CONCORD contribution to the Public Consultation on the External Financing Instruments of the European Union

PART 2: Full reply to the EU online public consultation questions

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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.

CONCORD recommends that efforts be increased in mainstreaming democracy and human rights including gender equality. Gender should be clearly visible in all programmes, results statements, resources dedicated to gender equality, and in the approaches taken in day-to-day implementation. This is not the case in a large majority of programmes today. Further steps 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.

Overall, the design of the DCI instrument successfully combines country programmes, thematic programmes and the programme for support to CSOs and local actors, but there are several issues to address in regards to implementation. The heavy procedural requirements continue to pose challenges both to EU staff and grant beneficiaries. Another issue is the continued tendency to work with different thematic areas separately, despite the fact that better cross-cutting approaches was a main aim of joining several programmes of the previous MFF into one with the GPGC programme.

Additionally, the role and potential of civil society organisations is not considered in a strategic manner. The CSO-LA can also be a key programme to address the shrinking space for civil society organisations, and support hard to reach partners. But just as important is the fact that CSOs have a role to play in other thematic programmes based on their experiences, knowledge and thematic focus, as well as in country programmes. The DCI can take a cue from the EDF in promoting specific civil society envelopes also in country programmes, since strengthening civil society should be an important part of any strategy for national development, and civil society organisations can also be important actors in supporting other parts of the realization of national development plans, provided that their independence and right of initiative is respected.

CONCORD has produced in-depth observations and recommendations on the CSO-LA thematic programme and the different strands of the GPGC thematic programme of the DCI. Please find these observations and recommendations here: https://www.concordeurope.net/hubs/hub3/files/public_consultation_on_the_mid_term_r
8 How well do you think the DCI has addressed the objectives of development cooperation 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.

The phasing 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 strong 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. 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 reluctance of some governments on human rights and governance issues can challenge the principle of ownership. This is however one of the reasons that involvement of local civil society, and particularly 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.
The restrictions on the space of civil society to work, organize and assemble need to be counteracted by relevant financial and capacity building support as well as strengthening political dialogue and human rights interventions. The EU Roadmaps for support to civil society are one tool to facilitate a comprehensive and coordinated approach.

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 objectives of development cooperation funding must be to eradicate poverty and leave no one behind, as stated in the Agenda 2030. Development cooperation funding should be based on the needs of populations, and aligned with the development priorities of recipient countries, and not serve to pursue objectives related to the EU internal political agenda, such as control of migration and externalization of border management.

Migration has been an overarching priority for the EU as shown in the establishment of Trust Funds, the Turkey coordinating facility and inclusion of a focus on migration in other work (beyond the trust fund and the work financed by the funding available for Asylum and Migration budget from GPGC).

Since the new Financial Regulation allowing the creation and administration of Trust Funds by the EC, five Trust Funds were created in three years. In order to allocate funding to the new Trust Funds the EU allowed reserves to be pooled. Although the trust fund approach has allowed flexibility for the EU to award contracts faster, but has meant very short deadlines for Civil Society Organisations to submit amended concept notes or full proposals. Moreover, concerns regarding transparency and efficacy are raised by CSOs regarding these trust funds.

We caution against the blurring of objectives and pre-empting the Asylum and Migration objectives in the GPGC with Trust Funds that might create confusion in programming for potential recipients (or beneficiaries). Furthermore, it is obvious that high amounts of funding will be directed towards migration objectives, however we would warn against quick fit solutions without taking the context and all development aspects of Migration in full consideration.

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

Development Cooperation Instrument

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.

It is very early to assess the EDF implementation compared to its original plans; some new programmes are not yet approved, such as part of the intra ACP envelope. It is possible to see shortcomings in some EDF envelopes: the compiled National Indicative Programmes (NIPs) are not delivering on agreed benchmarks of 20% of funds to human development/social inclusion and climate action respectively. Both currently represent approximately 14% the budget (health and education amount only to around 10%). Programming should deliver on existing benchmarks.

The EDF's co-management system is valuable in ensuring ownership and equal partnership. However, some existing research (ECDPM) indicates that the choice of sectors is not always balanced, with EU HQ having a bigger say.

