

# CONCORD

European Confederation of NGOs working on  
sustainable development and international cooperation

# Rounding out the EU's Global Gateway: **360 DEGREES FOR HUMAN DEVELOPMENT**

Policy Brief



May 2026

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*This report was supported by the Robert Bosch Stiftung.*

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# EXECUTIVE SUMMARY

This policy brief examines the European Union's emerging 360-degree approach within the Global Gateway strategy. It assesses whether the 360-degree approach contributes to aligning investment-led international cooperation with human development objectives, including inequality reduction and the achievement of the United Nations Sustainable Development Goals (SDGs).

Global Gateway reflects a shift in EU external action towards large-scale infrastructure investment, private sector mobilisation and increased use of financial instruments such as guarantees and blended finance. While this approach aims to close the financing gaps left unfilled by traditional aid, it raises concerns that sustainable development priorities — particularly those related to human development — may be subordinated to geopolitical and economic interests.

The 360-degree approach has been introduced as a response to these concerns. It seeks to ensure that infrastructure investments are embedded within a wider enabling environment, incorporating elements such as regulatory reform, governance, skills development, gender equality, environmental and social standards and stakeholder consultation. If well implemented, this integrated model could enhance the developmental impact of investments and improve their contribution to SDGs related to poverty, health, education and equality. However, the evidence highlights a significant gap between ambition and practice. The analysis shows that grant-based Official Development Assistance (ODA) remains far more aligned with human development objectives than investment-based instruments.

At the conceptual level, the 360-degree approach lacks clarity. It is not consistently defined as either a new operational framework or a reframing of existing EU tools and commitments. Most of its components pre-date Global Gateway and should already be embedded across EU practice. The absence of explicit and clear links between the EU's previous commitments and the framework

creates ambiguity, risks selective implementation and limits accountability.

At the operational level, the approach remains unevenly applied and insufficiently institutionalised. References to it are scarce in the EU Delegations, and there is limited evidence of systematic integration within the portfolio of the European Fund for Sustainable Development Plus (EFSD+). Only a minority of investment operations explicitly incorporate human development objectives or enabling environment components. Further, the lack of available data and limited transparency make it difficult to assess how the approach influences project design, financing decisions or sustainable development outcomes.

**The 360-degree approach shows potential to reconcile investment-led cooperation with human development objectives but remains largely theoretical.**

Case study analysis reinforces these findings. While selected projects demonstrate elements of integrated design, implementation is often partial, inconsistent or largely narrative. Components such as regulatory reform, skills development and technology transfer are relatively visible, particularly where they support investment viability. In contrast, dimensions such as gender equality or employment are weakly operationalised or absent. This uneven integration suggests the approach is shaped more by investment logic than by a systematic commitment to human development and inequality reduction.

Overall, the 360-degree approach currently functions more as a strategic narrative than a fully operational methodology. It shows potential to reconcile investment-led cooperation with human development objectives but remains largely theoretical. Without clearer definitions, stronger guidance, effective uptake and improved transparency, there is a risk that it will not significantly alter development finance patterns or

ensure that Global Gateway investments reach the most marginalised.

To address these shortcomings, the EU should anchor the 360-degree approach firmly in its legal obligations and policy commitments, ensuring consistent implementation across all projects. Our brief recommends improving traceability and public reporting, strengthening operational guidance and systematically integrating tools such as inequality and gender markers. Crucially, investment-based approaches can complement, but not replace grant-based aid: dedicated funding for human development remains essential to achieving the EU's core sustainable development objectives.

In conclusion, while the 360-degree approach offers a promising framework to enhance the developmental impact of EU investments, its effectiveness will depend on moving from conceptual ambition to concrete, measurable and accountable implementation.



# THE EU'S 360-DEGREE APPROACH: WHAT IS THE ISSUE?

As development finance has become increasingly intertwined with strategic diplomacy, economic security and the politics of global influence, infrastructure investment has re-emerged as a central arena for geopolitical competition, most notably in response to China's growing presence as a leading financier of large-scale connectivity projects across the Global South. Against this backdrop, the European Union's Global Gateway initiative is paradigmatic of this shift in the EU's approach to development cooperation.

**How does the combination of hard infrastructure and enabling environment elements embedded in the 360-degree narrative actually influence investment choices, design processes and outcomes to favour human development, reach marginalised populations and reduce inequalities?**

As debates have intensified around the new focus on investment, CONCORD and other civil society organisations have raised concerns that human development objectives — especially poverty eradication and inequality reduction — are being overshadowed by geopolitical and economic considerations. It is in this context that the **360-degree approach** began to take shape for the implementation of the EU's Global Gateway.

The 360-degree concept appears to theoretically reframe EU actions as multidimensional packages where investments in **hard infrastructure** are systematically accompanied by **enabling environment components**: policy dialogue, regulatory reform, skills and education, youth employment measures, gender equality, norms and standards, including Environmental, Social and Governance (ESG) safeguards, impact assessments, consultation with civil society, and broader enabling-environment reforms.

In light of these recent developments a fundamental question arises: to what extent does the EU's 360-degree approach enable Global Gateway investments to contribute effectively to human development - especially Sustainable Development Goals (SDG) 1 End Poverty; SDG 2 Zero Hunger; SDG 3 Health and Well-being for All; and SDG 4 Quality Education for All - and to reduce inequalities, including SDG 5 Gender Equality and SDG 10.

The goal of this Policy Brief is to examine how the 360-degree approach operates within Global Gateway and the main financial instrument that supports it: the European Fund for Sustainable Development Plus (EFSD+). It also explores to what extent the approach serves as a guiding tool to enhance developmental coherence within investment-led cooperation.

The central question we aim to answer is: How does the combination of hard infrastructure and enabling environment elements embedded in the 360-degree narrative actually influence investment choices, design processes and outcomes to favour human development, reach marginalised populations and reduce inequalities?



# THE CONTEXT: HUMAN DEVELOPMENT IN TIMES OF BANKABILITY

With the launch of the Global Gateway strategy in 2021,<sup>1</sup> the EU signalled a decisive shift prioritising infrastructure-led investments and private sector mobilisation through financial instruments such as guarantees and blended finance, which are meant to **mobilise additional resources beyond Official Development Assistance (ODA)**. The approach is aligned with the Addis Ababa Action Agenda,<sup>2</sup> further reaffirmed in the Sevilla Commitment,<sup>3</sup> which stated that ODA and grants-based schemes alone cannot meet global development financing needs.

According to the Joint Communication that announced the strategy — **anchored in major infrastructure investment** ranging from energy grids, renewable generation and transport corridors to fibre-optic networks, digital systems for education, healthcare digitalisation, vaccine production capacity, water and sanitation, and research and innovation ecosystems — investments require a strong enabling environment, supported by policy dialogue, regulatory alignment, and long-term capacity building.

Yet, unlike grant-based cooperation, **investments require bankable projects**, meaning operations capable of generating financial returns that justify loans or risk-sharing guarantees from the EFSD+ and European development finance institutions (DFIs). **Such an approach risks marginalising projects in sectors and countries that are central to the EU development policy goal of poverty eradication such as Least Developed Countries**

**(LDCs), Lower and Middle Income Countries (LMICs)**. This emphasis on bankability is visible in the EFSD+ focus on digital connectivity, renewable energy and sustainable transport, where investment returns are clearer.

