

Kehys ry:n kokoama vastaus Euroopan komission avoimeen konsultaatioon EU:n rahoituskehyksistä

Evaluations - Looking at past experience

Development Cooperation Instrument

7. How well do you think the DCI has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency; EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

The evaluation of the DCI concludes that the DCI has maintained its focus on poverty reduction. Efforts should be stepped up in mainstreaming democracy and human rights including gender equality and persons with disabilities.

Gender should be clearly visible in all programmes, in results statements, resources dedicated to gender equality, and in the approaches taken in the day-to-day implementation. This is not the case in the large majority of programmes today. Further steps also need to be taken in the application of development effectiveness principles across the board, to increase transparency, accountability, local ownership and focus on results. The results framework of the DCI should incorporate more qualitative results, not just quantitative.

The role and potential of civil society organisations is not sufficiently taken into consideration in a strategic way. The DCI should have a greater focus on building enabling environment for civil society. This should not be done only through the CSO-LA programme, but it should be an element taken into account in all DCI programmes, including in the MIPs.

Overall, the design of the DCI instrument combines country programmes, thematic programmes and the programme for support to CSOs and local actors in a good way, but in the implementation, there are issues to address. An aspect mentioned in the evaluation is the heavy administrative burden on EU Delegations, which makes it challenging for them to fulfil their roles. The heavy procedural requirements continue to pose challenges both to EU staff and to grant beneficiaries. The limited staff resources in many EU Delegations are not in line with the high level of funding and the respective programme management responsibility.

8. How well do you think the DCI has addressed the objectives of development co-operation more specifically in Least Developed Countries? To what extent has the DCI had an impact on poverty reduction

and sustainable development in Middle Income Countries, where pockets of poverty persist and which may play a critical role to tackle regional and global challenges?

The DCI has to a large extent played a positive role in helping the EU meet its objectives of development cooperation in Least Developed and Middle-Income Countries. The specific programme within the DCI aimed at strengthening civil society, as well as the contributions of CSOs in the implementation of other parts of the DCI has been a fruitful partnership between EU and CSOs in the fight against poverty. Not least in Middle Income countries the thematic EU programmes and instruments play an immensely important role in strengthening democracy, human rights and taking on remaining poverty, discrimination and inequalities. Least Developed Countries need more overall investment and support overall.

The facing out of development cooperation in Middle Income Countries needs to be compensated with thorough analysis of the characteristics of poverty in the country, and well thought out investment in human rights and strengthening of civil society organisations representing and supporting people who are discriminated against or under-serviced.

On another note, a concern exists among civil society organisations that the overall focus on return and readmission of irregular migrants is a major objective of the work financed by the EC development funding in recent years (and especially post-Valetta). This focus seems to overtake the fact that development and migration are overall seen as a positive element in the progress made in societies. The current narrative links to the “overall politicization of aid” where policy priorities from the EU member states, such as migration or security policy goals, are directly translated in funding. Since the Valetta summit, the priorities in the Agenda for Change of concentrating resources to Least Developed Countries seems to have been at least partially abandoned. Instead, more resources are being concentrated in countries who are situated along the migration routes to Europe.

9. The evaluation has found that many partner countries often disagree on the place and weight to be given to human rights issues and governance, which are part of the principles that guide the external action of the EU, including the DCI. Has the DCI enabled the EU to project its principles and values (e.g. democracy, the rule of law, human rights and fundamental freedoms)?

The DCI has to some extent enabled the EU to project its principles and values (especially democracy, the rule of law, human rights and gender equality), but there should be a greater emphasis and intention towards that end. The EU could make better use of its civil society and democracy roadmaps to support this objective.

The reluctance of some governments on human rights and governance issues can challenge the principle of ownership. This is however one of the reasons why involving local civil society, and in particular those organizations and individuals who defend human rights, fundamental freedoms, democracy and the rule of law, is particularly important. These questions are critical for sustainable development and should therefore not be left out of the EU’s external action, especially not in light of the shrinking civic space in many countries. A combination of support to human rights and CSOs, together with diplomacy and political dialogue is needed.

It is also important to ensure that the EU practices what it preaches, and that bigger attention is given within the EU to these matters. This can only strengthen the EU's legitimacy in engaging in dialogue with partner countries on these issues in a meaningful and equal way.

The DCI, and more specifically its thematic programmes have contributed to promoting cross-cutting topics in the international arena, such as land governance, promotion of the VGGT and RAI. It is, however, less clear and evident, in how far such themes have been systematically and coherently integrated and applied in other EU funding instruments, EDF and bilateral assistance included.

