EVALUATION OF THE EUROPEAN UNION EXTERNAL ACTION

INSTRUMENTS EVALUATION

EUROPEAN UNION’S EXTERNAL FINANCING INSTRUMENTS (2014-2020 AND 2021-2027)

Annexes
March 2024
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FWC EVA 2020
EuropeAid / 140122 / DH / SER / MULTI
Specific Contract EVA-2020-14854 (N° 300053700)

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EU International Partnerships:
European Union’s External Financing Instruments
(2014-2020 and 2021-2027)

Instruments Evaluation Report

The report consists of two volumes:

VOLUME I: SYNTHESIS REPORT
1. Introduction and background information
2. Methodology and limitations
3. Findings
4. Overall assessment and key lessons learned
5. Conclusions and potential ways forward

VOLUME II: ANNEXES
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3. Annex 3 – Overview of consultations
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Annex 1 – Evidence matrix

This Annex presents an overview of the evidence underpinning the findings, including an overview of the main sources used per JC. In addition the quality of evidence for each finding is presented using a three-level scale as summarised below.

<table>
<thead>
<tr>
<th>Quality of evidence</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>(strong)</td>
<td>The findings are consistently supported by a range of evidence sources, or evidence sources, while not comprehensive, are of high quality and reliable to draw robust findings.</td>
</tr>
<tr>
<td>(medium)</td>
<td>There are at least two different sources of evidence with good triangulation, but the coverage of the evidence is not complete.</td>
</tr>
<tr>
<td>(low)</td>
<td>There is no triangulation and / or evidence is limited to a single source.</td>
</tr>
</tbody>
</table>

EQ1 – Responsiveness to EU and partner countries’ policy priorities (incl. overall relevance and coherence)

JC 1.1 EFIs are coherent with EU policy framework, and related programming and other measures are aligned with objectives / priorities set in the regulations

The analysis under this JC has strongly relied on documentary sources. Interviews, targeted consultations and surveys have allowed to confirm and enrich the findings emerging from document review. The main sources used are summarised in the table below.

Table 2 Main sources of evidence for JC 1.1

<table>
<thead>
<tr>
<th>Main sources – documents</th>
<th>Main sources – surveys</th>
<th>Main sources – interviews &amp; targeted consultations</th>
<th>Other sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>• EFI regulations &amp; programming guidelines, e.g., NDICI-GE Regulation; IPA III Regulation and Programming Framework</td>
<td>• EUD written contributions</td>
<td>• Interviews: EU HQ, EUDs, in-country stakeholders</td>
<td></td>
</tr>
<tr>
<td>• EFI-level reporting and previous EFI evaluations</td>
<td>• In-country stakeholder survey</td>
<td></td>
<td></td>
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<tr>
<td>• Strategic evaluations (thematic, country, regional)</td>
<td>• Validation survey</td>
<td></td>
<td></td>
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<tr>
<td>• Strategic programming docs (MIPs, SRs) and AAPs</td>
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<tr>
<td>• Other (e.g., think tank reports)</td>
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</tbody>
</table>

Finding 1 The EFI regulations set out a comprehensive broad cooperation framework which is coherent with the EU policies and international commitments.

Related indicator(s) in the Evaluation Matrix: I-1.1.1, I-1.1.2, I-1.1.3

Quality of evidence

Alignment with the EU policy framework

Document review shows the following:

- The NDICI-GE Regulation reflects the view that greater weight should be put on the EU policies, priorities, and interests. Recital 1 states that the financing instrument, as translated into the MFF 2021-2027 and thence via the MIP 2021-2027 to country, regional, and global programming, will promote the Union’s values, principles and fundamental interests worldwide as called for in Article 3(5) and...
Articles 8 and 21 of the Treaty on European Union (TEU). The NDICI-GE Regulation's overarching objective is ‘to uphold and promote EU values, principles, and fundamental interests worldwide (1).’

- The Regulation also aligns with the EU Global Strategy (2016), which called for a more vigorous external action driven by EU values and interests to build a stronger Europe (2). The Global Challenges Multiannual Indicative Programme (MIP) 2021-2027 makes this explicit: ‘EU is reviewing its policies in order to strengthen its strategic influence and prominence. The EU will be more assertive, defending its interests and values at global level while building and reinforcing coalitions with partners on key priorities.’

- Several objectives of the New European Consensus converge with EFSD+ priorities – for instance, job creation and resilience under the key theme ‘People’, sustainable energy under ‘Planet’, the involvement of the private sector in sustainable development under ‘Prosperity’, the focus on situations of fragility under ‘Peace.’ Under ‘Working better together’, the new Consensus also underscores the role that Blending can play in implementing the 2030 Agenda and indicates that: ‘Close partnership with the European Investment Bank (EIB) and other Member States’ financial institutions will be a key feature of EU blending activities (3).’

- Recital 13 of the NDICI-GE Regulation makes explicit reference to the EU Strategic Framework on Human Rights and Democracy.

- The term ‘civil society’ appears a total of 79 times in the NDICI-GE Regulation. Recitals 11, 28, 38, 42 and 46 (4) delineate specific priorities for CSOs: promoting an enabling environment, strengthening their voice in national and international policy making, strengthening their capacity as independent development and governance actors (which would include the monitoring and watchdog roles).

- The Regulation puts emphasis on environment and climate change, which is consistent with the European Green Deal adopted in 2019 (5).

- The objectives and priorities on peace and security set in the NDICI-GE are coherent with, e.g., the Global Strategy (2016), the New European Consensus on Development’ (2017), ‘A Union that strives for more’ (2019) or Joint Communication on ‘Strengthening the EU’s contribution to rules-based multilateralism.’

- There is no contradiction between the Regulation and other EU priorities agreed after the adoption of the NDICI-GE-GE regulatory framework, such as the Global Gateway adopted in 2021.

- The Regulation aligns EU support with the pursuit of a rules-based and values-based global order, emphasising multilateralism and cooperation with the UN. In this context, key international agreements, including the 2030 Agenda for Sustainable Development, the Paris Agreement on Climate Change, the Addis Ababa Action Agenda as well as the European Consensus on Development constitute the overall framework for the implementation of NDICI-GE.

- The NDICI-GE Regulation establishes broad areas of cooperation for the Neighbourhood (6) often corresponding to specific EU policies mentioned in the Regulation and allowing the EU to engage in diverse fields of cooperation and partnership such as governance, migration, environment, socioeconomic development, and peace and conflict prevention. In contrast, the ENI Regulation only mentioned EU values and interests in relation to outreach activities (7).

- In relation to the cooperation with sub-Saharan Africa, The Joint Communication ‘Towards a comprehensive strategy with Africa’ (2020), the post-Cotonou partnership agreement (2021, adopted by EU Council in 2023), the 6th EU-AU Summit Joint Declaration (Brussels, February 2022) and the Global Gateway Africa-Europe Investment Package all share similar priorities.

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(2) EU, Regulation (EU) 2021 / 947 establishing the NDICI-GE, 2021. Recital (11). The EU Global Strategy identifies five priorities for the Union's foreign and security policy, including ensuring the security of the Union, enhancing the resilience of neighbouring states, adopting an integrated approach to conflicts and crises, promoting cooperative regional orders, and advocating for global governance and multilateralism. These priorities guide the EU's efforts to address challenges, foster stability, and advance its values and interests on the global stage. EU, Shared Vision, Common Action: A stronger Europe, A Global Strategy for the EU's Foreign and Security Policy, 2016.
(6) The objectives and priorities for the Neighbourhood area are defined in several sections; in addition to specific objectives for the Neighbourhood area outlined in the main Regulation and the priorities for all geographic programmes under the 5 Ps., the Delegated Regulation set specific priorities for the Neighbourhood East and Neighbourhood South derived from the two Joint Communications.
• In the former DCI regions, the review of MIPs shows that EU support is embedded in the policy priorities of the EC (1).

• The 2017 MTE (2) criticised the EU for increasingly using the 11th EDF for priorities not foreseen in the Cotonou regulations. In response (3), the EU alluded to the emerging Policy first approach, by stating ‘some external evaluations mention tendencies towards predominantly EU driven agendas during the programming. […] This apparent trade-off between EU interests / international values and partnership principles should be seen within the new policy context of the universally agreed 2030 Agenda / SDGs.’

Consultations with stakeholders further highlight:
• Interviews with all stakeholder groups largely confirm the strong alignment observed above.
• A majority of respondents to the validation survey gave a positive answer regarding the statement: ‘Activities of financial institutions in the context of EFSD+ are aligned with EU policy priorities.’
• As evidenced from contributions to the OPC and targeted consultations, the discordance between the NDICI-GE and post-Cotonou spirits has given rise to concerns from the OACP Secretariat and its member states that the EU is not following through its commitments.

Alignment of IPA III, INSC and DOAG:
Document review shows the following:
• The IPA III Regulation (11) states: ‘The objective of an instrument for pre-accession assistance is to prepare the beneficiaries for future membership of the EU’, meaning that the candidate countries / beneficiaries are expected to use IPA III to further their abidance by accession criteria.
• The INSC II objectives and activities were assessed as fully relevant to EU and partners’ policies, priorities and needs in the final evaluation of INSC II (2014-2020) (12).
• The new INSC instrument places greater emphasis than INSC II on promoting transparency of decision-making processes of the authorities in third countries and on cooperation with EU acceding countries, candidate countries, potential candidates, and European Neighbourhood Policy countries. These focus areas are indicative of the political nature of the instrument, i.e., of its purpose to serve EU external policy objectives.
• The INSC’s emphasis on good governance, transparency and international cooperation in the nuclear sector are fully aligned with the fundamental values and principles of the EU, as embodied in the Copenhagen criteria and the ‘fundamentals first’ approach (13).
• DOAG aligns itself with the global EU agenda by explicitly referencing key frameworks like the SDGs, the Paris Agreement, and the Addis Ababa Action Agenda. It places a strong emphasis on inclusivity, interconnected objectives, and places a notable focus on gender equality and women’s empowerment (14).

Consultations with stakeholders further highlight:
• Interviewees in EU headquarters emphasised that IPA III is fully aligned with the priorities of the Enlargement policy.
• Summarising the views of various EU interviewees in Headquarters and EUDs, an EU interviewee stated that ‘the Enlargement region is not a development context, where EU has to align with the countries. This is an Enlargement context where, to be accession-ready, countries have to align with EU values and priorities.’

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While many issues of prioritisation lie at the level of how instruments are implemented, some are structural and reside at Regulation level.

### Clarity of concepts and prioritisation at Regulation level

Document review shows the following:

- The NDICI-GE and IPA Regulations and the guidance documents related to specific frameworks such as EFSD+ present a long list of policy priorities leaving significant space to actors involved in programming to decide on what the most important priorities in EU external cooperation should be. An analysis of the NDICI-GE Delegated Regulation (15) highlights some regional specificities (e.g., emphasis on peace and security in regions such as West Africa, emphasis on digitalisation in the Americas), but a majority of themes is common across regions.