Health and education are also mentioned in the European Commission (EC) investment plans,<sup>4</sup> but studies note that investments in **social sectors remain comparatively fewer**.<sup>5</sup> Moreover, these fewer projects tend to focus on a narrow scope of interventions like vaccine production or digital education platforms, while grant-based ODA has the capacity to provide policy-wide and system-wide structural reinforcement and solutions in sectors like health, education and social protection, where aid has demonstrated impact in the last decades.<sup>6</sup>

It is not easy to steer investments towards the SDGs that are most closely linked with human development and the primary goal of EU development policy, i.e. poverty eradication. The EC argues that this can be done by embedding the EFSD+ into the wider NDICI–Global Europe programming process, and adopting managerial solutions similar to those applied to traditional aid, such as **Result Management Frameworks or inequality, disability and gender markers**. However, previous analyses of the Global Gateway indicate that its flagship projects lack developmental depth<sup>7</sup> and are driven more by EU competitiveness and strategic autonomy than by development effectiveness<sup>8</sup> or are defined in such broad terms (e.g. MSME<sup>9</sup> support) that do

1 [2021 Joint Communication on Global Gateway.](#)

2 <https://www.un.org/esa/ffd/publications/aaaa-outcome.html>.

3 <https://news.un.org/en/story/2025/07/1165276>.

4 EC, “Global Gateway: Health,” European Commission, 2025; EC, “Global Gateway: Education and Research,” European Commission, 2025.

5 Mikaela Gavas and Laura Granito, “What the Global Gateway Flagship Projects Tell Us about the EU’s Priorities,” Center For Global Development, 2024.

6 Aitor Pérez et al., *The EU Aid Strategy: A Gateway to Human Development?*, DEVE (Publications Office, 2025).

7 San Bilal and Chloe Teevan, *Global Gateway: Where Now and Where to Next?*, 2024.

8 Gavas and Granito, “What the Global Gateway Flagship Projects Tell Us about the EU’s Priorities.”

9 Micro, small and medium-sized enterprises

not allow for strategically targeting poverty and inequalities.<sup>10</sup>

**This trend in EU aid reflects a broader process of financialisation of the development sector<sup>11</sup> which prioritises donor countries’ corporate interests, rather than development priorities, as is the case with Global Gateway.<sup>12</sup>** On this note, we found in a previous study that, while Global Gateway infrastructure programmes can reduce inequalities, its projects are not yet systematically reaching the poorest 40% in the countries where they take place, and without explicit inequality-reduction objectives, they may reinforce existing socio-economic disparities rather than reduce them.<sup>13</sup>

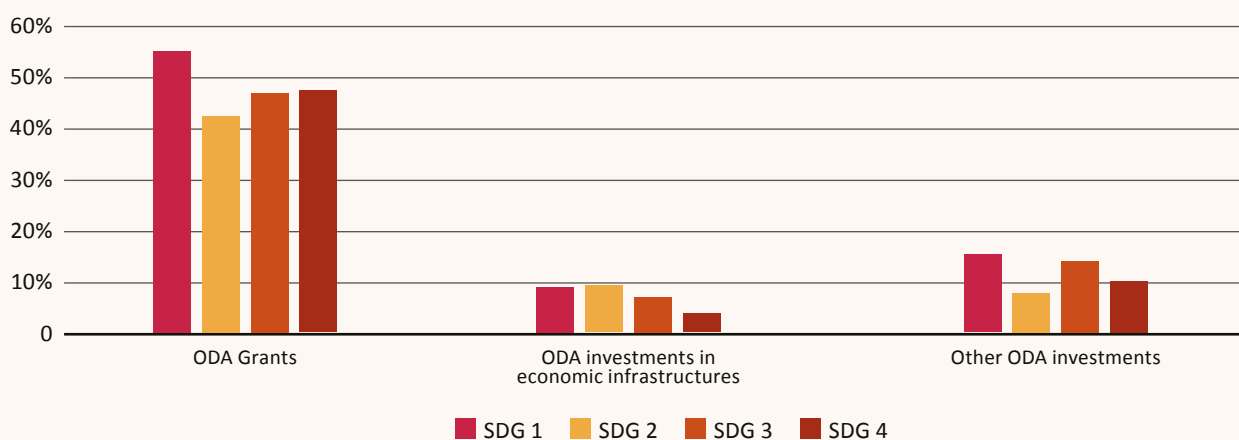
## What the data says: SDGs in grants versus blending and guarantees

**Grant-based ODA is substantially more aligned with human development objectives than loans and capital investments.<sup>14</sup>**

This is our conclusion, based on 2023 OECD DAC data, **across all donors and sectors, when comparing ODA grants with ODA investments** and their markers for SDGs 1–4, gender, and democratic and inclusive governance (DIG).

**Grants** score markedly higher average values for SDG markers related to poverty reduction, food security, health and education, with typical alignment in the range of 43–55 %, while **investment operations** score below 10% on the same indicators (see Figure 1).

**Figure 1: ODA grants versus ODA investments (SDG alignment) % of interventions marked with SDGs 1 to 4 in OECD databases according to donors’ self-assessment**



10 Aitor Pérez et al., *The Implementation of EFSD+ Operations from an Inclusive Perspective*, Study PE 702.595, Think Tank Series (European Parliament, 2023).

11 Langan, M. and Murtagh, C. (2023) ‘EU Aid and the Financialization of Development’, in Langan, M. (ed.) *The Financialization of Development: Foreign Aid and the New Paradigm*. London: Routledge, pp. 89–108.

12 Eurodad and Counter Balance (2022) *The Emperor’s New Clothes: What’s New About the EU’s Global Gateway?*; Eurodad (2023) *Global Gateway Forum: A Closed-Door Gathering Which Fundamentally Changes the EU’s Development Landscape*; Eurodad, Counter Balance and Oxfam (2024) *Who Profits from the Global Gateway? The EU’s New Strategy for Development Cooperation*; Counterbalance and Eurodad 2024 *Global Gateway risks diverting EU aid budget to big business*; CONCORD and Eurodad (2025) *The EU’s Global Gateway: A Civil Society Perspective*.

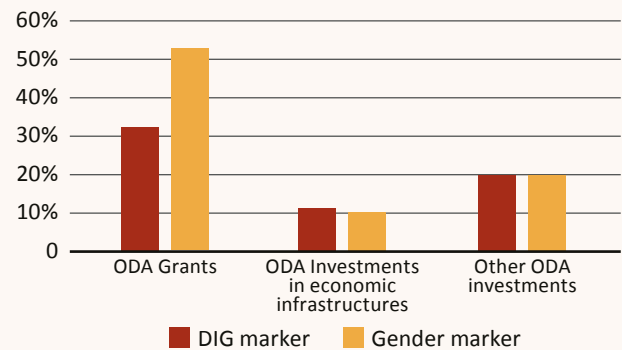
13 CONCORD (2024) *A Gateway to Equality? Insights from El Salvador and Lesotho on tackling inequalities in the European Union’s Global Gateway programmes*.