10. The DCI accommodates internal EU policy concerns, such as migration and climate change, in external action. To what extent do you think the DCI has been able to adapt to shifts in policy and the external environment?

The main objectives of DCI should be reduction of poverty (TFEU art. 208), and promotion of human rights and sustainable development in developing countries (TEU art. 21(d)). EU's internal policy concerns should not blur these objectives in any way.

The adoption of Trust Funds has allowed flexibility and faster awarding of contracts, yet it seems the main use of them has been to return funds back to the Member States by awarding contracts to their development agencies.

11. If you have any other views on the DCI you would like to share, they are welcome here.

We would like to emphasise the critical importance of the CSO-LA programme, and especially DEAR, which is very relevant sub-programme for supporting global citizenship education in Europe. The minimum and maximum allocations in the calls should be much smaller. We appreciate and welcome the proposal to move towards annual thematic calls, yet warn against supporting only large consortia.

Funding for sexual and reproductive health and rights should be significantly increased as a European reaction to the Global Gag Rule of the U.S. administration.

EU should also contribute more to supporting and developing education path from primary education to higher education. Access to primary education has markedly improved with the MDG agenda and efforts should now be taken to increase access to secondary and higher education as well.

European Development Fund

12. How well do you think the 11th EDF has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency, EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

We are disappointed to find that some of the EDF envelopes are far from delivering on the agreed baselines of 20% allocation of funds to human development and social inclusion, and climate action respectively. Both currently represent approximately 14% of total NIPs (NB health and education alone amount only to slightly more than 10%). Programming NIPs should be done with the objective of delivering on existing benchmarks.

The big majority, if not all, NIPs refer to gender equality as a crosscutting issue, in line with the Agenda for Change. However, this focus is not translated in the specific description of EU support under the focal sectors. Amongst the 74 available NIPs 28 include some reference to gender equality, be it as part of the overall context in the country or under one of the sectors, but fail to reflect this concern in the suggested programmes. Ten NIPs affirm that gender equality will be mainstreamed, but there is no indication of e.g. gender-sensitive budgeting or gender elements on the NIP evaluation matrix within the sectors. Only 18 NIPs include details of how gender will be mainstreamed throughout the different focal sectors. Moreover, only one ACP country specifically targets funds to this end.

13. Has the 11th EDF, for which partner country ownership is a specific feature, reflected the views of beneficiary countries and the full range of their constituencies (including civil society organizations)? Please feel free to provide some specific examples.

Due to the fact that the Cotonou Agreement (CPA) establishes that CSOs should be 'involved in consultation of cooperation strategies', consultations in country programming are more frequent in ACP countries than in countries outside this partnership. However, these are often more validation exercises than consultations, with little influence over final decisions. CONCORD EU Delegations Report 2017 highlighted the fact that some EUDs are making a real effort to improve the quality of the consultation and that good practice exists. However, 'different formats are reported for consultations and meetings and the quality varied largely depending on the country and on the perception of the participating organisations'. Moreover, some CSOs note that the actors 'consulted are usually beneficiaries of EU financial assistance'. According to the survey that is at the basis of that report, CSOs point out that there is 'limited follow-up on dialogue processes. Communication is an important precondition for effective dialogue, and one in which the EUDs should invest more resources, as most CSOs reveal a general lack of knowledge about the EU's instruments and tools for engaging with civil society'. In addition, the study found out that the EUDs' dialogue with civil society is generally conducted with NGOs in the capital city, while actors giving a broader representation of civil society, such as trade unions or community level organisations, are left out of the processes.

Moreover, CSOs participation has been threatened by the growing number of countries adopting restrictive legal frameworks or actions, both at ACP and EU level. Finally, despite some engagement with CSOs from the EUD for the national indicative programmes, this is not the case for other EDF envelopes, such as regional or even intra-ACP - only once did the EC organise a consultation for this envelope under the 11th EDF.

14. Do you think the regional and intra-ACP cooperation is efficient, effective and coherent with country level actions? Please provide reasons to support your response.

There seems to be indication that the different EDF envelopes do complement each other at some levels, namely due to sector concentration, in addition to the value of joint programming that the funds are subject to. This complementarity and coherence however is not applicable when it comes to other mechanisms that the EDF is resourcing. The EDF regulation already foresaw the promotion of innovative instruments, such as blending grants

/loans; but recent years brought in more new mechanisms than originally expected with many of these applied to Africa, such as the Africa Investment Facility, the soon to be approved African Investment Platform under the EFSD or the EU Trust Fund for Africa. These examples do not seem to be programmed in the same way as EDF traditional envelopes, leading to lack of transparency and information on possible complementarity. Moreover, there is still no publicly available information that shows additionality in these fronts, nor positive impact in terms of development outcomes. Such thorough monitoring /assessment should be applicable especially to the abovementioned benchmarks that fall short of being implemented in the NIPs (human development and climate action).