Rights-based approach
The respect and promotion of human rights is a basis for the Cotonou Agreement and the 11th EDF regulation. The NIPs often refer to these in the overarching principles of cooperation. However, only those ACP countries that have chosen good governance as focal sector seem to programme funds for Governance and the Rule of Law. The concern for human rights does not seem to be reflected under other sectors, namely those that are not human development-related. Attention is often paid to some groups, such as women and young people, as the ‘most vulnerable’, but the vulnerability approach implies lack of a rights-based analysis and not all NIPs refer to disaggregated data so it is not clear if this level of detail is taken into account.

Gender perspectives
The big majority, if not all, NIPs refer to gender equality as a cross-cutting issue. However, this focus is not translated in the specific description of EU support. Amongst the 74 available NIPs 28 include some reference to gender equality, 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 gender-sensitive budgeting or gender elements on the evaluation matrix. 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. This might reflect lack of capacity for mainstreaming gender equality, albeit good intentions.

Considering that some countries were still undergoing a gender profile at the time of defining the NIP, we would hope that the upcoming report on the implementation of the Gender Action Plan could provide more clarity.

We would recommend that the midterm review of the EDF include many more efforts, both mainstreaming and targeted actions, to further gender equality in ACP countries. Failing to
do so might perpetuate the insufficient progress, as the recently published EC evaluation of the ACP-EU partnership showed (‘EU’s strong policy commitments on gender equality and the empowerment of women have not always been matched by its organisational capacity to deliver results’). There is also a need for more capacity in place in the EUD, the National Authorising Officer or even other national actors. The role of CSOs is particularly relevant here, as they are well placed to inform the gender profile in-country. This type of engagement is however lacking: only 11 out of 74 NIPs indicate that gender equality will be pursued by CSOs. Plus, recent CONCORD EU Delegations Report 2017 shows that ‘almost 65% [of survey respondents] are not aware of the existence of a gender analysis and/or of EUDs’ plans for implementing the EU Gender Action Plan, even though many of them work on these issues’.

**Funding mechanisms**

The EDF seems to be the major source of several new funding mechanisms, be it blending or pooled funds. While it is understood that some of this comes from EDF reserves, the consequences of the growing number of mechanisms on the risk of diverting funds from EDF programmes is not yet clear. On a newly created blending facility, the European Fund for Sustainable Investment (EFSI), the European Court of Auditors published a report challenging its positive impact, and criticizes that this fund has nonetheless been extended and used as a model for similar funds, such as the EFSD. If funds are diverted from the EDF for new ‘emergencies’, there must be a thorough impact analysis, an evaluation of where funds are taken from, how the needs they were supposed to address will be addressed.

For all blending facilities, it is fundamental that mechanisms are put into place to ensure complementarity between grants and loans/guarantees, and that the benefits of private sector engagement outweighs extra costs or risks for sustainable development outcomes. Equally important is to ensure that the different stakeholders can meaningfully participate in this monitoring exercise. Recipients of funds should report transparently and timely, in order to assess sustainable development outcomes, and that investments are in line with environmental, social and human rights standards.

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.

**Civil society involvement**

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 process’.

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.

Financial support to CSOs
According to the CPA, CSOs should be provided with capacity-building and financial resources for supporting the implementation of cooperation strategies; as such, bilateral cooperation might include a specific civil society envelope. In the case of the 11th EDF approximately 60% of countries opted for this envelope. This reflects an increase of countries who have opted to have a specific CSO envelope: 43 ACP countries under the 11th EDF, against 35 in the 10th and 21 in the 9th EDF. But there are still 30 countries who preferred not to have a CS envelope, some of which justify so in the NIPs due to ‘failed past experiences’ and ‘unavailability of appropriate NSAs’, which disrupts the spirit of the CPA with its focus on partnership and capacity-building for CSOs.