- The review of 18 NDICI-GE MIPs covering the sample countries of the evaluation (16) indicates that bilateral programming consistently covers a wide range of thematic areas with systematically at least one area in each of the three macro sectors structuring EU external action: i) Green Deal, ii) Governance, and iii) Human Development. While the review of MIPs points to an overall stronger focus on Climate change / Environment and on Education compared to the previous MFF, there is no evidence showing that this reflects a prioritisation set in the instrument itself.

- The EU identified six strategic investment areas to be supported by EFSD+ Guarantees building on three EU overarching sets of priorities: i) the European Green Deal launched in 2019; and ii) the Global Gateway (17) adopted in 2021; and iii) EU policy priorities related to Jobs and inclusive growth (see Annex III of the NDICI-GE Regulation). The review of selected project documents shows that, while the sector focus of EFSD+ interventions appear coherent with EU policy priorities, it covers a very broad range of areas with no clear rationale regarding the weight given to the various sectors (18).

- Comparing priority areas identified under the Global Public Goods and Challenges thematic instrument (2014-2020) and the Global Challenges thematic programme under NDICI-GE, all priority areas have been carried over and new ones (e.g., Youth and People with Disabilities) have been added.

- IPA III foresees performance-based, continuous programming, to reward progress on EU policy-oriented reforms, e.g., as stated in the 2021 Brdo Declaration (19): ‘the EU reconfirms its commitment to the Enlargement process and its decisions taken thereon, based upon credible reforms by partners, fair and rigorous conditionality and the principle of own merits. EU support will continue to be linked to tangible progress on the rule of law and socio-economic reforms, as well as to partners’ adherence to European values, rules and standards.’ The IPA III Regulation, Article 8 (3) (20) describes the performance-based approach: ‘Assistance shall be differentiated in scope and intensity according to performance of the beneficiaries listed in Annex I, in particular as regards their commitment to and progress in implementing reforms, as well as according to their needs.’ The Regulation (Annex IV) lists 11 Performance Indicators, including a composite indicator on political criteria closely corresponding to the fundamentals. However, the Regulation does not further specify how performance should be assessed during actual programming.

- The previous regulations did not clearly delineate human rights and democracy, often addressing them as a continuum, which according to several interviewees led to the primacy of human rights (better defined in EU and international law) over democracy. Following this realisation as noted in thematic evaluations (21), and observing global threats to democracy, the NDICI-GE Regulation (Art.

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(16) The reviewed MIPs include: Chad; Kenya; Somalia; Madagascar; Senegal; Iraq; Nepal; Tajikistan; Haiti; Papua New Guinea; Honduras; Moldova; Ukraine; Egypt; Jordan; Morocco; Greenland; Saba.


(18) Reviewed project documentation includes EFSD blending and guarantees as well as EFSD+ blend and guarantees documents. Documents were reviewed for several interventions across the EFSD and EFSD+ portfolio. A selection of reviewed project documents is listed hereafter. EFSD blending: SUNREF Palestine (C-393856, with AfDB), Projet de la Dorsale Transsaharienne à fibre optique (DTS) (C-397340, with AfDB); EFSD guarantees: FMO NASIRA (with FMO), EFSD Municipal, Infrastructure and Industrial Resilience Programme (with EBRD); EFSD+ blending: Eco-business Fund for sub-Saharan Africa (C-427303, with KfW); EFSD+ guarantees: Better Futures Programme (with IFC).


3) clarifies these definitions. Nevertheless, as pointed in the recent ECDPM (2022) (22) and IDEA International reports (2023) (23), these two thematic areas could benefit from a more autonomous narrative about the understanding and the vision of democracy by the EU.

Consultations with stakeholders further highlight:

- Several interviewees highlighted the very broad framework established by the regulations and the main EU policy documents, which leaves significant space for actors involved in programming to interpret what the most important priorities in EU external cooperation are.
- Interviews with EUDs and headquarters (EEAS and line DGs), as well as EUD written contributions reveal differences in interpreting how performance should be assessed for the performance based approach under IPA III and demand further clarification.
- As interviewees in IPA beneficiaries pointed out, almost any bilateral action could be formulated to qualify as contributing to the ‘Fundamentals.’ Given the lack of substantial EU acquis on some of them as highlighted in Enlargement progress reports (24) and internal assessments (25), and a wide variety of potential models, these areas pose particular challenges for the EU to assess the accession candidates’ standards. This has prompted thematic units to further research and develop the framework of European standards.

**JC 1.2 Strategic focus of EU programming and non-programmable actions in line with the Policy first approach**

The analysis under this JC has relied on a variety of sources of information. In addition to the documentary review, the analysis built on the mapping of EU spending actions as well as interviews, targeted consultations and surveys. The main sources used are summarised in the table below.

<table>
<thead>
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<td>EUD written contributions</td>
<td>Interviews: EU HQ, EUDs, IOs and international CSOs, in-country stakeholders (authorities, CSOs), European Development Financial Institutions / IFIs and EU Member States (HQ, local representatives)</td>
<td>Mapping of EU spending actions</td>
</tr>
<tr>
<td>EFI-level reporting and previous EFI evaluations</td>
<td>In-country stakeholder survey</td>
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<tr>
<td>EU sector guidelines and thematic guidance notes and templates</td>
<td>Validation survey</td>
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<tr>
<td>Strategic evaluations (thematic, country, regional)</td>
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<td>Other (e.g., think tank reports)</td>
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</table>


(24) One example, among many others, may illustrate this fact: the 2022 North Macedonia 2022 Report (EC, North Macedonia 2022 Report accompanying Communication on EU Enlargement policy, Commission SWD(2022) 337 Final, 2022) points to the need to comprehensively review the legislation related to elections to ‘address inconsistencies’ and ‘improve the electoral Process’, but in the absence of explicit EU acquis, the report refers to OSCE / ODIHR and CoE Venice Commission recommendations.

Finding 3  Programming documents are more policy-driven and in line with the objectives and priorities set in the relevant regulations and EU goals in the relevant geographical regions.

<table>
<thead>
<tr>
<th>Related indicator(s): I-1.2.1, I-1.2.3, I-1.2.5</th>
<th>Quality of evidence</th>
</tr>
</thead>
</table>

Alignment of programming documents

Document review shows the following:

- All MIPs reviewed include priorities such as green transition, good governance, economic and social resilience. Several of them include priorities related to education, digital transformation and migration. (see also JC 1.1)

- A recent European Court of Auditors’ report (26) reached a similar conclusion ‘MIP priorities were also well aligned with the Commission priorities for the EU’s international partnerships (Green Deal, digital transformation and data technologies, alliances for sustainable growth and decent jobs, better management and governance of migration, migration partnerships, and governance, peace and security).’

- The MIPs also reflect the greater importance granted to EU values in the Regulation, with most programmes including priorities to promote human rights and fundamental freedoms, gender equality and empowerment of women as well as good governance and the rule of law (27).

- The language found in the country MIPs in sub-Saharan Africa shows good considerations to NDICI-GE Programming Principles starting with the Policy first approach. Reflecting the different country contexts, this shift to the ‘beyond aid’ agenda comes more strongly in some countries than others. For example, in Kenya, the country MIP states that ‘the partnership between Kenya, the EU and its Member States is progressively transforming beyond development cooperation into a relationship based on common values and mutual interests.’

- With an element of retro-fitting (28), the overarching objective of the NDICI-GE Regulation – which is to ‘uphold and promote the Union’s values, principles and fundamental interests worldwide (29).’ and those of framing EU’s engagement in Africa have become more coherent over the years. The Joint Communication ‘Towards a comprehensive strategy with Africa’ (2020) (30), post-Cotonou partnership agreement (2021, adopted by EU Council in 2023) (31), the 6th EU-AU Summit Joint Declaration (Brussels, February 2022) (32) and the Global Gateway Africa-Europe Investment Package (33) all share similar priorities. It is nonetheless worth noting that only the post-Cotonou agreement retains poverty eradication and the achievement of the Sustainable Development Goals (SDGs) as its overarching objective.

- Launched by the EC in 2021, the Economic and Investment Plans (EIPs) outline a set of indicative and non-exhaustive list of flagship investments identified by the EU in collaboration with partner countries and targeting major infrastructure projects in water and sanitation, transport, energy, agriculture and the environment, as well as financing for SMEs, digitalisation, education and human development.

- In the former DCI region (Asia, Pacific and Latin America), the Policy first approach and EU interests were already guiding principles during 2014-2020 but are clearly more explicitly articulated under NDICI-GE. MIPs and RIPs for 2021-2027 are policy-driven and explicitly and comprehensively link the cooperation strategies with the respective countries and regions to the policy priorities of the European Commission for 2019-2024.

- The EUD written contributions and interviews show that the idea of the Policy first approach is generally well understood: shared policies and political priorities between the EU, EU Member States and partner countries should guide the EU’s external cooperation and development cooperation, as opposed to former approaches more driven by the legal and administrative aspects of EDFs rather than policy. Equally, the EUD written contributions and interviews highlight the importance of aligning policies, addressing priorities, and coordinating efforts with EU actors (Member States, development

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(28) All exercises, in particular NDICI-GE, post-Cotonou negotiations, the regional MIP programming, and the preparations of the EU-AU summit, were carried out at around the same time.
banks) and partner countries to achieve desired outcomes and impact in various sectors of cooperation.

- In line with the Joint Communication ‘Enhancing the accession process – A Credible EU perspective of the Western Balkans’ (34) and as presented by EU interviewees and NIPACs, the essence of IPA III is to create a virtuous cycle, by motivating the beneficiaries to reinforce their reform efforts with a view to receiving more support, and to use the support received for further boosting these reforms. Serving this ambition are the performance-based approach and modulation. The Fair Share principle, focussed on the respective needs and capacities of IPA III beneficiaries, regardless of where they stand on the accession process, balances the possible negative equity consequences of the performance-based approach, ensuring that a disproportionately low level of assistance (in comparison to other IPA beneficiaries) can be avoided (35). However, the Regulation does not define how much is ‘fair’ nor how to calculate it.

- Action documents of the Foreign Policy Needs component of the Rapid Response Pillar (RR-FPN) that were reviewed include public diplomacy components and aim at engaging effectively with target audiences to build trust, enhance the understanding of the EU as ‘a strong and attractive global partner’ and advance policy priorities, in line with a ‘Stronger Europe in the World.’

Consultations with stakeholders further highlight:

- The regional sub-Saharan Africa MIP was drafted with the ambition to build on country programmes, fund actions that demonstrate a clear added-value to address an issue from a regional perspective, and, link up with global initiatives. Yet, according to interviews with DG INTPA and EUD written contributions, because of time pressure and the significant size of the budget, the regional MIP and first round of regional decisions were put together by HQ. While timing was a huge constraint (country and regional MIP were drafted in parallel), this missed opportunity can also be traced back to budgetary decisions (36).