15. If you have any other views on the EDF you would like to share, they are welcome here.

To ensure that the EDF leaves no one behind, CSOs need to be consulted at all levels of the programming. This implies that the upcoming midterm review includes a dialogue mechanism with CSOs while doing the review in-country, not just through an online consultation.

Support the progress of ACP countries in implementing Agenda 2030 by engaging in regular dialogue with local CSOs to assess the impact of EU and Member State policies in those countries, address incoherencies and support civil society efforts on the ground. The EU roadmaps for engagement with CSOs could play an important role in this regard.

Include a commitment in the MTR of the EDF to provide the adequate financial support to ACP and EU CSOs at local, national and regional levels to develop their capacity. Furthermore, to allow them to enhance intra-ACP CSO cooperation and dialogue, as well as to support information sharing, dialogue and joint actions between ACP and EU CSOs. This commitment should be translated into broader and more diversified CS envelopes under NIPs and more opportunities for CSOs to work under the focal sectors.

Establish multi-stakeholder monitoring mechanisms to ensure that there is complementarity between grants and loans/guarantees in the long-run and that engagement of the private sector outweighs extra costs/risks for sustainable development outcomes that could be achieved by public finance, notably by ensuring that all recipients of EU funds are held accountable to the same transparency and reporting standards.

Ensure that existing benchmarks are properly met, such as 20% allocation of funds for both human development and social inclusion or to climate action. Take advantage of the MTR and first phase of GAP implementation to ensure gender equality is properly mainstreamed and targeted under all EDF envelopes with appropriate resources.

Ensure complementarity of the EDF with other programmes through a thorough analysis based on the MTR to guarantee an appropriate mix of funding modalities, and adequate support to all key sectors based on the country analysis and needs, as well as the division of labour at country level. Additionality of funds to specific programmes should be balanced with the necessary diversification of modalities and not at the expenses of certain areas, risking to create orphan sectors.

Ensure that sufficient attention is given to strengthening administrative and tax systems to make domestic resources mobilization (DRM) more progressive and efficient, build pro-poor fiscal systems, and enable ACP countries to raise necessary revenues and tackle tax avoidance and illicit financial flows – this should be done not only when countries have Good Governance and Development Contracts, but also where there is budget or sectorial support.

In parallel, CSOs need to be supported in their role as watchdogs and representatives to ensure that domestic resources mobilization is effectively managed.

European Instrument for Democracy and Human Rights

16. How well do you think the EIDHR has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency; EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

Objective 1 – Support to human rights and HRDs in situations where they are most at risk:

Main focus as per MIP 2014-2017: To concentrate on situations and countries where there is a lack of fundamental freedoms, where human security is most at risk etc. Priorities: To promote respect for relevant international human rights laws, to provide tangible support and means of action to local civil society and to support its work. Next to the Country-Based Support Scheme (CBSS) and global calls, the (M)AAPs have sought to address these priorities in particular through the establishment of a comprehensive HRD Mechanism, and through the Human Rights facility. The facility targets the most difficult situations in which calls aren't possible and aims for a flexible, demand-driven application process. It is difficult to analyze the implementation and success of this facility and small grants to individual HRDs due to sensitivity and confidentiality. CONCORD therefore appreciates if the EC shares its first experiences with applying various new mechanisms and if these lessons are incorporated in the next strategic cycle.

Objective 2 – Support to other EU human rights priorities:

Main focus as per MIP 2014-2017: Protecting human dignity, death penalty, torture and ill treatment, protecting and promoting children's rights, including children in armed conflicts, protecting women's rights, fighting discrimination in all its forms, fighting against impunity; promotion and protection of freedom of religion or belief, promotion of economic, social and cultural rights, promoting respect for international humanitarian law. (M)AAPs address these issues throughout the years, especially with changing priorities being addressed under various lots of global calls. CONCORD recommends the next MIP to pay attention to children and youth, especially girls, with disabilities, community-based child protection services, especially in emergency situations, prevention of sexual exploitation and trafficking of children. The inclusion of boys

and men in deconstructing prejudice and patriarchal culture and youth economic empowerment can play a vital role in addressing this issue.