The level of financial support for CSOs as implementers also varies significantly, both in terms of volume and %. Almost half of these envelopes (18) are designed for CSO support to domestic accountability; 14 aim at supporting focal sectors and the remaining 11 aim at enabling environment to CSOs, including respective capacity-building. It is important to note that the lack of earmarked funds under the EDF however does not necessarily exclude CS involvement in implementation of programmes or in promoting accountability, be it at national or EU assistance level. E.g. one ACP country suggested establishing monitoring mechanisms for involvement of CS in policy dialogue and management of public funds, hence contributing to more sustainable domestic resource mobilisation.

Nonetheless, we would welcome further complementarity with other thematic programmes, e.g. CSO/LA of the DCI (at least 3 ACP countries do not have any CSO-LA allocations). The financial support is sometimes disproportionate to country’s needs – e.g. Kenya, despite being currently considered a lower middle income, has been suffering from increasing inequalities. The decentralisation process – devolution - that the country has been undertaking with increased decision-making authority at sub-national levels occasionally undermined the allocation of adequate resources and provision of key services at the local level. In such processes, the role of civil society is fundamental to ensure accountability at all governance levels, requiring CSOs being active at multiple levels across
the country rather than remaining mainly at national level. Despite this need, Kenya does not have any envelope for CSOs under the 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.

The comments at hand focus on the first three objectives of the EIDHR. An analysis of AAPs and MAAP shows that plans have mostly stayed true to the priorities set out in the MIP.

Objective 1 – Support to human rights and HRDs in situations where they are most at risk:
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 new mechanisms: 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 will appreciate if the Commission shares its first experiences with the new mechanisms applied and if lessons are integrated in the next programming cycle.

Objective 2 – Support to other EU human rights priorities:
The (M)AAPs have addressed the intended focus issues throughout the years, especially with changing priorities under various lots of global calls. CONCORD recommends the next MIP to pay special attention to children and youth, particularly girls, and children with disabilities. Important themes include youth empowerment and strengthening community-based child protection services, especially in emergency situations and to prevent sexual exploitation and trafficking of children. The inclusion of boys and men is crucial in order to address prejudice and the prevailing patriarchal culture.

Objective 3 – Support to democracy:
The MIP describes this objective as a central instrument to fund CS as key actor for democratization. While the MAAP 2016-2017 includes support of 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 for civil society space at all levels (especially supporting ‘home-grown advocacy’).

**Rights-based Approach**
The rights-based approach (RBA) should be intrinsically linked to and at the core of the instrument. (M)AAPs build on the EIDHR’s added value, namely, its independence of action allowing interventions in the most difficult country situations worldwide and without the consent of the host government, creating synergies where geographical instruments are challenged to act. CONCORD’s constituency largely recognizes the EIDHR’s complementarity and added value (i.e. in terms of funding specifically for human rights initiatives, including very sensitive issues; reaching different categories of organisations and beneficiaries in a more direct way where it is most needed; the broader eligibility requirements which make it more accessible to many countries with a clear need for human rights interventions. CONCORD supports the explicit statement in the MAAP 2016-2017 that the EIDHR will continue to focus on this added value and that it cannot compensate for the dismantling of traditional development cooperation operations.

**Gender**
CONCORD recommends including Women’s Rights and Gender Equality more consistently throughout the next MIP and annual programming (see more elaborate recommendations on gender equality perspectives across all instruments under question 56).

**Consultation and dialogue**
In recent years there has been regular consultation of civil society at Brussels level. Early engagement with civil society in development of content and funding mechanisms will also be much appreciated in the coming strategic cycle. EIDHR is a central instrument for local organisations and HRDs, and strong efforts are needed by all EU delegations to maintain a close dialogue with civil society about human rights issues and EIDHR programming in the country.

**The role of civil society in the implementation**
The EIDHR considers civil society the main target and actor. The implementation of EIDHR projects is often challenging, in view of the political situation in country and actions which often challenge legislation or practices. The role of EUDs in supporting an enabling environment for CSOs is therefore crucial. Efforts to support CSOs could be stepped up further, e.g. by backing CSOs in their advocacy for human rights, particularly where dialogue with the government is difficult. The EU should also maintain close collaboration with CSOs to help ensure that EIDHR calls address the most urgent and emerging areas of need. Due to the current backlash on HRDs, it is essential to keep supporting HRDs.