- As confirmed during the interviews with EU staff at HQ, the focus of attention in SSA was primarily on how to split the funding between geographic and thematic programmes, rather than between bilateral and regional initiatives. Initial expectations (from some EUDs) were that, with the Geographisation principle, the country envelopes would increase and the regional envelopes decrease, an expectation not met (37). This placed some EUDs in the difficult position of retro-managing downward the expectations of their partners.

- A theme that emerges from interviews with EUD officials, particularly in the Asia and Pacific regions, is that development cooperation must increasingly align with political strategic directions and multi-year programming does not readily facilitate rapid alignment. While there is a participatory process with partners and extensive discussions about programming, it is a time-consuming endeavour. Once a programme is finalised, it becomes very challenging to adapt, even in the face of shifting political circumstances.

- According to a wide range of stakeholder interviews, there is no real strategic multiannual bilateral programming process beside the AAPs in the Enlargement region: in the absence of high-quality, mutually agreed Strategic Response, annual programming and day-by-day decision making prevail (38).

- Several interviewees (EUDs, beneficiaries, CSOs) have argued that the annual bilateral programming dynamic observed in the Enlargement region is not in line with the strategic intention of IPA III.

- Interviews with EC stakeholders, CSOs, and some NIPACs show that the first 2021 / 2022 programming exercise has been a challenging process: Strategic Responses were lengthy and laborious to produce (39). A close review has shown that they lack strategic vision or purpose, do not clearly prioritise among sectors, and often resemble an aggregation of Sector Planning Documents (which were in use under IPA II).

- Interviews with the EUDs and headquarters, as well as with CSOs and NIPACs show that, despite sometimes considerable efforts invested by the NIPACs, the inputs by the line ministries and at times the NIPACs’ capacity to translate them into strategic synthesis account for these shortfalls.

- Several interviewees from EUDs and NIPACs also state that the Strategic Responses ended up being used as a reference document rather than as a roadmap or programming tool.

(38) Source: EUDs and headquarter interviewees, CSOs NIPACs, Strategic Responses and AAPs 2021-2023 Kosovo*, North Macedonia, Serbia, Türkiye.
• EUD written contributions show that the programming tends to be dominated by EU interests and priorities in fragile countries lacking the capacity to articulate their own priorities.

• EUD written contributions show that the addition of the RR-FPN was seen as a positive development as in the previous MFF there was no tool fully dedicated to supporting EU foreign policy priorities globally in the short to medium term. They also revealed that the addition of a specific geographical envelope for high income countries (HICs) – not at instrument level but as delegated funds for HICs – under the NDICI-GE has rightly recognised the importance and potential leverage of cooperation with like-minded partners and economic leaders, especially in geographical and thematic areas where the EU seeks to assert its influence and leadership. EUDs however also noted that allocations for HICs appear to be low compared to their increased importance, limiting the capacity to respond and implement political strategies and flagship policies of the EU.

• EUD written contributions show that when it comes to the Policy first approach, little change was noticed with regards to HICs and the implementation of the RR-FPN, as FPI always placed policy at the core of all actions.

• In the validation survey, only 25 out of 60 EUDs outside the Neighbourhood and Enlargement regions strongly agreed or somewhat agreed that the current EFIs and underpinning Policy first approach have helped to strengthen the partnership with national governments. Only slightly more EUDs (28) thought that the current EFIs and their Policy first approach have helped to strengthen the strategic focus of EU programming.

Finding 4 With some exceptions, thematic programming is characterised by more continuity than change. The full programmatic impact of Geographisation – ensuring the inclusion of global thematic concerns at country and regional – is difficult to assess yet.

Global Challenges and mainstreaming of global thematic concerns

Document review shows the following:

• Global Challenges AAPs confirm that the EU is supporting a wide range of international initiatives through UN actors, multilateral development banks, and others

• Basing itself on the 2017 New European Consensus on Development, the GPGC MIP 2018-2020 (40) enumerated multiple EU strategic commitments and orientations, including the Strategic Approach to Resilience, the Gender Action Plan-II, EU Action Plans on Wildlife Trafficking and on Forest Law Enforcement Governance and Trade (FLEGT), the Biodiversity Strategic Plan 2020 under the Convention on Biological Diversity (CBD), the EU Circular Economy Action Plan, the European Agenda on Migration and the EU External Investment Plan (then aimed at Africa and the Neighbourhood). The Global Challenges MIP 2021-2027 (41), affirms its commitment to green and digital transformative shifts relevant to all areas of sustainable development and hence to all priority themes identified under the ‘4 Ps’ (People, Planet, Prosperity and Partnerships).

• Repeatedly appearing throughout the document is the EU commitment, in a world of new unlike-thinking actors and increasing tensions, to strengthening the rules-based multilateral approaches (42). An example of the EU’s drive for partnerships is Forest Law Enforcement, Governance and Trade (FLEGT).

• In the Neighbourhood East region, a total of 28 actions have been adopted under the regional MIP for the Eastern Neighbourhood 2021-2027. In line with the priorities identified in the regional MIP, the adopted actions cover a wide range of topic, including i) environmental and climate resilience, ii) civil society, democratic participation and gender equality, iii) private sector development and trade, iv) accountable institutions and rule of law, v) digital transformation, vi) transport and connectivity, vii) energy security, and viii) health and education.

• In the Neighbourhood South region, 10 actions have been adopted under the Multiannual indicative programme 2021-2027 through the multiannual action plans in favour of the Neighbourhood South region for 2021 to 2023. As in the Eastern partnership, the actions cover a wide range of topics in line with the priorities identified in the regional MIP, including i) green transition, ii) civil society and democratic participation, iii) economic recovery, iv) accountable institutions and security, v) maritime safety and vi) migration and mobility.


(42) EU, Joint Communication on Strengthening the EU’s contribution to rules-based multilateralism, JOIN(2021) 3 final, 2021.
• While many MIPs in sub-Saharan Africa address global challenges of interest to both the EU and partners, the regional MIPs are viewed as now the main vehicle for addressing thematic issues. Consultations with stakeholders further highlight:

• Feedback from the EUDs (via contributions and interviews) shows no fundamental change in their approach to programming as a result of Geographisation.

• Some counterparts in the partner countries, in particular in the Neighbourhood (as evidenced from interviews and the in-country stakeholder survey) are not aware of the Geographisation principle and have not noticed any difference between from the point of view of programming.

• In sub-Saharan Africa, feedback from EUDs is that is often easier to target global thematic concerns (e.g., gender) rather than mainstream them in broader actions. As a result mainstreaming of global thematic concerns has been stronger at regional than country level.

Finding 5 Human rights and democracy continue to be priorities, with CSOs and Local Authorities regarded as key actors.

<table>
<thead>
<tr>
<th>Related indicator(s): I-1.2.1, I-1.2.3</th>
<th>Quality of evidence</th>
</tr>
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</table>

Priority on human rights, democracy and civil society

Document review shows the following:

• The legal, policy, and regulatory bases of the EU’s external action under both successive MFFs recognise human rights and democracy as global and country-level priorities.

• The MIP 2021-2027 for the thematic programme on human rights and democracy streamlines the multiplicity of commitments and references to human rights and democracy.

• The high priority of democracy and human rights is also recognised in multiple recent evaluations..

• The NDICI-GE MIP on human rights and democracy addresses the human rights and democracy issues at all levels with five overarching priorities. The NDICI-GE Regulation envisages three main areas of work on civil society.

• As the only thematic programme with a clear actor-based mandate under NDICI-GE, the NDICI-GE CSO MIP 2021-2027 states that civil society under the current MFF should be mainstreamed through all geographic and thematic programmes of the Commission: this aims at strengthening CSOs as independent actors of good governance and development in their own right.

• The IPA III Regulation does not distinguish the specific objectives applicable to human rights, democracy and rule of law, but altogether, these three areas are served by numerous sub-objectives, such as promoting an independent judiciary or promoting compliance with international law.

• Based on an assessment of the NDICI-GE Regulation, there are no fundamental differences in nature between the previous and current approaches as regards human rights, democracy, and civil society – but differences of degree: under NDICI-GE, mainstreaming is expected to be stronger, and a key vehicle to address these thematic areas and actors.

Consultations with stakeholders further highlight:

• A survey to EUDs implemented in 2023 for the relevant INTPA thematic project under the technical assistance project to the thematic programme showed that 100 out of 103 EUDs had consulted with CSOs, chiefly for strategic programming purposes (towards the preparation of the MIP and in the framework of the Gender Action Plan III). However, country-level consultations rarely follow the Structured Dialogue approach promoted by DG DEVCO and DG NEAR initially, now by DG INTPA and NEAR in guidance documents and in their facilitation and coaching efforts towards CSO Focal...
Points in EUDs (49): only 4 % EUDs followed this approach, against 61 % following an ad hoc approach, and 35 % engaging in regular general dialogue once or twice a year.

- Based on the OPC, CSOs find it difficult to obtain funding because, in the interests of grant management efficiency, minimum grant thresholds are high, as are requirements for co-funding. The result is that EU civil society financing is tilted towards large, well-established, national NGOs. The practice of sub-contracting, in which international partners sub-contract to national NGOs, has only reinforced this tendency. In qualitative responses given to the OPC, CSO respondents stressed the contradiction between the recognised importance of CSOs and the related programming and funding under the NDICI-GE, as there is a perceived erosion in funding opportunities, and limited transparency in funding allocation. The most recurring theme was the perception of reduced and more difficult engagement options for civil society with EU cooperation in partner countries.

Finding 6 Under the thematic programme for Peace, Stability and Conflict Prevention (PSCP) and the Rapid Response Pillar (RRP), peace and security continue to be a priority, but this is a work in progress.

<table>
<thead>
<tr>
<th>Related indicator(s): I-1.2.1, I-1.2.3, I.1.2.4</th>
<th>Quality of evidence</th>
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<tbody>
<tr>
<td>Peace, security and crisis response</td>
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Document review shows the following:

- The review of MIPs (2021-2027) and IPA III Strategic Responses (2021-2024), EAMRs, AAPs and AOSD reports for 2021 and 2022 for Moldova, Jordan, Chad, Kenya, Tajikistan, Honduras, Kosovo* and Serbia reveals that in four out of these eight countries (4 / 8) peace and security is a priority. In the other countries aspects of peace and security are included in at least one other area of cooperation, such as rule of law, human rights, governance or natural resource management.
- Strategic as well as programming and reporting documents, such as EAMRs or the AOSD reports, display a mainstreaming of this attention to peace and security and thereby show full attention to the Policy first approach of NDICI-GE.
- While this attention to peace and security is positive, the European Court of Auditors report (2023) finds that the selected priority areas, including for the sectors of peace and security, were too broadly framed, thereby risking undermining the NDICI-GE’s policy focus and impact. This was also confirmed by INGO interlocutors.