Objective 3 – Support to democracy:

The MIP describes this objective as a central instrument to fund CS as key actor for democratization. Main focus: Improving participatory and representative democracy, strengthening the overall democratic cycle and processes, developing pro-democracy advocacy, enhancing social dialogue and developing transparency and accountability; including freedom of expression, opinion, assembly and association etc. While the MAAP 2016-2017 includes the support to inclusiveness and pluralism of civil society, and to counter the worrying trend of shrinking space for civil society, CONCORD recommends to further increase efforts around advocacy at national, regional and global level on civil society space, both to prevent but also to react to closure of space for civil society (especially supporting ‘home-grown advocacy’). When doing so, national, regional and global advocacy should be adapted to the contextual frames used locally.

17. Are the current scope and components of the EIDHR (Human Rights, Democracy, Electoral observation) appropriately balanced to meet the beneficiaries' needs? Please explain your view.

Democracy support is currently under-resourced, also long-term support should have a larger role vis-a-vis electoral support (that is done also by regional bodies such as the AU as well as national organizations). The shrinking space of civil society is a consequence of the rise of authoritarianism – and in a larger context it is about shrinking of democratic space.

This can be countered with long-term, non-partisan support to political parties, political actors and multi-party democratic systems. A stronger emphasis should also be placed on the rights of persons with disabilities, freedom of belief and linguistic minorities.

18. Are the current priorities of the instrument appropriate? In particular, do you think that those countries where democracy and human rights are most under threat are appropriately supported? Please provide reasons to support your view.

We would welcome stronger prioritization to combat the shrinking space of civil society.

Situations develop fast, flexibility must be guaranteed so that it will be possible to react quickly when there is an urgent need. Also, the development of early warning systems and preventive support would be useful. Prioritization in the form of democracy pilot countries is a welcomed initiative, piloting for long-term political party support needs to become a regular part of the funding portfolio. The democracy pilot countries, and their respective democracy profiles and action plans give a good basis for improved democracy support.

Non-partisan political party support should be eligible in all EIDHR calls, unlike it is now.

The trend of opening the calls without nationality restrictions (i.e. to applicants outside the EU and DAC recipient countries), as well as for intergovernmental entities – should be reconsidered.

19. If you have any other views on the EIDHR you would like to share, they are welcome here.

We stress the importance of having more flexible criteria for eligibility of local partner organizations, while building in a strong element of capacity development. Especially Human Rights watchdog organizations require support in organizational strengthening to be less vulnerable to the administrative burden laid on them by authorities and will benefit from less complex EU eligibility rules. We also recommend a slightly less strict approach to administrative compliance since local partners who often operate in complex and risky situations, struggle to seize opportunities and meet administrative requirements. We suggest gradual complexity of the application process depending on the size of allocations and mechanisms used.

European Neighbourhood Instrument

20. How well do you think the ENI has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency; EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

In the Review of the European Neighbourhood Policy, the EC recognized the need to focus on democracy, rule of law, human rights and good governance and stated that “The ENP will do more to support civil society” in this sense. These dialogues offer opportunities for civil society to meet and exchange at regional level in a safe and open environment. This aspect is particularly important and welcomed in the current context of shrinking space for civil society at national level in almost all countries from the region.

21. Is the incentive-based approach under the ENI regulation a sound framework for fostering further reforms in partner countries in the neighbourhood? Does it suit the present regional context and did it induce a measurable change in depth or rhythm of structural reforms? Please provide reasons in support of your view.

No input.

22. Does the European Neighbourhood Instrument, as it stands, in association with other EU external action financing instruments, have the capacity to contribute to the stabilisation of the region? Please provide reasons in support of your view.

No input.

23. If you have any other views on the ENI you would like to share, they are welcome here.

No input.

Questions 24-26 on Greenland Decision

No input.

Instrument contributing to Stability and Peace

27. How well do you think the IcSP has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency; EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

A recent amendment to the IcSP would provide budgetary support for Capacity Building for Security and Development (CBSD). The aim of this amendment is to create the conditions to allow EU budgetary support for capacity building programmes in third countries aimed at training and mentoring, the provision of non-lethal equipment and assistance with infrastructure improvements, and help with strengthening the capacity of military actors in order to contribute to the achievement of peaceful and inclusive societies and sustainable development. No additional financial resources would be mobilised to implement the proposal. The initiative would be financed through redeployment within Heading IV ('the EU as an external actor') of the general budget of the Union. The IcSP financial envelope would be increased, over a four-year period (2017-2020), by €100 million to implement the proposal.

CSOs were initially concerned about the amendment, however during a recent consultation the EC confirmed that the new legislation will not permit working with foreign military on defence matters. However, there is a continuing need for the EC to engage CSOs on how this amendment will work in practice.