**Funding mechanisms & allocation**
The budget for the EIDHR has remained relatively stable in the last years. The use of relatively modest grant sizes has allowed a wide range of organizations to access funds, and has been a positive feature of EIDHR funding.
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.
Organisations in the CONCORD constituency relate mostly to the support for human rights and democracy and are not closely involved in the electoral observation component.

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.
In preparation of the MAAP 2016-2017, CONCORD expressed concern regarding the global trend of closing space for civil society. CONCORD therefore recommended to enhance the focus on the following themes:
1) Protection and preparedness of civil society organizations and Human Rights Defenders to proactively prevent closure of space or react to closing of space: Helping civil society actors better navigate their own security and privacy, improve their legitimacy by strengthening their backing from the population/their constituency (downward accountability), enhance organizational structures (incl. sound auditing, donor reporting, registration) and self-identified standards, analyze and ‘read’ politics effectively.
2) Advocacy at national, regional and global level on civil society space:
The MAAP 2016-2017 subsequently included a list of priority areas for support that mentioned support to inclusiveness and pluralism of CS, and to counter the worrying trend of shrinking space for civil society. CONCORD urges the European Commission to further step up efforts around this issue in the next strategic cycle.

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

The EIDHR should focus on the economic, social and cultural rights of people of all ages, from children to the elderly, as much as civil and political rights.
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 Neighborhood 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.

We welcome the approval and implementation of a Civil Society Facility South aiming to develop alternatives that foster participation and accountability, facilitate an open space for partner CSOs to work with youth and women leadership, and start developing its collective of supporters and volunteers, who will want to contribute to democratic processes and initiate a step by step structured policy dialogue.

This dialogue should lead to improving coherence and a joint vision on the partnership between the EU and the countries from the Southern Mediterranean Region: at EU level (several institutions engaging in the process), at CSOs level (high diversity of actors) and country level (local and national authorities).

However, from a civil society perspective, we do believe that these initiatives are not enough to support a real empowerment of civil society in the region and to address its many challenges (democracy, rule of law, gender empowerment, political participation, protection, freedom of expression, etc). There is still a lack of recognition from the EU of the different roles and capacities of CSOs, and consequently CSOs are facing difficulties to access funds to implement their programs (beyond democratic participation and young leadership). The right of initiative of CSO needs to be respected and protected at all levels.

The ENI, being a geographic instrument, is mainly implemented through country governments, member states agencies and regional organizations and processes. There are also some notable new mechanisms to address some of the region’s biggest challenges of the last 3 years:

- **The Civil Society Facility South**: The objective of this fund is to support CSOs, but so far the themes, the type of initiatives covered and the kind of CSOs that could be involved are insufficient to fulfill the objective. The only options available have been: attendance to trainings, attendance to forums/conventions/dialogues and ToT. We encourage the EC to use part of the CSFS funds to address CSOs’ needs in the region.
This could mean funding through EUDs to let CSOs propose different actions according to their needs and context. This is how the facility has worked sometimes in the past in a coordinated way with the CSO-LA instrument. One of the conclusions of the Evaluation of the ENI goes precisely in this direction: *In several cases, a joint facility for ENI and DCI/CSO-LA was set up since both instruments share a very similar approach in their support to civil society*.

- **The Emergency Trust Fund for Africa- North of Africa Window**: Compared to the rest of the windows and given the extremely complex and sensitive political nature of the European response to the humanitarian crisis in the North of Africa, the priorities selected for this window are very limited and referred to migration management. The way this window has been managed has practically excluded the participation of CSOs. In other windows of this instrument, like the Sahel and Lake Chad one, the involvement of INGOs has represented approximately 20% of the total funds.

- **The Madad Trust Fund**: The Madad Funds is an example of ENI’s capacity to mobilise large amounts of funds in response to crises, and to provide EU member states with a targeted financial and operational vehicle.

The joint programming efforts undertaken by the EU and EUTFs are distinctive characteristics of ENI (as opposed to the previous period) which help to avoid scattered interventions. In addition, budget support (through grants) is another unique feature of the ENI compared to other donors, in particular for middle-income countries.