Consultations with stakeholders further highlight:

- Several FPI interviewees noted, that when ‘peace and stability’ is not set as a priority in a country for the geographic partnership, Rapid Response actions risk being isolated interventions due to lack of possible continuity.

Finding 7 EFSD+ is coherent with the Policy first approach, but there are problems in translating it into MIPs, and persisting doubts regarding the approach adopted to cover difficult contexts.

<table>
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<tr>
<th>Related indicator(s): I-1.2.1, I-1.2.2</th>
<th>Quality of evidence</th>
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<tbody>
<tr>
<td>Coherence of the EFSD+ framework</td>
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Document review shows the following:

- EFSD+ aims to support investments and increase access to financing, as a means of contributing to the achievement of the objectives and general principles set out in the NDICI-GE Regulation, thereby contributing to the Policy first approach promoted under the current MFF. Internal EFSD+ guiding documents also emphasise the fact that EFSD+ funding should primarily be used to support investments such as those related to the Team Europe Initiatives as well as the main priorities identified in the policy dialogue with partner countries and reflected in key strategic documents, including MIPs.
- Internal guiding documents emphasise the need to link the programming of guarantees and blending support to geographic programming. Processes established to implement the EFSD+ allow to do so to some extent (50). The positive changes introduced in the transition from the EFSD to the EFSD+ are particularly visible in the EIB exclusive window on sovereign lending, which relies on a “three stage

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(49) E.g., Forum of EUDs Focal Points for Human Rights and Democracy, Civil Society, Youth and Gender Equality, March 2023.

approval’ process aimed at strengthening upstream coordination between the EC (incl. the geographic teams) and EIB.

While the EBRD already had a strong presence in the countries of operations (Neighbourhood and Enlargement regions, as well Central Asia and Mongolia), the EIB has also recently taken steps to build local capacity across the world. It has set up a branch dedicated to the Bank’s activities outside the EU, EIB Global, with a network of 30 local offices, 25 of which are co-located with the EUDs, and the creation of additional regional hubs to streamline the distribution of financing.

Consultations with stakeholders further highlight:

As highlighted in JC 1.1, a majority of respondents to the validation survey answered positively to the statement: ‘Activities of financial institutions in the context of EFSD+ are aligned with EU policy priorities.’

**Challenges and concerns related to EFSD+**

Document review and statistical analysis of financial flows show:

- EU guiding documents remain general regarding the weight to give to the different priorities pursued under EFSD+ and how decisions regarding trade-offs between the many priorities are to be made.
- In particular, as highlighted in recent studies (51) and according to interviews carried out by the Evaluation Team, this partially reflects the difficulties for DFIs / IFIs to engage in non-traditional areas; e.g., social sectors.
- Based on the Evaluation Team’s own analysis of data shared by DG NEAR and DG INTPA, under EFSD, EU-funding of blending operations focussed on: i) infrastructure development in the areas of energy and transport (67 %); and ii) support to MSMEs (12 %). 2 % of blending support (52) went to urban development projects with a strong social dimension and only 1 % to education (53). The repurposing of guarantees to address the COVID-19 crisis explains why social sectors account for a larger part of investments in the EFSD guarantee portfolio (29 %) than in EFSD blending operations.
- Based on the Evaluation Team’s own analysis, blending operations approved under the EFSD+ starting 2021 draw a similar picture, with an even increased focus on infrastructure: i) 64 % of approved amounts are supporting interventions related to infrastructure in the sectors of transport (48.17 %), energy (14.24 %) and Water and sanitation (11.91 %); ii) 8.65 % of funding is allocated to the support of MSME / Private Sector operations; and iii) less than 5 % go into operations related to human capital (3.17 %), Urban development (0.91 %) and the social sector (0.52 %).
- Based on the Evaluation Team’s own analysis, regarding guarantees, under the EIB Dedicated Windows, 44 % of approved operations are supporting infrastructure-oriented interventions under the header of Connectivity, i.e., in the Energy, Transport and Digital sectors. 28 % are supporting sustainable agriculture and biodiversity, and 10 % are supporting MSME and the private sector. In the OA, more than 60 % of funding is allocated to connectivity-related operations and private sector development, followed by 15 % in natural capital. In contrast, social sectors accounted for 5 %, 13 % and 11 % of the total approved blending operations, EIB Window 1 investments, and allocations under the OA window.
- Recent studies also show that DFIs / IFIs have different approaches and standards when it comes to mainstreaming human rights, gender and climate in their investments (54). They have their own complaint mechanisms, the standards of which differ from one financial institution to another (55).

Consultations with stakeholders further highlight:

- Interviews and responses to the surveys show that some EFSD+ supported interventions, both blending operations and guarantees, are still very much driven by DFIs / IFIs.
- Several EU Member States representatives highlight insufficient clarity regarding the attention to be given to the different EFSD+ objectives, hampering effective steering by the EFSD+ Strategic Board.
- In the Neighbourhood, the written contributions from the EUDs highlighted the challenge of using EFSD+ in fragile contexts. Lebanon is a case in point: there is currently no functioning banking system, and there are no incentives for IFIs to step in to address this market failure, where the EU guarantee could provide significant added value.
- Some EU staff interviewees also raised concerns regarding the difficulty to ensure policy monitoring at EU level when priorities are not clearly spelled out.

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(52) Two interventions by AFD with a focus on housing in Tunisia.
(53) Two interventions by KFW and EIB with a focus on infrastructure development related to higher education and TVET.
Finding 8: Mainstreaming and monitoring cross-cutting themes have proven difficult, both geographically and thematically.

**Related indicator(s): I-1.2.4**

**Implementation of markers and targets in geographic programmes**

Document and data review shows:

- According to a recent study (56), targets make it easier to monitor and report on progress in specific policy areas, but their large number poses flexibility and methodological challenges. The study found that while the EU appears to be on track to meet the targets on democracy, human rights and gender equality, these figures only tell part of the story.
- Recent strategic evaluations (57) found that the gender marker, despite guidance from DG INTPA, is not always well understood and applied by project staff a EUD level. While there is a strong incentive to achieve a Gender Marker 1 or 2 which projects are designed (in order to meet the target), there is a tendency for the gender aspect to be progressively diluted as the project moves downstream the programming process.
- For the former DCI region, the final report of the EU-PNG country strategy evaluation (58) notes that, if the attention given to cross-cutting issues becomes too prevalent, there is a certain risk that mainstreaming ultimately becomes more important than the focus on the core development objectives that interventions want to achieve. Furthermore, interviews raise the risk that multiple themes to be mainstreamed risk diverting from the central development purpose of MIPs.
- Under IPA III (59), a number of cross-cutting themes including gender equality, climate change, environmental protection, civil society, gender equality, human rights-based approach, are mainstreamed and therefore implemented under all five windows. AAPs 2021, 2023 in Kosovo* (60), North Macedonia, Serbia all represent all cross-cutting issues. Türkiye AAPs 2021, 2022, 2023, taken together, represent all cross-cutting issues.
- This (long) list of cross-cutting issues corresponds to the policies prioritised under the IPA III Regulation (61): there is thus strong coherence between mainstreaming and the Policy first approach, to the point that it may not be relevant to distinguish the two. While this is not a problem in itself, the difficulty lies in the number and variety of issues to be mainstreamed, which leaves a large margin of appreciation to the bilateral programming actors, including the Governments (through the preparation of the Strategic Response) on which issues to prioritise, how, and under which window.
- NDICI-GE expands the list of issues that programmes should address transversally including not only gender, democracy and human rights, environment and climate change as in the past but also biodiversity, disability, conflict-sensitivity, peace, resilience, and disaster risk reduction in accordance with the NDICI-GE Regulation (62).
- NDICI-GE allocates 30 % of its budget to climate objectives and has set targets for biodiversity spending: 7.5 % in 2024 and 10 % for 2026-2027. Migration management and governance are earmarked 10 % of the budget. Specific financial commitments include EUR 500 million for Local Authorities, EUR 26.725 million for three EIB investment windows, and additional resources for thematic programmes: EUR 200 million each for Human Rights and CSOs, and EUR 600 million for Global Challenges.
- According to the 2022 Annual Report on the implementation of the European Union’s External Action Instruments in 2021 (63), 236 actions = 78.1 % of new actions scored G1 or G2 (Indicator GERF 3.13 Number and share of EU- external interventions promoting GEWE). Regarding the indicator GERF 3.1b Amount and share of EU-funded external assistance contributing to: b) protecting biodiversity; commitments in 2021 amounted to EUR 530 million (4.9 % of annual spending).
- Neither documents nor the EUD written contributions and the validation survey include any reflection on the quality dimension of this rigid quantitative approach. The topic was only briefly addressed in

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(59) IPA III regulatory framework (Regulation and Delegated Regulation), programming guidance, thematic guidance, and IPA III Programming Framework.

(60) This designation is without prejudice to positions on status, and is in line with UNSCR 1244 / 1999 and the ICJ opinion on the Kosovo* declaration of independence.

(61) Comparison between IPA III Regulation Recitals 6, 7, 8 and 25, 27. Comparison between IPA III Regulation (Recital 6, 7, 8, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22, 23, 24, 26, 27) with IPA III Programming guidelines.


some interviews and only when interlocutors were explicitly asked about it. Most interviewees did not regard earmarked funding as a problem. Yet, a small number of interlocutors voiced concerns that rigid earmarked funding could restrict the overall flexibility in aligning MIPs with partner priorities and needs. One interlocutor suggested that the approach to earmarked funding might lead to a ‘bean counting’ culture.

- The instrument’s priorities are further oriented by targets defined in the IPA III regulations, in a less prescriptive way than for the NDICI-GE. These targets are not contradictory to the ‘fundamentals first’ approach, but do not exactly reflect the scope of the three fundamentals either. Several thematic evaluations (64), demonstrated that prescriptive targets and cross-cutting issues do not guarantee the capacity and willingness to effectively mainstream an issue: it is necessary to support this approach with appropriate programming, tracking and monitoring tools.

- The realisation of the targets, and the overall budget dedicated to human rights, democracy, civil society / CSOs and Local Authorities will be difficult to track in the absence of clear markers. Under the current MFF, the thematic programme for CSOs envisages EUR 1.5 billion over seven years.

- In-depth analysis of some samples of financial data (originating from the ‘Statistical Dashboard’) revealed that data coding was frequently erroneous: for instance, about one tenth of RRP allocations (a relatively modest data set, which should be easy to manage), are wrongly coded as reaching CSOs, when they are actually channelled through EU Member States government development agencies, EU agencies, or private companies.

- Likewise, interviews with EU and non-EU actors, and review of financial data sets in recent country evaluations, showed that financial allocations in geographic programming are frequently coded under appellations that serve to calculate the amounts dedicated to human rights and democracy, when they actually target governance or institutional capacity building in general, with no obvious link to democracy and human rights.