In a long-term perspective, the new CBSD component may set a precedent for the next MFF which could lead to the IcSP and Heading IV becoming an open house for all kinds of military funding purposes and the related risks for CSO working with the EU being perceived as parties in armed conflicts.

28. Do you think the IcSP is able in its current format to work on crisis response, address global threats to peace and to seize windows of opportunities to build peace? Please give reasons for your views.

To better work on crisis response, address global threats to peace and seize windows of opportunities to build peace, the IcSP needs to be better coordinated with other funding streams and instruments. Currently there is a lack of strategic oversight and complementarity between the EU's thematic and geographic instruments e.g., DCI, ENI, IPAI, EIDHR, EDF and EUTFs. This limits the instrument's effectiveness and can sustainability. There is also a need for other instruments to better mainstream conflict sensitivity, with IcSP playing a role as technical consultant.

29. To what extent have the means provided by the IcSP to-date proven effective in strengthening civil society and international organisations in their capacity to contribute to global peace and security?

To date, the IcSP has been found by INGO partners to be inconsistent in supporting and strengthening civil society's involvement in peace and security processes, and has been too focused on other governmental and institutional actors.

30. Responding to security concerns that affect both third countries and the EU may imply working with authorities whose human rights approach can be challenged. Funding support to them, even after due precautions have been taken, implies certain risks. Can the EU still add value in such circumstances by the ICSP being more proactively engaged in sectors such as counterterrorism, organised crime, and cybersecurity or should the IcSP rather limit its engagement? Please give reasons for your views.

No input.

31. Do you think that the focus of dialogues between the IcSP and other relevant donors has been appropriate to improve the global donor approach to stability and peace? Please give reasons for your views and/or suggestions.

There is a need for improved coordination between the multitude of actors working to address peace and security issues, particularly at national level.

32. If you have any other views on the IcSP you would like to share, they are welcome here.

Over the last years there has been constant pressure on the IcSP to change funding purposes, for example under the Facility for Refugees in Turkey in 2016. From a civil society point of view it would in the current political climate be an achievement to maintain the IcSP as it is without changing the objectives. The role of the CSO community would be to ensure that the IcSP funding remains transparent and to hold EU institutions accountable for what funds will be spent.

Questions 33-45 on Instrument for Nuclear Safety Cooperation, Instrument of Pre-accession Assistance, Partnership Instrument for cooperation with third countries and Common Implementing Regulation

No input.

Additional comments

46. If you have any other views common to several or all instruments you would like to share, they are welcome here.

The majority of EU's funding to civil society is awarded through calls for proposals. We feel that such calls are an open and just mechanism for applying and granting funding. Calls and practices should, however, be developed into more diverse, flexible and inclusive direction.

We have witnessed increased grant sizes in EU calls for proposals, which has led to funding being channelled to smaller number of larger NGOs with previous experience on EU funding and consequently closer ties with the Commission and the Delegations.

It would be important to find a better balance between established partnerships and new opportunities. We feel that EU funding should better reach local civil society, as well as qualified and potential European civil society organizations regardless of whether they have had previous contracts with the Commission. One means to this end would be to further expand the use of ring-fencing in the calls, with separate lots for European and local CSOs, and for different size European CSOs. This would allow for the Commission to fund larger CSO networks with established contacts with the Commission, smaller European CSOs without or with more limited such experience, and local CSOs.

The Commission should also improve forecasting with calls for proposals in all instruments. The EC online system (PROSPECT and the website for calls for proposals) already allows forecast information on calls to be opened in the future, but this function is rarely if ever used. Forecasts should also be published on the Delegation websites. This would significantly improve the quality of concept notes and thus also support the Commission's work in evaluation of the proposals. At the moment, in practice CSOs are not treated equally with larger networks having better access to unofficial information about future calls.

We would welcome a practice in which in kind contributions would be considered as co-financing to help smaller and largely voluntary based organizations to have the opportunity to apply for funding, and for the Commission to fund them whenever they would otherwise appear competitive in the calls.

In our view open calls for proposals should be avoided, and used only when clearly justified. The one-stage application procedure is very heavy for the applicants and might discourage potentially very good applicants and applications.

The Commission should look for ways to improve flexibility in the instrument selection, in order to allow for both fast reactions in a changing environment, and for longer-term flexible support. This would allow long-term support to partners while preventing conflicts and crises. Longer-term support also allow early reaction to potentially escalating situations. Consultations and dialogue with civil society and other stakeholders should be further improved. Delegation websites should publish information about upcoming consultations and dialogues.

Transparency and accountability should be improved also in other programmes and funding than in those targeting civil society. We are especially concerned about new trust funds the new European External Investment Plan, in which transparency, accountability, monitoring and partner country ownership especially important.