14 To provide a broader context for the discussions around the Global Gateway strategy and its connection with human development objectives and tackling inequalities, we carried out an analysis of the available 2023 CRS Data of the OECD DAC, considering policy markers that are relevant to human development, including the OECD Gender marker, the OECD DIG marker; SDG 1. End Poverty; SDG 2. Zero Hunger; SDG 3. Health and Well-being for All; and SDG 4. Quality Education for All.

Interestingly, the same pattern is present in the gender and DIG markers: grants score systematically higher, including a gender marker average of 53% and a DIG score of 33%, whereas ODA investments score 14% and 15% (Annex III<sup>15</sup> and Figure 2).

This analysis of the available ODA data suggests that investments, which are so central to the Global Gateway strategy, are less likely to be oriented towards human development and inclusion than grants. This evidence supports our view that the need to ensure the integration of the EU's goals and values around human development and inclusion, was one of the drivers behind the emergence of the 360-degree approach.

**Figure 2. ODA grants versus ODA investments (inclusive markers) % of interventions marked with inclusive markers in OECD databases according to donors' self-assessment**



*Note: ODA investments include ODA flows reported by donors as loans or capital investments. Economic infrastructures refers to the OECD DAC macro sector II “economic infrastructures and services”, which captures physical investments in transport and storage, communications and energy, as well as investments in the banking and private sectors.*

*Source: Creditor Reporting System (CRS) 2023 Data, OECD DAC.*

The need to ensure the integration of the EU's goals and values around human development and inclusion, was one of the drivers behind the emergence of the 360-degree approach.



<sup>15</sup> All three annexes of this Policy Brief are available [here](#).

# THE 360-DEGREE APPROACH: FROM THEORY...

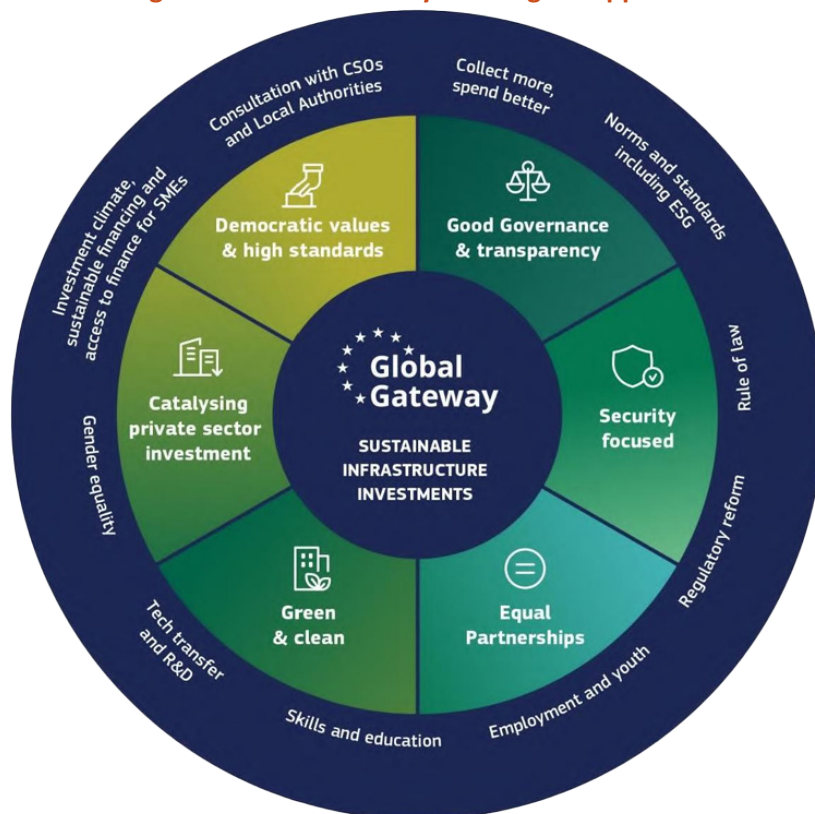
The concept of a “360-degree approach” emerged as a narrative in the debate on grants versus investments and the evolution of EU financial practice. It is intended to reconcile the infrastructure focus of Global Gateway with the EU’s overarching policy commitments towards sustainable development. According to the Director-General of International Partnerships (DG INTPA), the Global Gateway is about more than just supporting hard infrastructure; promoting investments with a 360-degree approach “is what sets Global Gateway apart and exemplifies the EU comparative advantage”.<sup>16</sup>

According to the EC presentation of this approach,<sup>17</sup> it requires a ‘whole-of-Delegation’

and Team Europe approach combining a ‘mix of modalities’ and tools already available at the EC, such as the Result Management Framework (RMF+), the Greening Toolbox, Conflict Analysis Screening, Human Rights-Based Approach (HRBA) Toolbox, CSO Roadmaps, Country Level Implementation Plans (CLIPs) in the framework of the Gender Action Plan (GAP) III, environmental impact assessments, etc.

The approach is visually represented as two concentric circles surrounding sustainable infrastructure investments. The inner circle contains the **six Global Gateway principles** (green and clean, equal partnerships, democratic values and high standards, good governance and

Figure 3. Global Gateway 360-degree Approach



Source: (EC, 2025a).

16 2024 Note (of INTPA Director-General) for the attention of INTPA Directors, INTPA Heads of Unit, Heads of EU Delegations, Heads of Cooperation and Heads of Finance and Contracts in EU Delegations.

17 EC, [Global Gateway 360-Degree Approach Presentation](#), Meeting document (Working Party of Foreign Relations Counsellors (RELEX) - Horizontal Questions - EU Council, 2025)

transparency, security focused and catalysing the private sector), which have been part of the initiative since its inception. The outer circle presents a series of **enabling environment components** that should accompany investments to enable effective delivery:

1. **Collect more, spend better**
2. **Norms and standards including ESG**
3. **Rule of Law**
4. **Regulatory reform**
5. **Employment and youth**
6. **Skills and education**
7. **Technology transfer and R&D**
8. **Gender equality**
9. **Investment climate, sustainable financing and access to finance for small and medium-sized enterprises (SMEs)**
10. **Consultation with CSOs and local authorities**

The concept promotes holistic integration as being central to theory and practice. The SDGs themselves represent a global consensus around a multidimensional framework, encompassing 17 goals and 169 targets that span economic, social, environmental and institutional domains. The same concept is often embedded under different terms such as “integrated,” “cross-sectoral,” or “whole-of-government” approaches.

## A promising but unclear link with human development and equality

In principle, **the incorporation of enabling elements around a hard infrastructure investment can facilitate the identification of risks and opportunities for the most marginalised, as well as the mitigation of the risks.** For example, integrating skills development alongside an infrastructure intervention directly supports SDG 4 (Quality Education); including measures on youth and employment can improve

income opportunities and thus contribute to poverty reduction. Ensuring consultations with civil society organisations and local communities is essential to reach the most marginalised groups and to shape projects that take inequalities and local realities into account.

This potential link between infrastructure development and human development is also emphasised by the European Commissioner for International Partnerships Jozef Síkela: “This initiative embodies the 360-degree approach of our Global Gateway strategy, showing that our projects are about much more than just infrastructure. We place the people for whom we are developing these projects at the centre of the design process. By integrating social inclusion across our initiatives, we ensure that our investments benefit women, children, young people, and the most vulnerable in Latin America and the Caribbean – maximising our impact.”<sup>18</sup>

Yet, there is still widespread uncertainty around what the 360-degree approach entails in practice.