- This monitoring challenge was already demonstrated by the 2017 MTE of EFIs, and thematic evaluations so far (including recently the evaluation of GAP III, which showed that even with a marker, such tracking was challenging, and it’s a concern also registered in the Meta-Evaluation of Human Rights and Democracy thematic projects).

- As corroborated by recent research (65), perceptions of stakeholders point to shortfalls in funding patterns. As one contributor to the targeted consultations put it, ‘it is good to have targets — but there is a need to emphasise how the markers reflect a human rights approach, and a leaving no one behind approach in line with the policies.’

Consultations with stakeholders further highlight:

- The OPC responses on whether the EU adequately addressed the thematic dimensions in geographic programmes were overall more positive (40 %) than negative (28 %). The categories of respondents whose answers were more positive than negative were public authority, company / business, non-EU citizen, and academic / research institution — in contrast with CSOs who were less positive.

- Feedback from the OPC and interviews confirms the limitations of the target-marker system as a policy monitoring tool.

- Interviews also suggest that CSO funding could be hard to document, as sub-granting and, even more so, indirect management of grants by international organisations as a growing modality is difficult for the EU to monitor. Sub-granting and indirect management with international organisations entail financial risks for the organisations providing the funding, as they are liable toward the EU. Several CSOs interviewed report that these schemes incentivise primary grantees or international organisations to be even stricter with the selection and administration of (sub-)grants than the EU would be, as they are sometimes anxious about responsibility placed upon them.

Mainstreaming of and within peace and security

Document review shows the following:

- The mainstreaming of peace and security is visible in the PSCP Annual Action Programmes (2021, 2022 and 2023) where conflict prevention and peacebuilding, social inclusion and human development, and human rights, democracy and governance are central to most actions and in line with NDICI-GE targets. The AAP 2022, for example, will focus the support in three areas, i.e., i) Human security, resilience and stabilisation (e.g., community-led security assessments, dialogue, cooperation mechanisms, resilience initiatives, advocacy; intra-community dialogue for human security, ...); ii) inclusivity in peace and security (e.g., promoting gender-sensitive approaches; leadership of women, 

(64) EC, Mid-term evaluation of the implementation of the EU Gender Action Plan III (2021-2025), 2023; EC, Evaluation of the EU’s support to climate action and environment in Enlargement and Neighbourhood regions, 2022; EC, Evaluation of the Civil Society Organisations and Local Authorities thematic programme (2014-2019), 2020.

Consultations with stakeholders further highlight:

- Several FPI interviewees have also mentioned that there has been greater attention under the PSCP to mainstream Climate and Gender Equality, with action documents modified to take into account these more ambitious EU targets and indicators.
- EU staff report difficulties in implementing gender- and other targets, and reporting on them in a meaningful way. Some deemed that several targets had not been reached according to initial calculations on climate, for instance; that not all targets apply to FPI programming of Thematic programme Peace and Stability and Conflict Prevention, for instance migration and biodiversity; and that FPI did not follow the targets in a structured, dedicated manner.
- Substantive, as opposed to tick-the-box mainstreaming remains difficult and, as pointed out by some FPI staff interviewed generally requires EU staff to rely on external expertise as well as move towards more qualitative reporting.
- FPI interviewees also identified the need for more tools and clear guidance on meeting the targets, rather than just deciding on them and monitoring compliance.

**JC 1.3 Partnership approach with authorities and other stakeholders from partner countries and regions**

The analysis under this JC has relied on a variety of sources of information. In addition to the documentary review, the analysis built on the mapping of EU spending actions as well as interviews, targeted consultations and surveys. The main sources used are summarised in the table below.

**Table 4 Main sources of evidence for JC 1.3**

<table>
<thead>
<tr>
<th>Main sources – documents</th>
<th>Main sources – surveys</th>
<th>Main sources – interviews &amp; targeted consultations</th>
<th>Other sources</th>
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</thead>
<tbody>
<tr>
<td>EFI regulations &amp; programming guidelines, e.g., NDICI-GE Regulation; IPA III Regulation and Programming Framework</td>
<td>EUD written contributions</td>
<td>Interviews: EU HQ, EUDs, IOs and international CSOs, in-country stakeholders (authorities, CSOs), European Development Financial Institutions / IFIs and EU Member States (HQ, local representatives)</td>
<td>Mapping of EU spending actions</td>
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<tr>
<td>EFI-level reporting and previous EFI evaluations</td>
<td>In-country stakeholder survey</td>
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<tr>
<td>EU sector guidelines and thematic guidance notes and templates</td>
<td>Validation survey</td>
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<td>Strategic evaluations (thematic, country, regional)</td>
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<tr>
<td>Strategic programming docs (MIPs, SRs) and AAPs</td>
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<tr>
<td>Other (e.g., think tank reports)</td>
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**Finding 9** There is little evidence that the new EFIs have strengthened geographic partnerships. There has been more continuity of approaches than change in most regions and thematic areas, the main exceptions being countries where the NAO / RAO system has been abandoned and the partnership with Local Authorities.

**Related indicator(s):** I.1.3.1, I.1.3.2, I.1.3.3, I.1.3.5, I.1.3.6

**Quality of evidence**

**Partnerships in the Neighbourhood**

Document review and consultations show for example:
• Article 12c of the NDICI-GE Regulation (66) lays out the principle of inclusive programming. The programming guidelines (67) emphasise the need for EUDs / HQ to engage with all stakeholders when designing programmes: ‘The programming exercise will follow an inclusive process encompassing broad and transparent consultation both at country / region and Headquarters levels with all relevant stakeholders, partner countries governments and parliaments, civil society organisations (CSOs) including women and the youth, Local Authorities, traditional authorities when relevant, private sector, non-EU donors, the UN, the International Financing Institutions and other stakeholders. Dialogue will take place in order to facilitate stakeholders’ respective contributions, as appropriate, and to allow them to play a meaningful role in programming.’

• The engagement with stakeholders prior to and during the programming process appears to have been significant as testified by the documents themselves. A recent study (68) and the European Court of Auditors also attest strong engagement with stakeholders: ‘Overall, the priority areas and supported sectors were relevant, as they responded to the development priorities (69).’ This is further corroborated from the feedback given by interviewed counterparts in partner countries.

• Although the Joint Communications are mentioned in the MIPs, references to national strategies are less frequent and rarely aligned in terms of temporal scope (70).

• In a webinar organised by the European Think Tanks Group (71), concerns have also been expressed about an increasingly EU-centric cooperation in relation to the Global Gateway initiative (72). Launched in December 2021 as an infrastructure partnership driven by values, high standards, and transparency to address global infrastructure development needs (73), it was met with scepticism by certain partner countries due to its perceived excessive focus on EU interests and values and disconnection from partner countries’ needs (74). One EUD in the Southern Neighbourhood complained that actions agreed with country counterparts were being side-lined by Global Gateway, resulting in the perceived loss of time and resources invested by stakeholders in programming efforts.

• Respondents to the validation survey expressed mixed views as to whether the current EFIs have helped to strengthen the partnership with national governments with 40 % agreeing while 49 % disagreeing.

Consultations with partners in the former DCI region

Document review shows the following:

• Based on the recent ECA report covering NDICI-GE programming (75) and extensive interviews, it is evident that 2021-2027 programming saw broader consultations in partner countries compared to previous MIP formulations. EUDs engaged with a diverse group of stakeholders, including government officials, civil society, and the private sector, early in the MIP development. While most stakeholders valued this inclusive approach, there were instances where key contributors, such as religious leaders, were missed. Generally, stakeholder feedback influenced the MIPs’ priorities.

• According mainly to the ECA report covering NDICI-GE programming, consultations in partner countries did not cover and address regional priorities. While the Commission and the EEAS developed the regional multiannual indicative programmes (regional MIPs) alongside the MIPs, they primarily engaged with partners and stakeholders in Brussels.

• All MIPs of sampled countries highlight the strength of alignment of the respective cooperation areas with national priorities, development plans, policies, strategies, etc. There is strong emphasis on national ownership throughout. This usually goes along with comprehensive context, needs and risk analyses.

Consultations with stakeholders further highlight:


(68) ECDPM, Catching up with Global Europe: 15 questions on the EU’s new financial instrument answered, 2021. Page 7.


(70) For example, the MIP Jordan refers to the Jordan’s Reform Matrix 2018-2024.


(72) There were 11 Global Gateway flagship investments in the Neighbourhood by March 2023 according to DG INTPA: EC, EU-Western Balkans and Neighbourhood flagship projects for 2023, 2023.


(74) While China has roads, bridges and dams to show for its 20-year-engagement with Africa, the EU brings red tape and a lecture,’ EURACTIV Website, As EU seeks to rival China’s infrastructure offer, Africans are sceptical, 2021. https://www.euractiv.com/section/energy/environment/news/as-eu-seeks-to-rival-chinas-infrastructure-offer-africans-are-sceptical/.

• According to the EUD written contributions and interviews, the Global Gateway initiative and the Team Europe approach provide effective frameworks to enable a stronger bilateral and regional partnerships in addressing development challenges. For example, in Tajikistan the EU has promoted partnerships, consulting and coordinating with CSOs and private institutions on EU programmes; in the case of Nepal, the role of civil society is described as key in all priority areas and sectors; in PNG the EU has well established relations with key CSOs in PNG across many sectors and continuous dialogue with CSOs organisations during project implementation is anticipated in Forest Climate Change Biodiversity, WaSH and governance / human rights, including on peace building, gender equality, human rights defenders, and the fight against corruption; in Haiti, CSOs, Local Authorities and private sector were all included in the discussions for the creation of the MIP 2021-2027.

Strategic Response process under IPA III

Document review shows the following:

• According to the Strategic Responses’ templates and IPA III Programming Guidelines, Strategic Responses, under the lead of National IPA Coordinators (NIPACs), should build on intensive consultations in the beneficiaries: within the Government, between the Government and the Parliament, and with independent public institutions, civil society, private sector, international donors and partners, and of course the EU.

• According to the Strategic Responses’ template, under each window the beneficiary should analyse context and identify strategic relevance; identify key strategic priorities; and objectives and propose a list of actions for the respective window. Based on the IPA III Programming Framework and the Strategic Response, each beneficiary must propose bilateral actions for the programming year, which the EU may select based on policy relevance and maturity assessments, to design AAPs for each beneficiary. Then, after the EC adopts the AAPs, the EU and the beneficiary sign an annual Financial Agreement for the programming year concerned, for the actions selected by the EU.

Consultations with stakeholders further highlight:

• Interviews with the EUDs and headquarters, as well as with CSOs and NIPACs show that, despite sometimes considerable efforts invested by the NIPACs, ownership of the national authorities in the programming process is low; moreover, as emphasised at the IPA III Regional Conference in November 2021 (79) and interviews, not all IPA III beneficiaries are familiar with concepts such as the ‘sector approach.’

Abolition of the NAO system in sub-Saharan Africa

Document review shows the following:

• At country level, the NAOs have remained active participants in the discussion but, in most (but not all) (77) countries, they have stopped playing their role as main government counterparts and interfaces with line ministries.