Looking forward to arrangements for the External Financing Instruments post 2020

The External Financing Instruments which support the EU's external actions will expire at the end of 2020. The questions below are about possible, future options for EU external financing instruments. Respondents should not feel bound by current arrangements of the instruments and are encouraged to reflect openly and

creatively. Where applicable, contributors are encouraged to illustrate their answers with experiences from other organisations/donors.

Structure and content

47. Considering the evolving EU policy framework (such as the EU Global Strategy for the European Union's Foreign and Security Policy and the 2030 Agenda and its Sustainable Development Goals) and key global challenges (such as sustainable growth and jobs creation, migration, security, peace-building, crisis response, environment and climate change), what kind of External Financing Instruments are needed after 2020 in terms of structure and content, bearing in mind the possible future of the European Development Fund? If relevant, justify the level of financial assistance needed compared to the current instruments.

In general, we emphasize the importance of funding instruments being structured and regulated in a way which respects and promotes broad democratic ownership of partner countries and the other development effectiveness principles. In terms of content, we stress the importance of not letting the increased EU focus on migration, security and crisis response affect negatively the level of investments in other key global challenges. We would especially like to see increased EU investment in people-centered development including gender equality, democratic governance and human rights, climate resilience and environmental rights, social security and wellbeing.

In addition to facilitating discussions within its membership in the coming months, we would recommend the EC to facilitate similar multi-stakeholder discussions including also stakeholders from partner countries. This is advisable considering the scope and importance of this question, not least in order to ensure synergies and substantial contributions towards achieving the SDGs in the years leading up to 2030.

Here are some initial reflections on the structure and content of the external financing instruments:

- The impact on differentiation and its consequences for different stakeholders in-country, including civil society, should be evaluated. It is of vital importance that the thematic instruments and programmes are upheld and used strategically in Middle Income Countries.
- The EU needs an effective and impactful methodology for mainstreaming the issues which have benchmarks for a certain percentage of total funds, such as climate change and gender equality. Mainstreaming should always mean concrete and substantial efforts, reflected in sufficient resource allocation, commitment to transformative change, incorporation at all levels of the results hierarchy and in indicators and follow-up, across all instruments.
- Continued simplification and transparency in the criteria for allocation of funds and in the programming. And rather than increased flexibility as a goal in itself, the focus should be on good planning and budgeting practices that ensures no need for overly large reallocation of funds (such as from the EDF to the EU trust fund for Africa).
- The support to strengthening of civil society is a key programme where the EU plays a strong and significant role among international donors. This role can be further strengthened, and we

recommend a continued increase of the programme supporting CSOs, in the light of shrinking space and the need for consolidating democratic governance, in the spirit of Agenda 2030 inclusive partnerships and “leave no one behind”, and to be able to support a wider range of civil society organisations including local and grassroots organisations.

- The EIDHR is an instrument well fit for purpose which plays a vital role in many countries.
- Peace building and conflict prevention needs more focus, perhaps even consider creating a separate instrument for peace building and conflict prevention.
- The current GPGC thematic programme within the DCI is not structured in a way which benefits synergies between instruments and programmes, and should be restructured completely. While the thematic areas covered are highly relevant, the structure, name, and strategy of the programme are not adequate. When restructuring this part of the thematic programming, the EU should do it with the SDGs and Agenda 2030 principles in mind, and take the opportunity to integrate support for pilot actions to implement Agenda 2030, which can then be expanded to other instruments.

48. Do you see room for EU external assistance initiatives beyond the scope of the existing instruments, and if so in what fields?

Please refer to answer in question 47.

Complementarity, coherence and leverage

49. How can the EU increase the coherence between its external financing instruments and programmes supporting internal policies, notably those with a strong external dimension (e.g. migration, research, higher education)?

The important thing is that coherence between internal and external policies is done with a strong focus on Policy Coherence for Sustainable Development (PCSD), so that all policies strive to be coherent with sustainable development in its four dimensions (social, environmental, economic and governance) and respecting human rights and planetary boundaries.

The EU has a legal obligation to take its development cooperation objectives into account in all policies which are likely to affect developing countries. This means that EU's policies on migration, research and higher education should respect the objectives of poverty reduction, human rights and sustainable development. Instead this principle seems to be often misinterpreted as development cooperation supporting EU's internal policies. EU development funds should always maintain a focus on poverty reduction and social justice, and not be made to serve European economic, security or migration policy goals.