One of the challenges of the ENI is the implementation of the EU Gender Action Plan 2016-2021. In this sense, we welcome the approval of the project Empowerment of young women and men in the Neighbourhood South with an amount of more than 11 m€ to support civil society initiatives. In addition, the recently approved regional project *Support to job creation, economic development and inclusiveness (14m€)* implemented through call for proposals give CSOs an opportunity to have a say and receive financial support from the EU. We strongly recommend implementing these kinds of CSO-targeted initiatives in these areas (gender, youth, job creation, etc.) also at the country level to give all kinds of organizations a chance to participate and better reach local and national level organizations.

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.

CONCORD does not have sufficient insight into the EU-ENI partner country relations to comment on this question.
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.
One key recommendation extracted from the recently published evaluation report is to increase the amounts available for supporting the stabilization of the Neighbourhood to improve the coverage of crisis prevention by ENI while keeping the balance with a long-term development perspective and to facilitate the possibility to pool resources between ENI and other funding instruments for this purpose. The evaluation report also says that this should be the case “where relevant for EU vital interests”. In this regard, CONCORD strongly takes the position that development cooperation should be based on the needs, priorities and rights of people living in poverty or oppression, and the migration and security policy interests of the EU should not be the point of departure for aid priorities.

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

Greenland decision N/A
Questions 24-26. N/A
Instrument contributing to Stability and Peace

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. 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.

We have many concerns about that amendment and are generally reluctant to the use of ODA in support of military or quasi-military expenditures, or to channelling aid through military actors. Any misuse of aid in this area can have extremely serious consequences, both for affected people in recipient countries and for CSOs working with the EU in conflict and fragile situations, but also for the credibility and public support for ODA. Under no circumstances should the EU engage with security actors, including military actors, if these actions are not listed in the applicable reporting directives in the OECD-DAC guidelines.

We also fear that 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.

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, IPAII, 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.

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 counter terrorism, organised crime, and cybersecurity or should the IcSP rather limit its engagement? Please give reasons for your views.

The current size and thematic scope of the IcSP limits the instrument’s ability to respond to emerging peace and security issues including cybersecurity and counterterrorism. To address this, the EU should explore mechanisms by which the instrument can be adapted to respond to hybrid conflicts, whilst maintaining its flexibility and appetite for funding innovative programming.

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 perspective, it would be an achievement, in the current political climate, 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 holds EU institutions accountable for what funds will be spent.

Instrument for Nuclear Safety Cooperation N/A
Questions 33-35. N/A

Instrument of Pre-accession Assistance N/A
Questions 36-39. N/A

Partnership Instrument for cooperation with third countries N/A
Questions 40-44. N/A

Common Implementing Regulation N/A

45 Your views on the findings, conclusions and recommendations of the CIR evaluation are welcome here.
CONCORD does not have a jointly developed assessment of the CIR evaluation.
Additional Comments

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

CONCORD is in the process of preparing for internal and external discussions on the next MFF, and is considering which future initiatives would be desirable based on the ongoing discussions. 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 negatively affect the level of investments in other key global challenges. CONCORD 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 well-being.

In addition to facilitating discussions within its membership in the coming months, CONCORD would recommend the EC to facilitate similar multi-stakeholder discussions including 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 by CONCORD’s members 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.
- Peacebuilding 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?
See the answer to the above question.

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 other policies strive to be consistent with development goals. Not the other way around. 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 continued development of 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 which unit or EU delegation you ask, and dialogue with civil society
has been neither systematic nor consistent. A weakness of EU trust funds as 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, focused 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 African 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 fund 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)?

Based on CONCORD’s mandate, we will answer the questions on flexibility and simplification from the perspective of civil society organisations. CSOs are adapting to a changing EU funding landscape, and EU funding rules should also adapt to make the new funding landscape enabling.

Within EU development cooperation, the last few years have seen the introduction of new financing mechanisms, increased pressure on the limited administrative resources of the EU
institutions and higher demands from member states on achieving impact and visibility. Civil society organisations have experienced shifts in EU support to CSOs in many forms, such as new types of guidelines and mechanisms, increased expectations to compete and partner with other types of stakeholders and to be able to assemble large programme operations and consortia.