• Under the NDICI-GE, RECIs (as former RAO) are no longer involved in the EU’s programming decisions; they themselves reported that they had not been (adequately) consulted during the elaboration of the regional MIP. According to the European Court of Auditors report (2023), the EC and EEAS organised four ‘information meetings’ with regional organisations and the African Union.

Consultations with stakeholders further highlight:

• Interviews with EUDs have reported that the switch to NDICI-GE has enabled them to focus on a reduced range of priorities from the outset (instead of having to consider all sectors as it was the case under the 11th EDF), and engage directly with selected line ministries. At the same time, however, the nature of consultations with line ministries has also fundamentally evolved from following a sector-wide approach to focussing on specific objectives.

• There was poor communication by the EU about its decision to dismantle NAO / RAO, leading to strong discontent (e.g., as evidenced by the contribution of OACPs (79) to the OPC implemented in the course of this evaluation):


(77) In DRC, the NAO (Minister of finance) was appointed by the Prime Minister as representative of the government for NDICI-GE programming purposes.

(78) Following the Organisation of ACP States (OACPS) Secretariat’s invitation to Member States and regional organisations to share their experiences on the programming and implementation of programmes financed under NDICI-GE, contributions were received, in particular at the extraordinary meeting of the West African network of national and regional bodies in charge of cooperation with the EU, which was held on 22 and 23 May 2023 in Abidjan, Côte d’Ivoire. Points mentioned provide an overall picture.
• Member States are concerned that ‘the gains’ of the Cotonou Agreement, namely the principles of development ownership and the co-management of resources, are not respected by the EU in the programming and implementation of programmes;
• The transition from EDF to NDICI-GE creates uncertainty for staff working in the NAOs, and this affects the monitoring of ongoing projects financed by EDF;
• It is difficult to monitor projects implemented by EU Member State agencies, as these agencies do not report to the relevant ministries. Relevant provisions requiring implementing agencies to report to national authorities should be included in financing agreements;
• There is no open dialogue between the EU and national / regional authorities on the programming and management of projects; and
• In some countries, the EU does not adequately consult national authorities when preparing financing agreements. This has led to situations where national authorities have refused to sign financing agreements because they were not involved in their preparation. This is often the case for projects implemented by Non-State Actors.
• As reported by EUDs in their written contributions and during interviews, the lack of a clear and timely political message on the abolition of the NAOs has made their engagement with the authorities more difficult.

Partnerships with Local Authorities

Document review shows the following:

• Recital (36) of the NDICI-GE Regulation foresees the earmarking of funds for Local Authorities under geographic programmes: ‘The Union should further enhance its support for Local Authorities’ capacity building in order to strengthen their voice in the sustainable development process and advance political, social and economic dialogue, as well as promote decentralised cooperation. Support to Local Authorities under the geographic programmes should amount indicatively to at least EUR 500 000 000.’
• However, the review of MIPs covering the sample countries of this evaluation shows that funding to Local Authorities is not appearing in most.
• A recent paper (80) highlighted that: ‘The integration of Local Authorities in development and EU external action is far from being a widespread reality. Their participation in the dialogues and their access to EU funding remain difficult. Looking to the future, Local Authorities barely feature in the post-Cotonou debate. The draft negotiating mandate of the EU confines their role to ‘complementing governmental action’. In the ongoing discussions on the future EU budget and a new set of External financing instruments beyond 2020, no reflection exists so far on the place that will be given to Local Authorities.’
• Local Authorities lack a clear and uniform definition in the EU’s policies and programming documents, and their absence from the Global Gateway Communication, are symptomatic. The latest Communication on Local Authorities dates from 2013 (81), whereas policy documents on multiple other topics have flourished (82).

Consultations with stakeholders further highlight:

• The OPC participants from public authorities (19 contributions) reported perceived neglect of Local Authorities and a lack of dedicated resources to support decentralisation and local development.
• Interviews (covering a diversity of stakeholder groups) confirmed the finding on a reduced attention given to Local Authorities in the current MFF, partly due to the discontinuation of the dedicated budget line. Interviews also highlight that, while Local Authorities’ associations are represented at country level in Sector Working Groups which discuss the Economic Investment Plans (which form the basis for investment pipelines), relevant individual Local Authorities (e.g., municipalities concerned) are sometimes excluded from the design of specific interventions, especially investment projects that directly affect them, until very late in the design process; this is partly because the relevant line Ministries do not systematically engage them from the start.

(79) EU, Regulation (EU) 2021 / 947 establishing the NDICI-GE, 2021. Recital (36): ‘Support to Local Authorities under the geographic programmes should amount indicatively to at least EUR 500 000 000.’
(80) Bossuyt, J., Local Authorities in EU external action after 2020: Strategic actors or distant voices?, 2020.
(81) EU, Consolidated version of the Treaty on the European Union (C 326 / 17), 2012.
As some interviewees and one OPC participant highlighted: the 2023 Policy Forum on Development consultations on the NDICI-GE revealed that Local Authorities and civil society have sometimes struggled to understand how they could have a say, and therefore have not always been able to participate in the programming process.

Finding 10 Apart from global-level partnerships strengthened through Global Challenges, there is no evidence of strengthened partnerships in the major thematic areas covered by the EFIs.

<table>
<thead>
<tr>
<th>Related indicator(s):</th>
<th>Quality of evidence</th>
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<tbody>
<tr>
<td>I.1.3.1, I.1.3.2, I.1.3.3, I.1.3.4, I.1.3.5, I.1.3.6</td>
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Partnerships at global level

Document review shows the following:

- The Global Challenges MIP 2021-2027 (\(^{83}\)) does not mention partner priorities in the context of programming of Global Challenges actions and rather states that actions ‘should be applied strategically, in support of multilateralism and the rules-based global order’; ‘should promote EU’s priorities and values’ and ‘will finance global and trans-regional initiatives for achieving internationally agreed goals, …, protecting global public goods or addressing global challenges.’
- A core finding of the 2017 MTE of the EFIs (\(^{84}\)) was that it had proven difficult, and increasingly so, to agree on shared priorities with partner governments, particularly in sensitive global areas such as environment and climate change and migration, but also with regards to governance and human rights issues.
- According to the 2017 Evaluation of STRIVE / Horn of Africa project (Strengthening Resilience to Violent Extremism) (\(^{85}\)), the alignment with Kenyan national priorities has shown positive results. More broadly, beyond peace and security, Kenya is an example of a partner country where, according to an EU interviewee, the EU integrated in its MIP both Kenya’s priorities arising from strategic dialogue with the government; and Commission Priorities such as the Green Deal.
- As evidenced from programming documents, such as the Annual Action Programmes for 2021 to 2023 of the PSCP thematic programme, NGOs and CSOs in Europe as well as in the regions and partner countries remain important partners for dialogue and consultations to inform the EU’s programming on peace, security and related governance matters. However, there is no evidence that these exchanges have resulted in a stronger partnership approach compared to the previous MFF – for instance, the formulation of CSO roadmaps as part of the country programming and implementation has been in place for several years already.

Consultations with stakeholders further highlight:

- Partner-country authorities, NGOs and CSOs as well as EU Member States see the Geographisation principle overall, accompanied by mandatory conflict assessments for fragile countries, as a positive step as it helps zoom in on country-specific fragility and conflict situations.
- While the Geographisation principle brings along a stronger focus on the partner countries, respondents to the in-country stakeholder survey stressed the need to pay continued attention to cross-border and regional security challenges which should not be de-prioritised due to the enhanced country focus.
- Interviewees from NGOs and CSOs see the new EFIs as a continuation from the past with some improvements instead of something fundamentally new.
- A continuation is also seen with regard to the involvement of partner-country NGOs and CSOs for implementing actions, which remains low despite EU statements that the ‘localisation agenda’ needs to be given more attention, including in the CPPB domain. The continued ability of FPI to programme actions without going through the government helps promote more localised CPPB approaches. While direct funding for local in-country CSOs is low, the EU is actively looking into ways to directly support them – e.g., through Call for Proposals for in-country CSOs only. According to interviews with one CSO and one INGO in Kenya and Somalia, respectively, this is seen as a shift that makes the EU one of the leading donors in supporting localisation. Few other donors are providing such direct funding to national CSOs.
- NGO representatives stressed the need to rethink risk appetite for supporting peacebuilding in fragile states (also compared to the risk appetite for supporting security sector actors), which was also mentioned during interviews with EU staff.


\(^{85}\) EC, Evaluation report Strengthening Resilience to Violent Extremism – STRIVE (Horn of Africa), 2017.
• In Chad, the conflict assessment led by INTPA G5 and the EEAS was considered to be useful and timely to orient upcoming actions; however, it was an internal EU exercise (no EU Member States’ participation) and was not subject of public consultation as stressed during an interview.

• According to EC interviewees, the off-budget EPF is opening new doors for peace and security related dialogue with partner authorities – a dialogue which is mainly coordinated with the political section in EUDs (not the cooperation section) and mostly not closely coordinated with other actions in the security sector domain and in the area of conflict prevention and peacebuilding.

**Finding 11** Despite some improvements over EFSD, EFSD+ continues to be affected by a ‘partnership gap’ – the structural difficulty of forming durable partnerships with stakeholders.

**Engagement with partner country stakeholders under EFSD+**

Document review and consultations show the following:

• In the sample studied, no PIPs explicitly referred to consultations with partner countries’ representatives. There is, however, explicit mention of requirements to notify authorities in advance of making an investment commitment (86).

• Several issues have affected blending sovereign operations at the level of partner countries: at the upstream / policy level, EFSD experience shows that partner countries’ governments showed limited capacities in developing a strong pipeline of projects, and helping prepare these projects. At the operational level, issues such as weak inter-ministerial coordination and high staff turnover (in a context where investment operations take several years to materialise) also affect national authorities’ engagement in the design and implementation of projects.

• Regarding guarantees, several factors also help explain the limited engagement of partner countries’ representatives. First of all, the OA investment windows target neither sovereign nor non-commercial sub-sovereign operations. DFI s / IFIs rarely systematically engage with national and Local Authorities for private sector operations. In addition, some ministries are more familiar with traditional instruments such as grants, than guarantees which are i) less tangible – they do not fall under governments’ budget and control but they are instead implemented by third parties (DFIs / IFIs) which for some target only the private sector; and ii) more complex – portfolio approach, unfunded guarantees etc. For both types of operations, most DFI s / IFIs tend to rely on EUDs to engage with partner country authorities, including to align investment operations to policy dialogue and reforms activities.