Migration is an important area of development work. The right to asylum, safe migration (also for women and girls), low-cost remittances and other positive development effects of migration, all of these are

important development and human rights issues. But “addressing the root causes of migration” is putting the political agenda of EU member states to block migration to Europe ahead of the development goals of EU aid, and we challenge the use of this terminology as well as the flawed premise that it is the root causes of migration rather than the root causes of poverty, conflict and oppression that need addressing.

50. How to improve the complementarity between the EU's external assistance and the external assistance of its Member States, as well as the right articulation with other actors' cooperation (e.g. third countries, international organisations, private sector, development banks)?

Joint programming at country level is potentially beneficial for the quality of aid, provided that it complies with the development effectiveness principles of local ownership, inclusive partnerships, transparency and accountability and focus on results. We recommend an in-depth evaluation of the experiences of joint programming so far, especially on how partner countries perceive it. Joint programming should be combined with a joint strategic approach of EU and member states of supporting CSOs as independent development actors in their own right, through continuing to develop the EU country roadmaps as a strategic tool for support to civil society.

Overall, an active EU commitment to the development effectiveness agenda is important, and all articulation with the cooperation of other actors should be guided by a solid understanding of the roles of each actor and the link to the development effects for people living in poverty and oppression.

51. To what extent and how best should the EU leverage additional funds (public and private) through innovative mechanisms, like blending, guarantees and trust funds?

Leveraging additional public and private funds is a prerequisite to fulfilling the commitments in the Addis Ababa Action Agenda (AAAA). The important aspects when using financial mechanisms such as blending and guarantees is to safeguard that funds are concessional and truly additional, meaning that investments wouldn't have been made without the development funding. Also important is to make sure that all development actors are held to the same high standards and development effectiveness principles. Private funding comes with private priorities, and it must be avoided when not in line with (democratically endorsed) national development plans and EU development cooperation principles. For example the European Court of Auditors were critical of the effectiveness of blending in its 2014 review of blending grants and financial institution loans, and these concerns should be extensively addressed before investing more in blending facilities.

Trust funds can be an effective way of aligning donor requirements and reducing administration. An important aspect is to ensure that there is strong local leadership and ownership of the trust fund, and that the same standards of transparency and stakeholder dialogue apply as in other development cooperation. When it comes to transparency and dialogue, so far information about trust funds has been difficult to obtain, with different answers depending on what unit or EU delegation you ask, and dialogue with civil society has neither been systematic nor consistent. A weakness of EU trust funds so far has also been that decision making has been centered in the group of donors, with less influence for the partner countries, compared to country programmes.

Thematically, the most controversial trust fund to date has been the Emergency Trust Fund for Africa, with its focus on “addressing the root causes of migration”. Against the background of the political discourse around “migration management” and the key points raised under this pillar of the Africa Emergency Trust Fund, CSOs have questioned the development focus of actions aimed at: “improving migration management, including containing and preventing irregular migration, effective return and readmission, international protection and asylum, legal migration and mobility, and enhancing synergies between migration and development (copy from website DG DEVCO)”. It is important to note that increasingly this trust fund has focused more on funding returns, border control, security and training of border guards. We recommend that the EUTF focus on development projects (based on needs, aimed at eradicating poverty, and aligned with the SDGs) and protection.

From a broader perspective CSOs have contributed to and will continue to be a part of the actions in trust funds, but are more suited to contribute to programming that is classified under thematic areas that belong to their natural stronghold for long-term partnership building and outreach on the ground to communities and final beneficiaries. These areas of cooperation are for example: the creation of economic opportunities, resilience, food security, including elements under stability and governance, for example, promotion of conflict prevention and addressing human rights abuses.

The trust funds mechanism should be used when desirable from the perspective of the recipient country, and if development effectiveness principles are fully respected. Ideally, the default cooperation mechanism should be long-term development cooperation within the framework of regular country and thematic programming, with a broad-based democratic local ownership.

52. Should the instruments be geographically or thematically structured, or is a mix of both more convenient? What delineation should there be between the corresponding instruments/programmes?

The combination of national and regional/cross-border geographic programming with thematic programming (both global, regional and national) is important to create the instruments needed to support the whole range of processes and actors necessary to combat poverty, promote human rights and long-term sustainable development; social, economic and environmental.

Flexibility and simplification

53. To what extent should the External Financing Instruments ensure more flexibility (currently limited, for example, through long-term, ring-fenced envelopes), in order to better respond to evolving challenges – while preserving predictability and long-term engagement with partner countries (where the latter is needed)?

The majority of EU's funding to civil society is awarded through calls for proposals. We feel that such calls are an open and just mechanism for applying and granting funding. Calls and practices should, however, be developed into more diverse, flexible and inclusive direction.