Given these changes it is important that the EU adapt its rules and guidelines for funding to CSOs to fit the changing expectations. The trend towards larger projects and budgets are not a consequence of what is the most effective way to strengthen civil society in partner countries, but rather a response to the practical needs of the donor. A CONCORD study of new funding mechanisms in 2015 found that new funding mechanisms had been introduced in ways that reduce the administrative burden of EU institutions, rather than an equally enthusiastic introduction of all new funding mechanisms discussed in the Structured Dialogue. Below is a list of important reforms of EU funding to CSOs needed for CSOs to engage in a somewhat more fair competition with others.

Some important changes to enable CSOs to function in the new reality of EU grants suggested by CONCORD’s constituency are:

1. Acknowledgement of the risks, resources and time required to coordinate large consortia and programmes and/or re-granting schemes, including sufficient resources for coordination, capacity development and M&E.
2. Adapting the share of pre-financing to reduce risks of problems with cash-flow and liquidity when implementing larger programmes.
3. Significantly reduced share of required co-funding
4. An increase of the flat rate of indirect costs to at least 15%, to better fit the terms on which other stakeholders operate.
5. Extending the options for the timeframe of actions to longer than 2-3 years.
6. Improved transparency and long term overview of the expected grants under this programme and their anticipated focus, to be able to spend more preparation time building alliances, align with other initiatives, preparing to integrate innovative approaches from other actions, etc.
7. Flexibility and understanding of EU delegation staff when it comes to challenges that grantees may face in terms of changing country contexts, project and budget amendments, financial rules, etc.
8. To avoid requirements in guidelines which create artificial limits on for example the number of applications, which limits innovation and creativity in organisations and networks.
9. Acceptance of in-kind contributions as part of the co-funding (as proposed by the EC for the revision of the Financial Regulations)
10. Consider rules for sharing of risks within consortia.

54 Should EU external assistance focus more on approaches based on incentives?
CONCORD sees the increased focus on results as a positive development, as it allows for greater accountability regarding the use of EU taxpayer money and towards partners in third countries. At the same time, CONCORD welcomes Art 121 which leaves the flexibility of using the most appropriate form(s) of Union contribution, from reimbursement of incurred costs, to lump sums or flat-rate financing, with financing linked to the achievement of results being only one of these.
Moving towards a Payment by Results (PbR) approach, which is a relatively new aid mechanism with limited evidence base to date, can be challenging for non-profit entities, due to the high levels of financial risk involved and requirements for pre-financing. In parallel, this approach requires high-level expert knowledge and skills on all levels within a donor and a very robust monitoring and evaluation system, in order to avoid perverse incentives.

It is imperative to construct clear definitions and a common understanding of what is meant by “result”, or output, and what “essential conditions” would trigger the payment in order to avoid conflicting interpretations, including by EU delegations. This should also take into account the specific nature of grants and grant beneficiaries (vs contractors) who own their initiative and are partners in designing and co-funding development actions. Conditions for triggering the payment should be adapted to development projects aiming at long-term complex changes or being implemented in adverse contexts.

The above is of particular importance if we consider Article 127, point 41, which currently grants the Authorising Officer significant room for interpretation and discretion when making decisions on the reduction of grants due to poorly or partially achieved, or late results. CONCORD is concerned about such level of discretion in a PbR model, which risks being highly subjective if the appropriate safeguards are not in place.

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 also be applied there. A close and ongoing dialogue between the EU institutions and civil society on the PRAG is important. 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. When rules are changed to be more readily interchangeable, therein lies a significant risk that the different instruments and stakeholders may also be perceived as interchangeable by EU staff. Any changes made to make rules more convergent should be carefully analysed to ensure that the changes do not negatively impact the rights of initiative and ownership of grant beneficiaries.

The EC proposal promotes the use of simplified forms of grants, through either 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 relatively low until now, 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 CONCORD 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.