• While NDICI-GE integrates EFSD+ guarantees into the cooperation programming cycle with partner countries (87), in practice the links to MIPs adopted at country and regional level remain very loose and dependent on the ability of EUDs to influence DFI s / IFIs’ investment decisions. When drafting MIPs, the EU, in consultation with local stakeholders (88), is required to identify investment needs which the EFSD+ can help to meet. Each MIP indicates the priorities which could potentially benefit from EFSD+ funding, with the option of indicative country allocations in the case of non-Neighbourhood countries (89). The EFSD+ investment windows are established taking into account the priorities and the indicative allocations set out in the programming documents. It is then the responsibility of the DFI s / IFIs to propose PIPs to the EC that are consistent with the priorities of the investment windows.

**EUDs’ role under EFSD+**

Document review shows the following:

• Under the EFSD, EUDs could, in principle, help shape and monitor blending operations, provided that they were involved very early on in the process (before the project fiche is fully defined). However, this was not always the case as reported by the 2020 report on the implementation of the EFSD (90).

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(86) E.g., EFSD+ Guarantee PIP for the Better Futures Programme guarantee, submitted by IFC.
(87) EU, Regulation (EU) 2021 / 947 establishing the NDICI-GE, 2021; and EU, Council Regulation (EC, Euratom) No 480 / 2009 establishing a Guarantee Fund for external actions, 2009. Preamble (62): ‘The allocation of funds to be used for EFSD+ operations should be based on the relevant programming documents, in particular the priorities defined therein, and should take into consideration, inter alia, the specific realities and needs of each partner country or region.’
(88) EC, Guidelines for the programming of the NDICI-GE (2021-2027), 2020. In particular, Annex 8 on Stakeholders central government, and Local Authorities, private sector and civil society organisations, local, European and / or international financial institutions, notably the EIB.
(89) In the case of the Neighbourhood region, national earmarking of funds in the regional / multi-country MIPs is not foreseen but a certain percentage of these funds can be indicatively ‘soft’ earmarked for a group or category of partner countries.
• Under EFSD+, to address the issues experienced under the EFSD, the EUDs are more involved in early stages – where their engagement is critical to ensure that investment operations respond to policy objectives, local needs and interests and are linked to other forms of support. All PIPs reviewed by the Evaluation Team were developed on the basis of consultations with EUDs.

Consultations with stakeholders further highlight:

• As for guarantees, interviews reveal that the involvement of EUDs was limited due to their late involvements, but also due to the instrument complexity and management (highly centralised). For both blending and guarantees, issues relating to capacities (human resource, knowledge and skills) – despite trainings and additional staff hired – were also highlighted as factors impeding EUDs to fully play their role.

• According to interviews with EC HQ staff, a stronger degree of ownership of EUDs on EFSD+ implementation has been achieved through a better integration of the EFSD+ in the programming exercise.

• Interviews and consultations with DFIs / IFIs, EC HQ staff and experts indicate that there is a persisting capacity constraint in many EUDs. This ‘human resources and skills’ gap is less pronounced in countries where markets are developed and more guarantees are used and EUDs have a trade section – which often has a good understanding of investments. It is worse in countries with underdeveloped capital markets and traditionally aid-dependent LDCs.

• Besides the issue of capacity, there is also an issue of incentives: EUDs’ performance is often primarily assessed against indicators relating to grants / budget support disbursement and impact. Their work on the investment side is not systematically assessed nor rewarded, and hence, when there are competing priorities, the EFSD+ is less likely to be the area where most efforts will be dedicated.

EQ2 – Efficiency and flexibility in programming and delivery

JC 2.1. Learning curve and enabling environment for new ways of working

The analysis under this JC has strongly relied on documentary sources. Interviews, targeted consultations and surveys have allowed to confirm and enrich the findings emerging from document review. The main sources used are summarised in the table below.

Table 5 Main sources of evidence for JC 2.1

<table>
<thead>
<tr>
<th>Main sources – documents</th>
<th>Main sources – surveys</th>
<th>Main sources – interviews &amp; targeted consultations</th>
<th>Other sources</th>
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</thead>
<tbody>
<tr>
<td>Mid-Term Evaluation of EFIs, 2018</td>
<td>EUD written contributions</td>
<td>Interviews: EU HQ, EUDs, IOs and international CSOs, in-country stakeholders (authorities, CSOs)</td>
<td>Mapping of EU spending actions</td>
</tr>
<tr>
<td>EFI regulations &amp; programming guidelines, e.g., NDICI-GE Regulation; IPA III Regulation and Programming Framework</td>
<td>Headquarters written contribution and comments</td>
<td>Targeted consultations with EU Member States, UN, CSOs and Local Authorities.</td>
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<tr>
<td>EFI-level reporting and previous EFI evaluations</td>
<td>In-country stakeholder survey</td>
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<tr>
<td>Strategic evaluations (thematic)</td>
<td>Validation survey</td>
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<td>EU sector guidelines and thematic guidance notes and templates</td>
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<tr>
<td>Current Strategic programming docs (MIPs, RIPs, SRs) and AAPs</td>
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<tr>
<td>Former Strategic programming documents (MIPs, NIPs, Strategy Documents, SSRs, Financial Agreements)</td>
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<tr>
<td>EAMRs at country and HQ level</td>
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Finding 12 The simplification of the EFIs’ structure and regulatory framework, especially through the establishment of NDICI-GE, is a significant step forward in terms of efficiency and clarity.

### Related indicator(s): I-2.1.2, I-2.1.2, I-2.1.3

### Quality of evidence

#### Simplified EFIs’ structure and its effects on stakeholders’ understanding

Document review shows the following:

- Despite some progress with the adoption of a common implementing regulation (⁹¹), lessons learned from the previous MFF showed that the structure of EFIs was too complex to allow streamlined programming and clear understanding by all stakeholders (⁹²). This was corroborated by country evaluations, which highlight the complexity of the former EFI structure, which made programming sometimes difficult to streamline and comprehend, despite the complementarity of the various instruments (⁹³).
- With the transition from the previous to the current MFF, the architecture of EFIs and the corresponding regulatory framework has been simplified, from ten (⁹⁴) to four (⁹⁵).
- Streamlining was explicitly sought by the DOAG Regulation (⁹⁶).
- Contrary to NDICI-GE, IPA III and DOAG, INSC covers all countries and territories outside EU Member States (⁹⁷). Comparison between the previous and current INSC Regulation shows that, unlike other instruments, INSC features strong continuity between the previous and current regulations: the new Regulation envisages new synergies with NDICI-GE and new avenues of work (nuclear transparency, possibility to work with nuclear operators), but these do not change the logic of the instrument, nor does it fundamentally affect the ways of working.
- Recent strategic evaluations show that this simplification of the EFI structure led to streamlined programming (⁹⁸).

Consultations with stakeholders further highlight:

- Interviews with EUDs / EU Offices sampled countries in Asia, the Americas, the Caribbean, the Pacific, sub-Saharan Africa, Neighbourhood revealed an overall agreement that one single process in NDICI-GE was easier to comprehend, despite the necessity of familiarizing oneself with the new Regulation. In the case of the OCTs almost all interlocutors noted that the introduction of DOAG as a single instrument had streamlined procedures and processes particularly with regards to programming.
- Interviews with EU staff show that keeping INSC as a separate instrument (which diverges from the general EFI streamlining trend) is due to the very specialised, technical nature of this instrument. All internal and external interlocutors concurred that this choice was adequate. However, being stand-alone instrument, INSC is increasingly labelled as a ‘niche’ instrument.

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(⁹⁴) DCI, EDF, EFSD, ENI, EIDHR, IPA II, INSC, PI, OAD / Greenland Decision, INSC.
(⁹⁵) NDICI-GE, IPA III, DOAG, INSC.
(⁹⁸) EC, Evaluation of the EU Cooperation with the United N in External Action, 2023; EC, Evaluation of the EU support to Rule of Law and Anticorruption in Partner Countries (2010-2021), 2022.
Likewise, EU partners, including CSOs, report feeling more familiar with the EFIs now than before 2021 (99). This is particularly the case for international CSOs, who consider the new architecture as more streamlined, therefore simpler for them (international CSOs) and for their constituencies (CSO platform) (100).

Targeted consultations with UN agencies confirmed the perception that the streamlined structure is more operable for them as implementing partners.

More unified programming processes

Document review shows the following:

- The team conducted a comparative analysis of the programming documents in the sampled countries under the former MFF (101), and the current MFF, focussing on the following key elements: structure, time coverage, and thematic coverage. This comparative analysis showed that these key elements varied from one instrument to another. The team then analysed the equivalent programming documents under the current MFF through the same lens (102). This analysis showed, that under NDICI-GE, in contrast with the previous MFF, these documents were well aligned in terms of structure, time coverage, and thematic coverage – while giving space to the specificities of the respective countries. This proves a more coherent, more streamlined and more systematic programming process and programming product across the board.

- The team additionally compared the key objectives and approaches of the regional level programming documents (103). This analysis also showed significant differences from one instrument to another. The team then compared the equivalent documents under the current MFF, which showed the same systematisation and streamlining as observed at the country level under NDICI-GE.

- The situation is different for IPA III, as analysis showed that the streamlining and alignment of the programming process was already present under the previous MFF, thanks to the IPA II Indicative Strategy Papers which had a coherent and constant structure (104) and due to the specific, sector-oriented approach of this instrument (105). The analysis of the IPA III Programming Framework (106), compared with the EU Negotiation Chapters (107) showed strong alignment between the two. The sampled Strategic Responses, analysed in comparison with the above two documents, are also fully aligned with the Windows Structure of the IPA III Programming Framework, as envisaged by the Strategic Response template (108).

- At the same time, the comparison of the Programming Guidelines for IPA III, with their predecessor show the profound difference between the previous and current MFF in terms of programming process. The Strategic Responses, being led by the national authorities, and as a repository for strategic programming, are intrinsically different from the Indicative Strategy Papers which, under IPA II, were prepared under the leadership of the EU.

Consultations with stakeholders further highlight:

- Consultations with EUDs confirmed that the programming process is more systematic under the current than the previous MFF (109).

(99) Results from the in-country stakeholder survey conducted for this evaluation provide evidence of this increased understanding and familiarity with the instruments. show that the median self-reported level of familiarity with EFIs rose from 6 before 2020 to 7 now. In the geographic areas covered by NDICI-GE, this median level rose from 5 to 7. In the Enlargement region, it stayed at 8. The same survey shows approximately a 10 % increase in the average self-reported familiarity.

(100) Targeted consultations with CSOs and Local Authorities, confirmed by five interviews with representatives of international CSOs / CSO platforms.


For countries covered by EDF: MIPs 2014 Chad, Senegal, Kenya. For OCTs and Greenland: EU 2014 Programming Document for Sustainable Development of Greenland; EU Saba Funding Agreement with Saba 2017.


(104) IPA II Indicative Strategy Papers for Kosovo*, North Macedonia, Serbia, Türkiye.


(108) Strategic Responses Kosovo*, North Macedonia, Serbia, Türkiye.