We have witnessed increased grant sizes in EU calls for proposals, which has led to funding being channelled to smaller number of larger NGOs with previous experience on EU funding and consequently closer ties with the Commission and the Delegations.

It would be important to find a better balance between established partnerships and new opportunities. We feel that EU funding should better reach local civil society, as well as qualified and potential European civil society organizations regardless of whether they have had previous contracts with the Commission. One means to this end would be to further expand the use of ring-fencing in the calls, with separate lots for European and local CSOs, and for different size European CSOs. This would allow for the Commission to fund larger CSO networks with established contacts with the Commission, smaller European CSOs without or with more limited such experience, and local CSOs.

The Commission should also improve forecasting with calls for proposals in all instruments. The EC online system (PROSPECT and the website for calls for proposals) already allows forecast information on calls to be opened in the future, but this function is rarely if ever used. Forecasts should also be published on the Delegation websites. This would significantly improve the quality of concept notes and thus also support the Commission's work in evaluation of the proposals. At the moment, in practice CSOs are not treated equally with larger networks having better access to unofficial information about future calls.

We would welcome a practice in which in kind contributions would be considered as co-financing to help smaller and largely voluntary based organizations to have the opportunity to apply for funding, and for the Commission to fund them whenever they would otherwise appear competitive in the calls.

In our view open calls for proposals should be avoided, and used only when clearly justified. The one-stage application procedure is very heavy for the applicants and might discourage potentially very good applicants and applications.

The Commission should look for ways to improve flexibility in the instrument selection, in order to allow for both fast reactions in a changing environment, and for longer-term flexible support. This would allow long-term support to partners while preventing conflicts and crises. Longer-term support also allow early reaction to potentially escalating situations.

Consultations and dialogue with civil society and other stakeholders should be further improved. Delegation websites should publish information about upcoming consultations and dialogues.

54 Should EU external assistance focus more on approaches based on incentives?

No input.

55. Should the design and delivery of EU external assistance be further simplified, and if so, how could this be achieved?

Yes. Reducing the quantity of rules and documents is generally a positive step. For the majority CSOs, the important reference is the PRAG, so the principle of less rules and more clarity should be applied also there. A close and ongoing dialogue between the EU institutions and civil society on the PRAG is important and

appreciated. Regular training of all staff programming and managing EC funds (e.g. in EU delegations) in application of these regulations and rules should be ensured.

Simplification is generally positive, as long as convergence of rules does not muddle the lines between the purposes of the different ways of providing funding. Grants have a different purpose and a different entry point than procurements or financial instruments do. Grants have a sense of ownership that is missing from the other instruments. There is a distinct risk when the rules are made more easily interchangeable that the perception of EU staff of the different instruments and the different stakeholders could be perceived as more interchangeable, too. Any changes made to make rules more convergent should be analysed carefully to ensure that they do not affect negatively the right of initiative and ownership of grant beneficiaries.

The EC proposal is promoting the use of simplified forms of grants, either through simplified cost options (SCO) such as lump sums, unit costs, flat rate financing and apportionment, or single lump sums. CONCORD experience is that reporting against SCO is not necessarily perceived as being less burdensome than reporting on actual incurred costs because each Contracting Authority (CA) reserves the right to request supporting evidence of expenditure.

Moreover, the threshold for using SCO within a grant has been until now relatively low, making the option not worth the effort. Simplifying the authorisation procedure of SCO within the CA, giving such responsibility to the authorising officer, may not necessarily mean simplification for a beneficiary whose internal systems are based on actual costs and for which full cost recovery remains the priority.

In this respect, we would like to make the following recommendations to the EC:

- Ensure that each Contracting Authority leaves the choice to grant beneficiaries whether to apply SCO or not and, when applicable, that those Contracting Authorities apply the same level of controls, as agreed in advance, as well as a consistent approach in assessing the beneficiaries' methods for determining SCO.
- Prevent inconsistent interpretations on the appropriateness of using lump-sums, unit costs flat rate financing and avoid to automatically link the use of SCO with a Payment by Results approach in the context of development projects, since no one size fits all.

On the issue of simplification we would also like to emphasize that simplified cost options are not the only and not necessarily the most effective way of simplifying rules and procedures. There are many other requirements that could be changed which would mean a significantly eased burden for both grant beneficiaries and the EU:

- Simplification of the grant application and selection procedures, uniformity of approach and transparency on the process would relieve substantial administrative burden from CSOs – especially smaller ones.
- Simplification of the rules on VAT, nationality and origin, supporting documents, etc. are other examples of simplifications which we recommend to explore.