Thus, environmental protection, water management issues and environmental education has been one the most popular fields of CBC projects by governmental or non-governmental organizations since Estonian re-independence (for example NGO Peipsi Center for Transboundary Cooperation has been organising dozens of water management or environmental education projects with their Russian counterparts). The environmental field is also naturally easier for establishing cooperation, as its technical nature tends to make it less politically controversial, and the benefits are more obvious than in many other potential areas for cooperation.

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19 Peipsi Center for Transboundary Cooperation website accessed 30 August 2012, www.ctc.ee
20 Margit Säre, “Estonian-Russian Cross Border Cooperation” (presented at Durham University summer school Boundaries and Water, 13 July 2010).
For example, the Development Association of Peipsi Fishery Area was established in 2008 with support from the European Fisheries Fund. This is an association of local fishermen, NGOs and residents that promote and support sustainable fisheries development in the transboundary Lake Peipsi area. With training, and through a grant program, they support also fishing-related tourism and the regeneration of coastal villages, and the diversification of activities of fishing companies. Interestingly, amateur fishermen play an important role during winter – generally an off-season for tourism – when professional fishing is stopped. From November through March the lake is generally frozen over and the most visible form of fishing are the ice fishing activities – and this is the main time of the year for fishing tourism.

Obstacles and Challenges of Cross-Border Cooperation for the Non-governmental Sector

Based on the EUBORDERREGION project mapping results, the first interviews with CSO representatives and also earlier research, done by the Peipsi Center for Transboundary Cooperation, the following factors, which affect the work of CSO in the Estonian-Russian border area, can be named: a lack of funding for CBC projects, visa and language obstacles, and weak policies for regional development in border areas.

Lack of Funding for Cross-border Cooperation Projects

The major challenges concerning CSOs are the lack of funding to support joint Estonian-Russian projects, and the bureaucratic character of the European Union funding programmes. When the EU pre-accession instruments Phare CBC, Tacis CBC, Sapard etc. offered many possibilities for cooperation for local stakeholders until the early 2000s, the EU funding period 2007-2013 was already less favorable for local NGOs and municipalities because of the bureaucracy and strict administrative rules.

Local stakeholders pin their hopes on the European Neighborhood Policy Instrument. Launched in 2007, it aims at supporting the achievement of the objectives of European Neighbourhood Policy (ENP) with a view to establishing an area of prosperity and good neighbourhood relations between and with ENP partner countries and Russia, and to “avoid the emergence of new dividing lines between the enlarged EU and its neighbours.” 21 There are all together fifteen ENPI cross-border cooperation programmes, identified on the external borders of the EU, including the ENPI Estonia-Latvia-Russia Program. For the period of 2007-2013, an overall budget of a programme supporting CBC between Estonia and Latvia with Russia (Pskov and Leningrad regions) is 65.3 million euros. The Programmes’s first round for application was opened in 2010 and had aroused a lot interest among applicants. All together 226 projects were submitted to the first round but only 25 were selected to receive 25 million euros. 22 This means that the support rate

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21 EU Neighborhood Info Center, http://www.enpi-info.eu
22 Estonia-Latvia-Russia Programme, www.estlatrus.eu
was less than 10 per cent. Unfortunately a very limited number of NGO projects received funding and so a low percentage of supported projects caused considerable frustration among local stakeholders (as a lot of money and energy was invested in writing those proposals).

The second round of applications in 2011 aroused even higher interest – 333 concept notes were submitted and only 36 were selected to submit a full proposal for further selection. On the second and last round of the Programme only 7 million euros were scheduled to be distributed.

The results of the two application rounds aroused enormous interest amongst stakeholders for beginning joint projects with their Russian counterparts. However, there are very few sources of funding for joint actions. The current funding period, 2007-2013, of the EstLatRus Cross Border Cooperation Program had only two application rounds; the budget, priorities and all the other details for the next funding period are still not decided.

Unlike state agencies, CSOs (in the region) do not usually receive funding from their states to sustain offices and staff, and are working mainly on a project-basis. However, involvement in EU programmes requires professional administrative and financial personnel; otherwise, it is impossible to comply with the programmes’ financial and other requirements. Many smaller NGOs who have interest in working with Russia simply do not apply to ENPI programmes as they “do not have enough money to pre-finance the activities and then wait and fight with the Secretariat with each penny we have spent.”23

One can conclude that the constant bureaucratization of EU programmes and unfavorable funding schemes for small stakeholders, excludes them even from the application rounds and later from the circle of grant receivers. This further excludes them from international networking events or the possibilities for professional development.