A recent OECD peer review of the EU indicated that while the Global Gateway has potential to reduce poverty and inequality, the 360-degree approach, which it characterises as the EU’s primary added value for making infrastructure projects inclusive and sustainable, “would benefit from greater clarity and guidance”.<sup>19</sup> The OECD notes, for example, that interpretations of the approach vary significantly, ranging from the minimal “do no significant harm” approach to a more integrated support for the enabling environment for investments and reducing inequalities.

In addition to the three key documents outlined above, in March 2026 INTPA launched an online training on the 360-degree Global Gateway approach.<sup>20</sup> The training provides an overview of the six Global Gateway principles and ten enabling

18 EC, “Global Gateway: EU Launches New Programme to Foster Inclusive Societies in Latin America and the Caribbean - International Partnerships,” 2025.

19 OECD, *OECD Development Co-operation Peer Reviews: European Union 2025*, OECD Development Co-Operation Peer Reviews (OECD Publishing, 2025), p. 51.

20 *E-learning course on the Global Gateway 360-degree approach*, INTPA Academy, Accessed March 24, 2026 (EU login needed). This training is in addition to DG INTPA’s 2025 report *Reducing Inequality through Global Gateway: A Strategic Role for the Private Sector* which provides an initial sense of how the 360-degree approach could work for non-EU investments. Published on Capacity4dev, this document outlines the defining features of the approach and provides 15 good practices of private sector mobilisation in strategic sectors such as digital, energy, transport, health, and education. All 15 case studies

environment components as well as examples of projects with significant inclusion of 360-degree elements.<sup>21</sup> Whereas it offers a compelling narrative showing how infrastructure, people, governance and policy interact, it remains vague in practice, especially around what counts as “strong” 360-degree elements and how various stakeholders are to apply or assess the approach concretely and systematically.

**Without clarity on the policy and legal basis underpinning the enabling environment components of the 360-degree approach, there is a risk of leaving out crucial EU commitments and/or failing to explain how they interact one with another.**

## A new approach or a rebranding?

As the online training mentions, **many elements of the 360-degree approach pre-date the Global Gateway strategy.**<sup>22</sup> This is consistent with the European Commission presentation to the Council of the EU’s Working Party of Foreign Relations Counsellors (RELEX), which placed the 360-degree approach within preexisting tools and methodologies, including the RMF+, GAP III, CSO Roadmaps, and the broader ‘whole-of-Delegation’ and Team Europe ways of working.<sup>23</sup> **It is therefore unclear whether senior EC officials are introducing a new approach to EU cooperation or simply describing how the EU has been operating since the setup of the EFSD+ and the adoption of Global Gateway.**

The EC documents mentioned above do not present the 360-degree approach as a new strategy to be progressively rolled out, but rather

as a description of current practice—suggesting that it is intended to give coherence to existing ways of working rather than signal a future operational change.

For this reason, the European Commission should explicitly **state the pre-existing commitments and obligations** in EU law and policy instruments that are supposed to be embedded in the 360-degree approach. As the EU was already bound to deliver on these principles, irrespective of the introduction of the 360-degree approach, **the challenge is not adoption, but rather effective implementation of measures to achieve a number of the Union’s core objectives.** Without clarity on the policy and legal basis underpinning the enabling environment components of the 360-degree approach, there is a risk of leaving out crucial EU commitments and/or failing to explain how they interact one with another.

**Human Rights, for instance, do not feature explicitly as one of the Global Gateway’s core principles, nor as a 360-degree enabling component,** even though they are embedded as the cornerstones of the NDICI-GE Regulation. As a consequence, the obligation to enforce the rights of persons with disabilities, for instance, is nowhere made explicit, in spite of the EU’s legal obligations as a State Party to the United Nations Convention on the Rights of Persons with Disabilities (CRPD).<sup>24</sup> This omission is significant, given the insufficient integration of disability inclusion across the EU’s international cooperation programmes.<sup>25</sup>

Other INTPA commitments that have been politically significant, such as tackling inequalities and reaching the bottom 40% in the wealth, income and consumption distributions -

21 Although the methodology for case selection was conducted before the publication of this Policy Brief, several of the eight cases selected for this paper were included as examples in the training.

22 [E-learning course on the Global Gateway 360-degree approach](#), INTPA Academy, Accessed March 24, 2026 (EU login needed)

23 EC, [Global Gateway 360-Degree Approach Presentation](#), Meeting document (Working Party of Foreign Relations Counsellors (RELEX) - Horizontal Questions - EU Council, 2025)

24 In its 2025 [Concluding observations on the combined second and third periodic reports of the European Union](#), the CRPD committee asked the EU to “ensure that all European Union funding, policies and programmes related to international cooperation and sustainable development, including all Team Europe and Global Gateway initiatives, adhere to the principles of accessibility and participation of persons with disabilities”.

25 European Disability Forum, 12 December 2025: [New report finds serious gaps in Disability-Inclusive EU aid](#).

materialised in the **Inequality Marker** -, would benefit from being explicitly linked with the 360-degree implementation, in line with the call from the Council of the EU for “the broadest application of the Inequality Marker, including in Team Europe Initiatives and with regard to the Global Gateway”.<sup>26</sup>

At the same time, whereas INTPA states that not all 360-degree components of the diagram need to be present in all programmes,<sup>27</sup> **it does not distinguish between those that must be considered - because they are legal commitments, for example - and those that may be chosen** depending on the context or the type of programme.

The absence of explicit, structured and exhaustive reference to the EU legal and policy commitments underpinning the approach, as well as the lack of guidance on the inclusion criteria of the components that do appear in the diagram, is a serious omission which may compromise its consistent and meaningful use.



<sup>26</sup> Council conclusions on a social, green and digital transition, 21 November 2023.

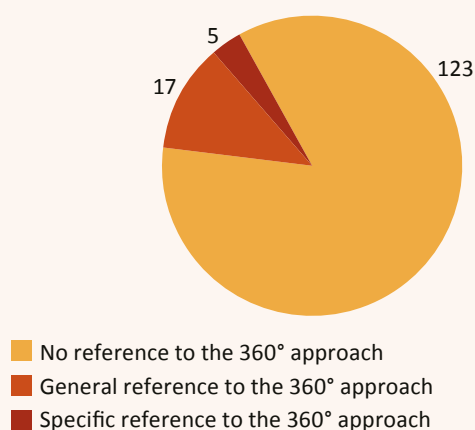
<sup>27</sup> Koen Doens letter.

## ... TO PRACTICE

### Dissemination across EU Delegations

References to the 360-degree approach on Delegation webpages are relatively rare and generally unspecific when they do exist. The absence of dedicated operational material or formal guidance could be the reason. A comprehensive search for the term “360” across 145 EU Delegation webpages resulted in 22 pages (15%) referring to the 360-degree approach. The majority of delegations (85%) did not refer to the 360-degree approach at all, as demonstrated in Figure 4.

**Figure 4. References to the 360-degree approach in Delegation webpages**



Source: authors' compilation from EU Delegation web pages

In the majority of cases in which the 360-degree approach was referenced, these instances referenced the Global Gateway strategy generally or in the context of a partnership or visit.