Additional comments

56 If you have any other views on the future instruments you would like to share, they are welcome here.

Recommendations on gender equality

The EU’s Gender Action Plan (GAP II) includes important commitments by the EU and all Member States to increase financing and programme support to achieve gender equality. In order to achieve gender equality by 2030, in line with the SDGs, the EU must honour these commitments.

Current commitments

With the adoption of the GAP II, the EU and all Member States are committed to this target: By 2020, 85% of all new programmes must score Gender maker 1 (gender as a significant objective) or Gender marker 2 (gender as a principle objective). The Council Conclusions for GAP II also call on all parties to secure sufficient financial and human resources to fully deliver on the EU’s commitments to gender equality, and stress the need for increased funding to ensure the effective implementation of the GAP. The action plan points specifically to the 2017 Mid Term Review of the MFF as an important moment to review the dedicated funding for gender equality.

Mainstreaming and targeted actions

According to the latest statistics from the OECD DAC, only 17% of the ODA coming from the EU institutions scored G1 or G2. This was a decrease since 2013 when the EU institutions reached 34%. However, many Member States are making significant progress and some member states: Belgium, Denmark, Greece, Italy, Spain, Sweden and the U.K, are now reaching levels above 50%. Nevertheless, the percentage of programmes or projects scoring

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G2, which is equivalent to targeted action for gender equality, is very low. In 2013-2014 only 1-2% of the ODA administered by the EU institutions went to targeted action, and the foreseen budget allocation to gender equality remains marginal. Targeted action is a key component in the EU’s three-pronged approach to achieving gender equality, and is essential as a complement to the mainstreaming of gender perspectives. We believe that the EU must have a specific commitment to targeted action and recommend the EU to ensure that 20% of all new programmes score Gender marker 2 (gender as a principle objective). This target would count towards the overall target of 85% for G1 and G2.

**Sufficient funding for SRHR and FP**

Under the MFF 2014-2020, the DCI includes only one earmarked objective for Family Planning and Sexual and Reproductive Health (FP/SRH). This line remained unserved in 2014 and 2015, benefitting only from one funding decision in 2016. Although the EC is a key donor for Reproductive Maternal Newborn and Child Health and FP in absolute terms, these sectors represent a very small share of its overall ODA (only 0.25%), which puts the EU institutions as the 22th out of 29 OECD DAC donors. In the light of the new commitments of the EU to SRHR – Gender Action Plan 2016-2020, Agenda 2030, and Council Conclusions of May 2015 on Gender in Development – it is critical to review the level of investment.

**Integrating a gender perspective in all sectors**

During the previous budget period for the EU institutions, three quarters of all support to increase gender equality went to just three sectors - government and civil society, health and population policies/programmes and reproductive health. These sectors are fundamental for gender equality. However, it is essential that the EU increases action in other sectors as well. This implies that consultation on how to advance gender equality include not just women’s organisations but also stakeholders from all sectors. Consultations and analyses should also take in an intersectional perspective of women and girls that experience multiple discriminations, in line with the “leave no one behind principle” in Agenda 2030.

**Consistency in reporting**

The OECD DAC recently developed a new handbook for donors on gender equality reporting. In addition to clarifying on the use of G-markers, it also encourages donors to use specific codes to report on aid to women’s equality organizations as well as aid to violence against women. We encourage the EU to be consistent in using these codes in all reporting to the OECD DAC.

**Recommendations**

- Ensure that 85% of all new programmes under heading 4 score G 1 or G 2 as a result of the MTR, as committed to in GAP II.
- Ensure that 20% of all programmes under heading 4 score G2, gender as a principle objective, as a result of the MTR.
- Increase the budget in the GPGC programme of the DCI for gender equality from the current 1.5% to at least 20%.
- Ensure sufficient funding for SRHR and FP to deliver on Agenda 2030 and GAP II commitments.
- Ensure that all EU programmes in all sectors under heading 4 includes mainstreaming and targeted action for gender equality.
- Ensure that consultations and analyses take multiple discriminations into account in order to “leave no one behind”.
- Use disaggregated data on gender for all EU funded programmes.
- Be consistent in use of G-markers and specific codes in all reporting to the OECD DAC.