

CONCORD's views and recommendations for the NDICI Trilogue

This document presents CONCORD's views and recommendations for the trilogue negotiations on the Neighborhood, Development and International Cooperation Instrument (NDICI). It has been developed as a summary accompanying CONCORD's documents on Clusters for the NDICI Trilogue negotiations which CONCORD will release in coming months.

Agenda 2030, sustainable development, poverty eradication, development effectiveness principles

The EU has a responsibility to make sure that its budget for development cooperation follows its international commitments, namely the Agenda 2030, the Paris Agreement and the Busan Partnership for effective development cooperation. Sustainable development, poverty eradication and a human rights-based approach should thus be at the core of NDICI. Therefore we strongly recommend to include:

- “poverty eradication and sustainable development” in the general objective of the programme in the first recital and references to sustainable development, poverty eradication and human rights in the specific objectives;
- references to Article 208 TFEU which states that the Union development cooperation policy shall have the eradication of poverty as its primary objective;
- re-introducing a reference to SDGs in the objectives of the thematic programmes.

Balance around LDCs and MICs

Criteria for allocation of funds between regions and countries must be fair, objective and reflect the multidimensional causes of poverty and inequality. Allocation should not be dependent on migration deals with the EU, and there should be no diversion of finance from poor countries and regions to the migrants' countries of origin, or of transit to Europe, on the sole basis that they are on the migration route.

Targets

Ambitious targets in the NDICI can be powerful tools to steer investments in critical areas such as climate and environment, human development and gender equality, while fostering integrated approaches in the spirit of achieving the SDGs. We are proposing a specific set of relevant targets that would ensure safeguarding sustainable development objectives that have a direct impact on the lives of people. The targets proposed are of different nature and are complementary to one another in their implementation: some of them refer to funding targets while others are to be operationalised when setting programmes.

To ensure implementation, these targets should be included in the articles - preferably under Article 3 - so that they are legally binding and the EU can be held accountable for delivering on them. For example, OECD DAC recently reported that the EU only spent 11% of EU ODA on human development and social inclusion which is far below the 20% benchmark agreed in the Consensus on Development.

These targets can support the EU meeting its international commitments as well as supporting partners countries reach their own commitments under the Paris Agreement, the Agenda 2030 and other multilateral agreements. They are important to track if strategic goals are being achieved, for accountability, and to assess impact.

- **Climate & Environment**

We urge the Council to adopt a more ambitious and comprehensive 50 % target for climate and environment relevant actions in the NDICI regulation to address both climate change and environmental degradation globally, as two urgent and interlinked challenges underpinning sustainable development. Such a target should be seen as a key tool to incentivize investments that can contribute to fight climate change and environmental degradation while at the same time delivering results and benefits across a range of sectors.

We welcome the provision of aligning the NDICI with the Paris Agreement objectives. Beyond targeted expenditure in both emission reduction and climate change adaptation, as well as biodiversity, it is important that climate change and environment considerations are effectively mainstreamed throughout the NDICI and no public funding is spent on actions that cause harm to the environment, contribute to carbon emissions and promote further carbon lock-in for societies and economies around the world. Therefore, we further recommend to exclude fossil fuels related investments or any investment that cause harm to the environment or contribute to carbon emissions according to strict environmental screenings, which take into account any social or HR potential impacts.

- **Gender equality**

We support the inclusion of the commitment made by the EU in the GAP II that at least 85% of ODA-funded programmes should have gender equality as a significant or principal objective (OECD Gender marker 1 or 2). However, in order to ensure gender equality will be effectively operationalised throughout the NDICI, this commitment should be included in the Articles of the NDICI, preferably under Article 3 as proposed by the European Parliament. Additionally, we urge the EU to commit to allocate 20% of these funds to programmes having gender equality as a principal objective (G2). Gender mainstreaming needs to be complemented by investing in gender specific actions that can leverage the impacts on the lives of women and girls. By doing so, the EU investment in gender equality can have a stronger impact and visibility: making the EU a true champion on it.

Regarding the EU political commitments to gender equality and especially to sexual and reproductive health and rights (SRHR), it will be crucial to keep the reference to SRHR in Article 8, where the European Consensus on Development language on SRHR has been included by the Council of the EU. It will also be of utmost importance to safeguard the reference to SRHR in the annexes, as well as the mainstreaming of SRHR in all relevant sectors (including health, education, gender equality), as done by the European Parliament.

- **Human development**

The commitment to 20 % for human development and social inclusion is part of the European Consensus for Development. We recommend to include ring-fencing for these areas in the text of article 3 (Objectives), with specific references to health, education, nutrition and social protection with an emphasis on the most marginalised including women and children, to ensure enforceability and accountability.

Migration

Migration is a recurring issue throughout the Commission's proposal for the NDICI regulation. We recommend that the NDICI is primarily a sustainable development instrument that also addresses migration and forced displacement related topics with a development approach, acknowledges the human rights and vulnerabilities of persons on the move, regardless of their status, and puts emphasis on the rights and needs of protection of persons under international law.

See the [CONCORD Recommendations on the NDICI migration spending target](#) for more detailed recommendations.