Even Delegation webpages in countries where Global Gateway flagship projects are put forward as examples of the approach do not necessarily mention it. Brazil, for example, did not include at the time of research any references to the 360-degree approach despite the presence of the Amazonia Verde programme in the country. Similarly, El Salvador and the Kyrgyz Republic did

not contain any references to the approach, while only some of the countries included in the MAV+ programme mention the 360-degree approach. **This tends to show that the 360-degree approach has been, at best, an afterthought.**

On the website of the EU Delegation to Angola,<sup>28</sup> for example, the only reference to the 360-degree approach is part of a paragraph on Team Europe, stating that “Team Europe stands out with a compelling proposition for democratic partner nations [...] promoting long-term drivers of growth through a comprehensive 360-degree approach, encompassing both hard and soft infrastructure, and reinforcing the resilience of nations seeking strategic autonomy”. Here, the 360-degree approach is connected to the idea of “soft” infrastructure, involving a focus on non-physical infrastructure and regulatory and human capital-heavy investments. While this is consistent with the EC’s approach, it does not offer any particular specificity or additional information in the context of Angola.

All this suggests that the 360-degree approach may not be fully (or at least consistently) integrated into Global Gateway implementation at Delegation level. It may also suggest that the concept could be considered rather for internal use, but that would be inconsistent with the Commission’s wide-ranging, public communications on the matter.

### 360-degree approach in the EFSD+ portfolio

We analysed a total of 143 blending operations and 41 guarantees for which information is available on the EFSD+ website. In search of implicit 360-degree aspects, project titles and summary information were analysed for mentions of human development and any of the ten enabling components listed in the 360-degree approach graphic. The proportion of each type of operation referencing these three areas is shown in Table 1.

<sup>28</sup> Global Gateway: European Union Strengthens partnership with Angola in its economic diversification.

**Table 1. Proportion of EFSD+ operations referencing human development and enabling environment components for investments**

	Human Development reference	Enabling environment components for investments
Blending (143 total)	16%	15%
Guarantees (41 total)	29%	12%

Source: *Board approved INTPA blending operations as of 2021 and Overview of EFSD and EFSD+ Guarantees. Despite the title of the source document, it includes operations until the end of 2024.*

stated importance of the 360-degree approach, its components do not yet constitute systematic features of investment-led cooperation or they are not properly followed-up and reported to the public.

The lists and databases published by the European Commission do not include fields to identify whether an operation applies the approach or any of its enabling environment components.

**As a result, it is currently impossible to accurately and objectively trace or quantify the**

**application of the 360-degree approach across the full EFSD+ portfolio.**

Despite the stated importance of the 360-degree approach, its components do not yet constitute systematic features of investment-led cooperation or they are not properly followed-up and reported to the public.

### Our case-studies: the unequal integration of the approach

Drawing on the EU Delegation webpage search and the interventions highlighted by DG INTPA in headquarters presentations, we selected **eight projects that are explicitly framed as examples of the 360-degree approach** by the EC. These cases span several regions and thematic areas—digital connectivity, health manufacturing, green energy, territorial development, and critical raw materials.

Across the cases we analysed, the 360-degree approach **is consistently framed as an integrated model combining infrastructure investment with**

**Table 2. Explicit 360 degree interventions identified, sorted chronologically.**

Project	Country / Region	Sector / Theme	Timeframe
Digital Connectivity	El Salvador	Digital connectivity, skills, digital public administration	2021–2027
Manufacturing and Access to Vaccines, Medicines and Health Technologies (MAV+)	Rwanda, Senegal, Ghana, Nigeria, South Africa, Egypt	Health manufacturing and regulatory strengthening	2021–2040
Digital Connectivity	Kyrgyz Republic	Digital infrastructure, regulation, administrative modernisation	2023–2027
Lobito Corridor	Angola, Zambia, DRC	Transport corridor, value chains, skills, governance	2023–2040+
Green Corridor / Virunga	Democratic Republic of Congo	Renewable energy, conservation, territorial development	2024–2027 / 2030
EU–Zambia 360° CRM Partnership	Zambia	Critical raw materials and enabling environment	2024–2030
Green Amazon / Amazonia Verde	Brazil	Digital connectivity and inclusion	2025–2030
RISED	Ethiopia	Renewable energy and electricity grid modernisation	2025–2030

Source: *review of EC and EU Delegations' webpages*

**institutional reform, skills development and other enabling elements. However, evidence suggests that this integration often remains conceptual rather than fully operationalised.**

This is particularly visible in connectivity programmes where ecosystem building narratives are strong but financing arrangements remain unclear (Green Amazon; Digital Connectivity Kyrgyzstan; Digital Connectivity El Salvador). By contrast, the enabling environment or 360-degree logic appears more structurally articulated in industrial policy type initiatives such as MAV+. Territorial development initiatives also demonstrate integrated narratives but lack detailed information on implementation frameworks and financial transparency (Virunga).

The following synthesis summarises to what extent the ten enabling environment components of the 360-degree approach are actually visible across the case studies.<sup>29</sup> It deliberately avoids treating EU claims as verified impacts. The analysis therefore distinguishes between: (i) elements that are clearly integrated into projects; (ii) elements that are only weakly evidenced or remain largely narrative; and (iii) elements that are mostly absent. Case references in brackets indicate where a point is most visible.

• **Collect more, spend better: systematically absent, revealing a structural blind spot**

Across the case studies, this component is the weakest and most consistently absent (Green Amazon; MAV+; Kyrgyzstan; El Salvador; RISED). There is no evidence of projects targeting domestic resource mobilisation, tax systems, or public financial management. Even where projects interact with economic systems (e.g. MAV+ or connectivity initiatives), the fiscal dimension is not translated into concrete operational measures, tools or objectives. Only limited partial elements appear in Zambia CRM (licensing reform, cadastre digitisation) and Virunga (financial management practices linked to territorial governance), but these fall short of systematic fiscal reform.

This absence is analytically significant: while the 360-degree approach claims to address structural

constraints, it does not appear to engage with one of the core determinants of state capacity and long-term development sustainability - public revenue systems.

• **Norms and standards, including ESG: strong but uneven, with sector-specific depth**

Norms and ESG standards are relatively well integrated, but their scope varies across sectors. They are strongest in territorially embedded and environmentally driven interventions (Virunga, Green Amazon), where environmental governance, biodiversity protection, and sustainability are central to project logic. In connectivity programmes (Kyrgyzstan; El Salvador), ESG appears mainly as digital governance standards – cybersecurity, data protection, and trust frameworks – rather than broader environmental or social safeguards.

In MAV+, standards are narrowly focused on pharmaceutical quality and regulatory compliance (GMP, WHO prequalification), with limited evidence of broader ESG integration. Overall, ESG is one of the more visible components, but its interpretation is sector-specific and often limited to what is required for system functionality rather than broader sustainability goals.

• **Rule of law: operationalised through sectoral governance rather than systemic reform**

Rule-of-law elements are present across several cases but are narrowly defined. They are most clearly embedded where projects directly reshape governance systems (Virunga; Kyrgyzstan; MAV+). In these cases, rule-of-law effects emerge through improved administrative access, regulatory predictability, and enforceable sectoral rules.

However, no case includes broader judicial reform, legal system strengthening, or accountability mechanisms beyond sector-specific governance. This suggests that the 360-degree approach interprets rule of law primarily as functional governance within sectors, rather than as a broader institutional development objective.