**Obstacles in Practical Matters: Visas and Language**

Obtaining visas for travel from Estonia to Russia is considered by the border region CSOs to be one of the impediments to the CBC. The visa fees applied by Russia have been substantially reduced by aligning them with the Schengen visa fee, being now 35 euros; however, an addition 21 euros must be paid to the visa service center. In addition, it takes a lot of paperwork and time (at least 10 working days) to apply for a visa. For the people living in the border area, border crossing is an especially important issue. Before Estonia joined the Schengen Zone, local people who had relatives and family graveyards on the other side of the border could cross the border with special permission, later visas were issued free of charge, but all the exceptions are not in place today. A school teacher in Põlva County mentioned in an interview in June 2012 that “I know many pupils in our school who have been all over Europe, but not to Pechory [Russia], which is just 30 km from our town, as it just takes too much time and money to go there. If you do not have a visa, there is no way you can go to Russia as an impulse trip on a weekend.” However, for cultural organisations it is possible to apply for visas for free (according to the Estonian-Russian agreement) and thus different choirs, school

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23 Quote form an interview with a Tartu County NGO official, August 2012
In other European Schengen border regions, there have been some recent positive examples regarding how the visa issue has been solved for border inhabitants. Namely, in 2012, Norway and Russia introduced a visa-exemption for the inhabitants in a 30 km zone on each side of the border, which is the first such regime in a joint area between a Schengen member state and Russia. Cross-border contacts increased sharply over Europe’s northernmost border check-point, the Storskog-Borisoglebsk land border, or twice as many as compared with two years ago.24 Also Russia and Poland moved to open the border between Kaliningrad and neighboring Polish communities for visa-free travel in August 2012. However, during informal talks with the Estonian border region inhabitants, not much support is given to the Estonian-Russian visa-free travel, with the main fear being security issues.

In addition to the visa issue, the absence of a common lingua franca in Estonian-Russian CBC is also a problem for some generations – i.e., young middle-aged and young Estonians usually do not speak Russian any more (while the older generation still hold the knowledge form Soviet times), while preferring English as their first foreign language. At the same time, in Russian border municipalities and Russia-based NGOs, English is not widely spoken, which often causes problems during preparations for and implementation of international projects.

Weak Policies for Regional Development in Border Areas

Additionally there is little political support from the governments for the border areas. Today, both Estonian and Russian governments have weak regional development polices and an absence of clearly formulated state policies towards the border regions.

The mayor of the local municipality in Jõgeva County commented in the interview that “Ten years ago we had much support from the central government side. Now everything is taken away, they do not care how we live here. We are supposed to apply for all kinds of EU projects but we don’t have any money to cover co-financing.” Also several other local stakeholders complained in interviews that the state is “moving out” from peripheral regions, and that less and less governmental support is given to municipalities, to schools etc.

Finally, it could be said that several named obstacles to border regions development discussed in previous border research projects still remain, namely the burdens caused by EU financial mechanisms, visa issues, and a lack of support from central governments. The often named visa issue is mainly an obstacle for the tourism sector, as it does not allow for travellers to take impulsive trips across the border. However, as there are already a couple of initiatives in other parts of Europe, this problem might also be a thing of history in a couple of years. On the positive side, for the cultural sector organisation, visas have been issued free of charge already for several years.

The issue concerning the absence of central government support for border areas has been a

topic raised in interviews with local stake-holders in earlier research projects. As the Estonian-
Russian border region is constantly de-populating (fewer voters) and there are few important
industries, it is quite difficult to grab the government’s attention to the region. Still EU support in the
border region is highly visible. Many people see the big role of the EU programmes in making
investments in roads, railway, water infrastructure etc. Also, a positive side to the CBC funding issue
is the opening of the ENPI EstLatRus Programme in 2010, although interest in fund from the
programme has been around 10 times greater than its budget.

Conclusions

Besides efficient security measures, the border areas are also characterized by joint
economic and cross-border cultural contacts that need to be promoted further for the sake of the
European Union and the stability and security of its border regions. Over the last few decades new
cross-border actors and patterns have emerged and we can see all different kinds of interest groups,
NGOs, enterprise networks, regions etc. that have shaped international relations. The same
diversification and multiplication of actors has also taken place in the Estonian-Russian borderland
during the last two decades, while the important role in this increase of actors is played by the EU
through its different programs.

The EUBORDERREGIONS project mapping exercise of the Estonian-Russian cross-border
cooperation stakeholders in summer 2012 showed that the number of CBC actors is still rather
limited, while the biggest role is played by public sector organisations. CSOs on the Estonian side of
the border are mostly involved in the (cultural, nature, water) tourism development or also regional
development and inter-municipal cooperation issues.

Unlike state agencies, CSOs do not usually receive funding from state budgets to cover their
office or staff costs and are working on CBC projects on a project-basis. However, with regular EU
funding, there is also a risk of EU programs shaping the agenda of civil society in a way that hinders
the achievement of the goals set by CSOs or making them aid-dependent. The recently opened ENPI
Estonia-Latvia-Russia Cooperation Programme covers only a small percentage of the funding needed
for local CBC activities and there are very few other funding sources for local CBC projects.

One can also conclude that CBC at the regional and local levels is very much influenced by
EU policies and programmes but also by the legal basis and general political climate between the
countries, which is in a great extent set up by central governments. For the sake of development of
EU external border areas, the opinion of the civil society actors should be taken into account more
seriously.