Civil society, civic space

The NDICI does not sufficiently reflect the strategic and diverse role of civil society in development cooperation and democratic processes, which is recognised in the Council Conclusions - The roots of Democracy and sustainable development: Europe's engagement with Civil Society in external relations from 2012 and in the European Consensus on Development from 2017. We recommend to strengthen language as suggested below to:

- recognize the critical and worsened situation of shrinking space for civil society actors as a major global challenge. A mention to shrinking space for civil society should be included in the recitals, as it sets the framework for NDICI;
- recognize the diversity, and multiple roles, of civil society in development cooperation and democratic processes and the importance of civil society to be involved in all phases of the programming cycle of EU's development cooperation (design, implementation, evaluation, etc.) in line with a rights based approach;
- A role must be envisaged for civil society in political dialogue as well as in programming, across all pillars of the NDICI. In line with the Council Conclusions on the roots of Democracy and sustainable development: Europe's engagement with Civil Society in external relations, country programmes should ensure support to civil society organisations by including specific envelopes for civil society support. Moreover, with the geographization of the development cooperation under the NDICI proposal, safeguarding a role for civil society in the geographic programmes is of key importance.

Rapid response pillar

We welcome the flexibility brought by the Rapid response pillar. Operational flexibility is very much needed to serve crisis-affected populations and when conditions in partner countries, in particular fragile and least developed countries, change due to conflict or disaster. However, flexibility should not be used to cater for changing political priorities in Europe.

It is crucial that the Rapid response pillar preserves its main objectives, which are peacebuilding, conflict prevention and ensuring the EU capacity to implement the humanitarian-development-peace nexus in cases where it cannot be foreseen in programming. It should not become a mean to allocate more funding to migration related

activities or serve EU foreign policy priorities and visibility and communication purposes that should be covered under the Global Challenges thematic programme.

EFSD+

As the NDICI proposal reflects the intention to increasingly rely on guarantees and blending as a modality of cooperation in future geographic programmes, it would also be fundamental to clarify the maximum amounts respectively earmarked for guarantees and for blending as suggested by the EP.

Beyond the concerns related to the quantity of funds, we would also like to raise our concern on the approach behind the EFSD. Indeed, we think that crowding-in additional resources from the private sector must respond to clear and binding accountability and transparency rules, in order to continuously assess the development impact (positive and negative) and added value to development cooperation policies; otherwise, the risk of seeing subsidies going to international companies under the guise of contributing to the implementation of Sustainable Development Goals (SDGs) is very high. This may lead to market distortion and further cement corporate power in countries where the democratic space is already dangerously shrinking.

See the [CONCORD-Eurodad 10 areas to consider on the EFSD+](#) for our more detailed recommendations on these issues.

NATIONAL PLATFORMS	Global Responsibility	BELGISCH PLATFORM PLATE-FORME BELGE CONCORD CNCD-11.11.11 11.11.11 AGOCOV Hrvatska Federacija	BPID Bulgarian Platform for International Development	Platforma za međunarodnu građansku solidarnost Hrvatske Croatian Platform for International Citizen Solidarity CROSOL	CYINDEP Cyprus Island wide NGO Development Platform	FORS
GLOBAL FOCUS Danish CSOs for Development Cooperation	AKÜ	fingo	COORDINATION SUD	VENRO ASSOCIATION OF GERMAN DEVELOPMENT AND HUMANITARIAN AID NGOS	Hellenic Platform for Development	HAND
Dochas The Irish Association of Non-Governmental Development Organisations	Network delle ONG in Europa per lo sviluppo e l'emergenza CONCORD ITALIA	LAPAS WWW.LAPAS.LV	Lithuanian National Non-Governmental Development Cooperation Organisations' Platform LITDEA	Cercle de coopération des ONGD DU LUXEMBOURG	SKOP Solidarjeta u Koperazjoni	PAR TOS
ZAGRANICA	ONGD PLATAFORMA PORTUGUESA	FOND Federacija Organizacija za Negovarenje partnerstva, Desetina za Ruzdica	MVRO Platforma mimovládnych dobrovoľných organizácií Slováck NGDO Platform	SLOGA SLOVENIAN GLOBAL ACTION	COORDINADORA DE ORGANIZACIONES DE COOPERACION PARA EL DESARROLLO ESPAÑA	CONCORD SWEDEN
bond	NETWORKS	actalliance eu formerly APODEV	act:onaid	ADRA	care	caritas europa
cbm together we can do more	ChildFund Alliance	CIDSE together for global justice	euCORD European Charitable Organizations for Relief and Development	GNDR Global Network of Civil Society Organizations for Disaster Reduction	Habitat for Humanity Europe, Middle East and Africa	humanity & inclusion
IPPF International Planned Parenthood Federation European Network	ISLAMIC RELIEF	LIGHT FOR THE WORLD	OXFAM International	PLAN INTERNATIONAL	Save the Children	Sightsavers
solidar	SOS CHILDREN'S VILLAGES INTERNATIONAL	Terre des Hommes International Federation	wecf	World Vision	WWF	ASSOCIATE MEMBERS
ALDA European Association for Local Democracy	ea ea EUROPEAN ASSOCIATION FOR THE EDUCATION OF ADULTS	EUROPEAN PARTNERSHIP FOR DEMOCRACY	NRC NORWEGIAN REFUGEE COUNCIL			