<sup>29</sup> More details are available [in the annexes](#).

- **Regulatory reform: one of the most consistently integrated components**

Regulatory reform is among the most consistently present elements (MAV+; Kyrgyzstan; Green Amazon; Virunga; El Salvador). It is particularly strong where investment depends on regulatory credibility, such as in pharmaceutical markets (MAV+) or digital governance (Kyrgyzstan). This is coherent with the EU's self-interested approach in Global Gateway implementation, as regulatory reform is intended to make investments viable but also open markets and be profitable for European companies.

However, the depth of implementation is uneven. In several cases, regulatory reform is described at the level of policy dialogue or planned changes, without clear evidence of implementation, enforcement or outcomes (Green Amazon, El Salvador). This creates a gap between narrative ambition and verifiable institutional change.

- **Employment and youth: largely indirect and rarely operationalised as a core objective**

Employment effects are widely referenced but rarely formalised. The strongest case is Virunga, where job creation is central to the “peace economy” model and explicitly linked to stabilisation and livelihoods.

In other cases (Green Amazon, Kyrgyzstan, MAV+, RISED, El Salvador), employment is treated as an indirect outcome of improved infrastructure or market conditions. There are no clear job targets, labour-market programmes, or youth-specific projects in most cases. This suggests that employment is assumed rather than actively structured within the 360-degree framework, which is aligned with the lack of consistent focus on decent work in Global Gateway overall.<sup>30</sup>

- **Skills and education: consistently present but mostly secondary and sector-specific**

Skills development is one of the most consistently integrated components across all cases (MAV+, Kyrgyzstan, El Salvador, Green Amazon, Virunga, RISED). However, it is largely focused on functional, sector-specific skills: digital literacy, pharmaceutical training, energy-system operation, or technical maintenance.

There is little evidence of systemic education reform, integration into national education systems, or long-term human capital strategies. This indicates that skills are treated as enabling inputs for project success rather than as broader development objectives. This finding is coherent with a 2024 assessment of the EU's support to education in partner countries, which pointed out that the “role of education and skills in Global Gateway lacks clarity”, highlighting that the focus on education is at the service of the investments themselves rather than as an objective of its own.<sup>31</sup>

- **Technology transfer and R&D: central to system-building but uneven in innovation depth**

Technology transfer is a core strength of several cases, particularly MAV+, Virunga and Kyrgyzstan. In these interventions, the transfer of technical systems, operational practices, and standards is essential to making infrastructure functional.

Connectivity programmes (El Salvador, Kyrgyzstan) also demonstrate strong transfer of digital systems and governance models. However, formal R&D ecosystems and innovation systems are less visible outside MAV+, where research collaboration and industrial innovation are more explicitly developed.

Overall, technology transfer is strongly embedded but often oriented toward adoption rather than endogenous innovation.

<sup>30</sup> ITUC, *The Global Gateway's contribution to decent work*, August 2025.

<sup>31</sup> European Commission: Directorate-General for International Partnerships, *Evaluation of the EU's support to partner countries in the education sector (2014-2024) – Final report*, Publications Office of the European Union, 2026.

- **Gender equality: consistently referenced but weakly operationalised**

Gender equality appears frequently in project narratives (Green Amazon, El Salvador, Virunga, RISED), but operationalisation remains weak. Most cases lack measurable targets, indicators, or dedicated gender programmes. MAV+ shows no gender integration in available documentation.

This pattern suggests that gender is treated as a cross-cutting principle rather than a structured intervention area, limiting the ability to assess its actual impact.

- **Investment climate, sustainable financing and access to finance for SMEs: indirect and driven by infrastructure and regulation rather than targeted measures**

Investment climate improvements are generally indirect, resulting from infrastructure development and regulatory reforms (Kyrgyzstan, Green Amazon, RISED). MAV+ partially integrates investment de-risking and market shaping, but without detailed financial transparency.

There is little evidence of dedicated support mechanisms for SMEs or sustainable and inclusive businesses such as cooperatives and social economy enterprises. This suggests that the investment climate component is assumed to improve through system functioning rather than actively engineered.

- **Consultation with CSOs and local authorities: varied levels of engagement**

Among our case-studies, participation is most clearly integrated in territorially grounded projects where local engagement is necessary for implementation (Virunga, Green Amazon). In these cases, community involvement aims to ensure project success and legitimacy.

In contrast, strategic and industrial programmes (MAV+, El Salvador, Kyrgyzstan, RISED) show limited evidence of structured consultation mechanisms, grievance systems, or the use of civil society engagement frameworks (the CSO Roadmaps).

Some EU Delegations have stated their recognition of CSOs in their renewed Civil Society Roadmaps 2026-2028, for instance in the Zambia roadmap<sup>32</sup>, which stresses that “civil society plays a central role in ensuring that development initiatives, investments and policy reforms are transparent, rights-based and beneficial to all citizens”. The impact of the new roadmaps on the actual involvement of CSOs in Global Gateway projects and as part of the wider implementation of the 360-degree approach on the way forward will need to be analysed in the future.

32 EU Civil Society Roadmap 2026–2028-ZAMBIA



# CONCLUSIONS

The 360-degree approach has been presented as a demonstration that the EU's shift toward infrastructure-intensive programming and toward investment- and loan-based instruments rather than grants need not come at the expense of human development objectives. Our findings suggest that, while the 360-degree approach shows potential, significant limitations remain:

Most European Union Delegations do not refer to the 360-degree approach; when references do appear, they are typically brief and generic.

## 1. The 360-degree approach is loosely defined and unevenly applied.

The study finds that the 360-degree approach remains at an early conceptual stage, with minimal written guidance and substantial ambiguity around implementation. Most European Union Delegations do not refer to the 360-degree approach; when references do appear, they are typically brief and generic.

Many of the cases selected for this study had advanced only to early identification or design stages, often due to bureaucratic, procurement-related, or logistical delays. The Green Amazon project, for example, was originally intended to run from 2021-2027 but was only signed in November 2025 and had the timeline adjusted as a result. Consequently, the analysis necessarily focused on design intentions rather than implementation or outcomes, limiting the assessment of human development and inequality reduction. This was especially true in terms of inequality indicators, which were often

not even mentioned, let alone integrated into a completed or ongoing project. The approach's potential remains largely theoretical, with limited evidence of systematic application across the EU's investment portfolio.

## 2. Few projects make explicit references to the 360-degree approach.

Despite the increasing references to the 360-degree approach in public communication around Global Gateway, only a handful of projects make explicit reference to the approach. While eight cases were examined in this brief as "most likely" cases to analyse the implementation of the 360-degree approach, it is worth emphasising the low number of initiatives that are explicitly linked to the approach at all.

## 3. Current integration of 360-degree components depends on how investments are designed.

The eight projects we identified as explicitly linked to the approach seem to be at concept note or very initial proposal stages. This limits the kind of information that is available about them and makes the analysis on outputs and impacts impossible. Furthermore, while most of the projects are centred on hard infrastructure of some kind, that does not imply equal take-up of EFSD+ resources or use of innovative finance. In fact, fewer than half of the cases (MAV+, Digital Connectivity in Kyrgyzstan, and RISED Ethiopia) include explicit references to all three hard components in their descriptions: concrete infrastructure, EFSD+ resources, and the engagement of EU banks and DFIs. Interestingly, these three cases were generally less inclusive of the 360-degree enabling environment components and human development and inclusion elements than the cases with a weaker or non-existent link to EFSD+ resources or engagement of European Banks and DFIs. With additional information and time for the projects to advance, it will be interesting to investigate further to what degree the use of innovative finance can be effectively combined with human development and strong deployment of the 360-degree enabling environment components.

#### **4. A proliferation of new labels has not been matched by operational clarity.**

Related to the transparency gaps, the research reveals that the EU's recent terminology (such as Global Gateway, Global Gateway flagship, Team Europe, and the 360-degree approach) is applied inconsistently and without consolidated documentation to identify which projects fall under which label. In practice, it proves difficult to reconcile multiple lists of Global Gateway projects or to identify comprehensive listings of Team Europe Initiatives.<sup>33</sup> The same applies to projects with explicit references to the 360-degree approach: despite high-level references, only a very small number of interventions could be found that explicitly use the term, and these were scattered across sources. The limited correlation between labels and observable practice suggests that these terms currently function more as political or strategic narratives than as operational categories guiding or structuring EU development interventions.

#### **5. Weak traceability of financial data and links to core investments constrain analyses.**

A further limitation emerges from the difficulty of linking 360-degree branded interventions to concrete EFSD+ operations or financial instruments. In many cases, public information does not specify which components are backed by guarantees, loans, grants, or technical assistance, nor does it present the financial structure, risk-sharing arrangements, or leverage expectations. Some projects identified as 360-degree flagships do not correspond clearly to any EFSD+ project fiche or published financial commitment, and several lack visibility in CRS data due to timing or incomplete reporting. Without clarity on financial architecture, it is difficult to determine whether 360-degree framing influences investment decisions, shifts resource allocation or produces measurable development gains.

The disconnect between narrative framing and financial traceability significantly constrains the evaluability of the approach.

#### **6. A significant lack of publicly available information persists.**

Across all components of this study—including the policy analysis, portfolio review, and case study work—one of the clearest findings is the limited availability, accessibility, and consistency of information on Global Gateway and the 360-degree approach. Efforts to gather documentation revealed major gaps: few publicly available project documents, very limited operational guidance, and inconsistent communication across EU Delegation webpages. Even when the Commission identifies flagship examples or presents the approach at headquarters level, project level information remains sparse, often limited to short summaries without detail on design, implementation modalities, monitoring arrangements, or expected developmental impact.

**Without clarity on financial architecture, it is difficult to determine whether 360-degree framing influences investment decisions, shifts resource allocation or produces measurable development gains.**

Taken together, the findings suggest that the 360-degree approach currently functions more as a strategic orientation than a fully operational development methodology. While the ambition—anchoring infrastructure investment in its context and linking it with human development outcomes—is conceptually compelling, the mechanisms for implementation, learning processes, time horizons, and transparency frameworks are not yet aligned. Moreover, the connections between the key elements of the 360-degree approach (hard components, enabling environment components, and human development pathways) are not yet fully evident.

<sup>33</sup> A [Team Europe Initiatives tracker](#) is available, but the amount of information provided is generally limited.

# POLICY RECOMMENDATIONS

In light of our findings, we call on the Council of the EU and EU Member States, the European Parliament and the Commission to **give full effect to the 360-degree approach by taking action to round it out and thereby maximise benefit to people and the planet, minimise risk and damage, and offer clarity for all** involved in the Global Gateway,<sup>34</sup> including the EU’s international partners.

1. **The 360-degree approach should ensure the EU gives effect to its international partnerships’ policy commitments and legal obligations.**
- 1.1. The 360-degree approach builds on the **EU’s preexisting commitments and obligations**, and links with the implementation of the six Global Gateway principles. In view of the unequal implementation of the

approach, as demonstrated in this brief, the European Commission should ensure that **all commitments and obligations are comprehensively and systematically implemented across all projects, without selective application**, with any exceptions duly justified.

**Explicitly matching the components of the 360-degree approach and the EU’s legal obligations and policy commitments** could provide key support and guidance for implementation and mitigate fears of introducing an extra burden on project implementers.

The following table gives CONCORD’s non-exhaustive proposal to illustrate how the various elements can be combined coherently.

**Table 3. The 360-degree approach components and pre-existing commitments.**

360-degree approach components	Pre-existing commitments at EU level		Global legal and policy commitments adopted by the EU
	Legal obligations	Policy and implementation	
<b>Collect more, spend better</b>	Regulation establishing the Neighbourhood, Development and International Cooperation Instrument-Global Europe (NDICI-GE) - Article 3.	DG INTPA 2016 Staff working document, Collect more - spend better - achieving development in an inclusive and sustainable way.	Sevilla Commitment (Fourth International Conference on Financing)
<b>Norms and standards including ESG</b>	<ul style="list-style-type: none"> <li>● NDICI-GE - (i) Article 3 laying out the Instrument’s general objectives. (ii) Article 29(b) on excluded activities.</li> <li>● EU updated Nationally Determined Contribution under the UN Paris Agreement</li> <li>● Taxonomy Regulation.</li> <li>● Corporate Sustainable Due Diligence Directive</li> <li>● EU Deforestation Regulation</li> <li>● Financial Regulation</li> <li>● New European Consensus on Development</li> </ul>	<ul style="list-style-type: none"> <li>● Greening Toolbox</li> <li>● Environmental Screening</li> <li>● EU Action Plan on Human Rights and Democracy (2020-2027)</li> <li>● Human Rights-Based Approach Toolbox</li> <li>● EU Strategy on the Rights of the Child</li> <li>● EU Strategy on the Rights of Persons with Disabilities 2021-2030</li> <li>● EU Strategic Framework on Human Rights and Democracy</li> <li>● Do no harm principle</li> <li>● Inequality Marker (I-Marker)</li> </ul>	<ul style="list-style-type: none"> <li>● OECD DAC recommendation on the conditions of aid</li> <li>● UN Paris Agreement on Climate Change</li> <li>● Human Rights UN and Council of Europe/EU legal frameworks</li> <li>● UN Convention on the Rights of Persons with Disabilities (CRPD)</li> <li>● Strategic Environmental Assessment and/or Environmental Impact Assessments- where appropriate.</li> <li>● United Nations Guiding Principles on Business and Human Rights.</li> <li>● OECD DAC blended finance principles</li> <li>● OECD DAC Disability Marker</li> </ul>

<sup>34</sup> These recommendations are complementary to those previously shared by CONCORD regarding Global Gateway, notably as part of the 2026 *Blended finance and the illusion of development* report.

360-degree approach components	Pre-existing commitments at EU level		Global legal and policy commitments adopted by the EU
	Legal obligations	Policy and implementation	
<b>Rule of Law</b>	NDICI-GE - Article 3 laying out the Instrument's general objectives.	EU Human Rights and Democracy Action Plan and Human Rights and Democracy Country Strategies	International Human Rights law and International Humanitarian Law
<b>Regulatory reform</b>	References across NDICI-GE	<ul style="list-style-type: none"> <li>Public Expenditure and Financial Accountability (PEFA) programme</li> <li>Better regulation toolbox</li> </ul>	SDG 16
<b>Employment and youth</b>	Widely included in NDICI-GE	<ul style="list-style-type: none"> <li>Youth Action Plan (YAP) in EU external action 2022-2027</li> <li>Youth Sounding Board</li> </ul>	ILO standards SDG 8
<b>Skills and education</b>	NDICI-GE recognises <b>Education</b> as an area of intervention for thematic programmes (See NDICI Regulation Annex).	<ul style="list-style-type: none"> <li>E-learning on strengthening education systems (INTPA academy)</li> <li>EU Strategy on the Rights of the Child</li> </ul>	<ul style="list-style-type: none"> <li>Global Partnership for Education (GPE) and Education Cannot Wait (ECW).</li> <li>SDG 4</li> <li>Education in emergencies</li> </ul>
<b>Technology transfer and R&amp;D</b>	The NDICI-GE promotes investment in the <b>digital sector and R&amp;D</b> across thematic and geographic envelopes (See NDICI Regulation and Annexes).		SDG 17
<b>Gender equality</b>	<ul style="list-style-type: none"> <li>NDICI-GE, establishing Gender Equality spending targets.</li> <li>Treaty on the Functioning of the European Union (Article 10)</li> <li>European Charter of Fundamental Rights (Article 23 - Equality between women and men).</li> <li>New Consensus on Development</li> </ul>	<ul style="list-style-type: none"> <li>Gender Equality Action Plan III</li> <li>EU Gender Equality Strategy</li> <li>EU LGBTIQ Equality Strategy</li> </ul>	<ul style="list-style-type: none"> <li>SDG 5</li> <li>ICPD Programme of Action</li> <li>Beijing Platform for Action</li> <li>Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) convention</li> <li>OECD DAC recommendation on ending sexual exploitation, abuse and harassment in development cooperation and humanitarian assistance</li> </ul>
<b>Investment climate</b>	NDICI-GE, Annex II	Risk Management Framework Plus (RMF+)	OECD-DAC blended finance principles
<b>Consultation with CSOs and local authorities</b>	Enshrined across NDICI-GE.	<p>2012 European Commission Communication The roots of democracy and <i>sustainable development: Europe's engagement with Civil Society in external relations</i> and the Civil Society Roadmaps</p> <p>2025 EU strategy for Civil Society</p>	OECD DAC recommendations on enabling civil society in development cooperation and humanitarian assistance

**1. 2.** A well-implemented, coherent 360-degree approach can be a tool for transparency to monitor the alignment of programmes with EU commitments. Every project should be required to explain, **ex ante, how it implements those commitments and how they benefit communities**, e.g. in the application forms for the Global Gateway investment Hub, so that compliance with the approach can be assessed among other eligibility criteria. Such information should also be easily accessible via a single Global Gateway platform detailing all programmes and the state of their implementation. **The exclusion of any 360-degree components should be the exception and be duly justified.**

A well-implemented, coherent 360-degree approach can be a tool for transparency to monitor the alignment of programmes with EU commitments.

**1. 3.** The 360-degree approach can contribute to human development and tackling inequalities and it is therefore essential, because the commitments underpinning it should allow the EU to reach the most marginalised:

- Global Gateway must explicitly align with the CRPD by embedding accessibility, participation of persons with disabilities, and safeguards against institutionalisation for all investments.<sup>35</sup>
- It should help effectively integrate the Inequality Marker (I-Marker) throughout project cycles, including Distributional Impact Assessments + (DIA+) that demonstrate empirically that the bottom 40 per cent (in terms of wealth, income and consumption and/or other socio-economically disadvantaged groups and individuals) have been reached by the projects.

- Meaningfully integrate gender equality, in line with the Gender Action Plan III and its successors, including by ensuring Global Gateway programmes contribute to reaching at least 85 per cent of all EU ODA to be dedicated to programmes that have gender equality as one of their objectives (OECD marker G1 or G2) with 20 per cent of ODA dedicated to gender-targeted projects (OECD marker G2).

**1. 4.** Actual implementation requires **clearer political recognition, more guidance and greater shared understanding** across the European Commission, EU Delegations, Member States, partner countries — including local authorities —, Development Finance Institutions, CSOs and private sector organisations involved in implementation.

A dedicated **Staff Working Document**, a European Commission **Communication**, an operational **toolkit**, and continued **training** efforts are needed for more consistent and coherent implementation of the EU's obligations and commitments. If adequately anchored in the EU's theoretical and practical approach to Global Gateway, the 360-degree approach can bring together, systematise and provide greater coherence to the tools already available to support their implementation. The new **Global Europe Instrument** should also embed the approach.

**1. 5.** Ensuring **local ownership from the initial conception of Global Gateway projects and in their implementation must be a crucial objective of the approach**, as it is enshrined in the EU's obligations and key to ensuring that infrastructure projects are sustainable and truly address local demands. **Adequate consultation with and involvement of CSOs — including in-country organisations —** before, during and after implementation is one essential way to achieve that objective. Qualitative ex ante and ex post assessments can provide precious information to ensure projects do no harm and reach the most marginalised and address inequalities.<sup>36</sup>

<sup>35</sup> In line with the [2025 CRPD Committee recommendations](#) (paras. 49 and 75).

<sup>36</sup> For more information on qualitative assessments, see CONCORD, [A Gateway to Equality?](#), 2024.

2. **The 360-degree approach being embedded in Global Gateway investments is not a substitute for standalone grants-based human development programmes. Grants remain a key tool in the international cooperation financing toolbox as actions in their own right to address human development and inequalities and to achieve the SDGs.**

As our findings show, Global Gateway projects address human development as part of the logic of investments and private sector engagement. Yet, poverty and inequality reduction and human development require dedicated, focused action, including substantial investments to strengthen public sector provisions, such as primary healthcare and education. This also means focusing human development actions in the areas that may most benefit from them.

**The commitments underpinning the 360-degree approach should allow the EU to reach the most marginalised.**

**Grants that are not subordinate to investments but independent actions supporting development bodies, such as CSOs, are therefore essential** among the policy tools for international cooperation. The EU and EU Member States must ensure adequate ODA levels, focused on its original purpose: fighting poverty, tackling inequalities, and enabling human development — especially in countries and communities most at risk.<sup>37</sup>

3. **Investments can only be effective where the appropriate ecosystem exists. The full 360-degree approach is a prerequisite for projects to be implemented in a way that is compatible with EU values, reflects the EU offer, and causes no harm.**

This also requires **policy coherence** across the EU's external action. Other EU policies and mechanisms, such as trade agreements, should not have a negative impact on the 360-degree approach or outweigh the positive impacts that investments and grants can generate. The EU should therefore apply its **Better Regulation toolbox and impact assessments** with a focus on partner countries.

Mechanisms to translate EU standards into practice must exist, either through instruments beyond Global Gateway or, where these are insufficient, through new mechanisms within Global Gateway governance.

Finally, **coherence within Global Gateway itself is essential**. The different elements in the 360-degree approach should not undermine one another. For example, creating an enabling environment for business should not mean influencing decision-making or legislative changes in partner countries to suit foreign investors instead of addressing obstacles faced by local businesses and smallholder farmers.

<sup>37</sup> For more information on our ODA recommendations, see CONCORD's [AidWatch report 2025](#).

# OUR MEMBERS



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