(109) Interviews with EUDs in sampled countries in sub-Saharan Africa, Latin America, Asia and Pacific, and in Greenland.
These consultations also introduced nuances to this perception of a streamlining programming process: EUDs emphasised in interviews that under the NDICI-GE they still have to manage interventions coming from different sources of funding – with the Rapid Response Pillar and CSO thematic programme retaining the same procedures (call for proposals) as before. Some EUDs (sub-Saharan Africa, Asia) have shared their concerns that, under NDICI-GE, the FPI / RRP procedures remain cumbersome. As explained by one EUD, ‘For FPI, it is positive that the option to present concept notes five times per year has been maintained as it provides the EU with the flexibility to respond to new political priorities on the ground. However, the opportunity to simplify the quick response procedures (ICSP / FPI2) was missed.’

Interviews with EU staff in Headquarter, EUDs and national stakeholders, confirmed during targeted consultations with EU Member States, showed that the IPA III programming process is profoundly different from that of its predecessor. Interviews with EUDs / EU Office in Kosovo*, and with DG NEAR Geo Desks for Western Balkans and Türkiye exposed the general agreement that the IPA III Programming Framework offers a coherent, single point of reference across beneficiaries as a basis for more unified bilateral programming.

Efforts devoted to learning new ways of working

The level of effort invested in the transition is evidenced by document review:

- During the transition period to the new MMF, the EC prepared and issued a series of guidance material to support the new programming process, and the corresponding monitoring frameworks \(^{(110)}\).
- DG NEAR and DG INTPA further prepared and issued various templates (MIP, Strategic Response, Action Documents, TEI) and guidance documents on technical aspects such as the Framework Financing Agreements.
- They additionally prepared thematic guidance documents such as thematic Concept Notes, guidance papers and thematic assessments available on the EC intranet to EUD and HQ, and shared with the Evaluation Team \(^{(111)}\).
- The 2020 Global Challenges Thematic Concept Note \(^{(112)}\) constitutes a good practice, thanks to its level of detail and clear benchmarks. It contains detailed suggestions, including specific areas for action, for each of the 4 P’s.

Based on interviews, these documents are always applied in the programming process, although with some uncertainties on the part of the staff:

- Interviewees from EUDs in the Neighbourhood, revealed that it is not clear how these should be applied during the programming process.
- Concerns were expressed on the compatibility of the timeline of EU’s and Partner’s programming cycles stemming from the dates of introduction of the new regulations, and the duration of the MFF \(^{(113)}\).
- Interviews with EUDs (e.g., in sub-Saharan Africa) and with EU staff in headquarters showed that EU staff highly valued ‘learning by doing’ thanks to extensive teamwork. This teamwork and direct support between EUDs and headquarters enabled to overcome the inherent difficulties of transition to new programming processes, and to better appropriate the guidance documents. Examples given by the interviewees included the preparation of the MIP in Kenya, Chad, Senegal, Madagascar, Somalia.
- Interviews with EU officials suggest that, in line with the NDICI-GE Regulation, DG INTPA staff has been evolving from a clear focus on development cooperation towards a more policy and interest-driven approach to international partnerships. Still, the experience of most interviewees is that of lack of staff with the experience, skills and mindset to pursue EU interests and form partnerships on a mutual interest basis in some parts of DG INTPA. This leaves a gap in the expertise required to pursue, EU interests and partnerships based on mutual interests while serving development cooperation objectives, especially with MICs and the HICs.
- Interviews with EU officials show that, since the establishment of the NDICI-GE, line DGs had to find their way to initiate programmes with limited or no guidance. At the beginning, they referred to FPI in the understanding that this was the service responsible for EU foreign policy needs and priorities, as


\(^{(111)}\) The themes include Global Challenges, Human Rights, Democratic Governance, CSOs, Local and Regional Governments, Global Challenges, Conflict, Multilateralism and Partnership, Migration, Culture, Erasmus+, Strategic Communication Initiatives and Public Diplomacy Actions, Investment, Investment Climate, Trade and Economic Diplomacy, Triple Nexus (humanitarian-peace-development) and Digital Transformation.

\(^{(112)}\) EC, NDICI-GE thematic programme on Global Challenges: Concept note for pre-programming, 2020.

\(^{(113)}\) Targeted consultations with UN Agencies.
it was the case under the PI. Another reason was that the same staff had previously run programmes financed by the past PI that they wanted to continue. Uneven understanding between FPI and DG INTPA especially on how to share responsibilities around EU foreign policy needs and priorities has led to delays and cumbersome negotiations. Progressively, FPI has referred these programmes to DG INTPA / NEAR.

Review of documentation further showed that the sequence of issuance of the IPA III guidance documents on programming was delayed compared to that of NDICI-GE, and compared to the sequencing of the programming process. The chronology of documents shows an overlap rather than sequencing: regulatory framework (blue), guidance (green), and programming (amber).

- On 14 June 2018, the Commission published its legislative proposal for a regulation establishing the Instrument for Pre-accession Assistance (IPA III) for the period 2021-2027 under the current MFF Heading 6 'Neighbourhood and the World' ([114]). This marks the launch of IPA III preparations.
- In March 2019, the European Parliament adopted a Resolution ([115]) introducing various amendments to the Commission proposal, including to the definition of the IPA’s specific objectives, calling for increased financial resources, increased involvement of civil society organisations, and strengthened conditionality provisions.
- In June 2020, beneficiaries started submitting the first draft action fiches under the five Windows (Strategic Response’s template / guidelines, new Action Documents’ templates, and content of Strategic Responses were not issued yet)
- On 29 June 2020 the Director-General of DG NEAR issued a letter to the NIPACs giving them notice of impending guidance regarding indirect and direct management, annual and multi annual programmes.
- In July 2020, the Commission shared the templates for CBC programmes with the beneficiaries.
- On 27 November 2020, ahead of the finalisation of the IPA III regulatory framework, the EU provided the beneficiaries with the Strategic Response template.
- On 23 July 2021, the Commission issued the IPA III draft Action Document template ([116]), subsequently shared with the beneficiaries ([117]).
- On 15 September 2021, the European Parliament and the Council issued the regulation establishing the Instrument for Pre-Accession Assistance (IPA III) for the MFF 2021-2027 ([118]).
- On 1 October 2021, the Commission adopted the Delegated Regulation, supplementing the IPA III Regulation, which entered into force on 3rd December 2021 ([119]). This Delegated Regulation outlines specific goals and key areas of focus for IPA III assistance.
- In November-December 2021, without Programming Framework from the EU, the Beneficiaries ran in parallel the preparation of Strategic Responses and of Action Documents (although the second should have stemmed from the first).
- On 23 November 2021, the EC issued a guidance note on co-financing, following which in late December 2021, the EUDs shared guidance with the NIPACs regarding the IPA III co-financing approach ([120]).
- On 8 December 2021, the Commission prepared, as means of guidance, a comparative table of IPA II and IPA III financial arrangements.
- On 10 December 2021, the Commission adopted the IPA III Programming Framework ([121]).
- On 15 December 2021 the Commission endorsed the IPA III Implementing Regulation which entered into force on 16th December 2021 ([122]).

([117]) E.g., Albania received the template on 27 July from the Director of DG NEAR A. Unpublished internal EC document – 28 / 07 / 2021.
([120]) For instance, this guidance was addressed to the NIPAC in Bosnia and Herzegovina on 20 December 2021. Unpublished internal EC document – 20 / 12 / 2021. For Albania, a similar letter was addressed on 21 December 2021.
• In December 2021, the Commission adopted the Annual Action Plans for 2021 (123).
• In late 2021, the beneficiaries provided action fiches proposed for funding over the following four years through IPA III (124).
• On 11 March 2022, the NIPACs received the guidance on multi-annual operational programmes as announced on 29 June 2020 (see above) (125).
• On 6 April 2022, the EC issued the model FFPA for comments to the NIPACs (126). The FFPA were signed with the respective beneficiaries during the second half of 2022 (127).
• On 25 October 2022, the Commission issued a new Action Document template for 2023 and subsequent years (128), which was communicated to the NIPACs in early 2023 (129) whereas beneficiaries had been requested to submit their action documents for 2024 by March 2023, and many had already submitted their action fiches using the older templates.
• In January 2023, DG NEAR issued the Programming Guidance for 2021-2027.

Consultations with the national stakeholders (interviews with national authorities, CSOs) revealed that the sequence of issuance of the guidance material did not correspond to the expectations of the beneficiaries. According to the interviews, this situation did not facilitate the transition to the new programming process. The figure below summarizes the process which the beneficiaries reported they originally expected.

Figure 1 Sequence of transition to IPA III, as expected by beneficiaries (130)

Finding 13 The Geographisation of NDICI-GE and the continuous country programming under IPA III shifted the centre of gravity of programming towards the country level, inducing an extra workload for the EUDs (and NIPACs), but decision-making does not always mirror this shift.

EUDs’ role for consultation, programming, and implementation

(124) In case of Montenegro, this was done on November 2021. See Government of Montenegro – Ministry of European Affairs, IPA III Strateški Odgovor, 2021.
(127) The first to enter into force was the FFPA for Kosovo* on 12 September 2022. Unpublished internal EC document – 20 / 09 / 2022. The last was the FFPA for Türkiye on 14 December 2022. Unpublished internal EC document – 14 / 12 / 2022.
(129) E.g., it was communicated to NIPAC Albania on 03 February 2023 by letter from the Acting Directors of DG NEAR A and B. Unpublished internal EC document – 03 / 02 / 2023.
Document review shows for NDICI-GE:

- As per the NDICI-GE Regulation, Article 4.5 provides that all actions should be funded, programmed and implemented through the geographic pillar. Thematic programmes and the RRP only come to bridge the gaps created by urgency or by the impossibility to program and implement satisfactorily at country level (131).
- In addition, thematic programmes include a large proportion of actions implemented at country level, as is the case for support to national CSOs under the CSO thematic programme, and for support to human rights defenders in some countries under the Human Rights and Democracy thematic programme (132).
- According to the thematic programme for Human Rights and Democracy MIP 2021-2027, there is continuity of business processes in Elections Observation Missions. This is also corroborated by interviews with INTPA Thematic Unit, EEAS, FPI.
- Review of country MIPs showed the timeliness and alignment of MIPs with guidance, templates, and policies.

Consultations with stakeholders and interviews further highlight (for NDICI-GE):

- Interviews with EUDs and EU staff in Headquarters showed that the first programming process under NDICI, being geographically, has represented a challenge for EUDs, particularly in terms of the amount of internal coordination necessary. However, interviewees concurred that this process also represented an investment for the future, as it enabled stronger alignment of views, and strong internal and external support to the MIPs.
- Difficulties in Neighbourhood and sub-Saharan Africa were reported during EUD interviews: interlocutors pointed to issues of timeliness, especially in crisis contexts. Regarding sub-Saharan Africa, there were in particular issues of time pressure, combined with decision to dismantle NAO system, which required EUDs to introduce (and explain) NDICI-GE’s new ways of working.
- Some EU officials interviewed felt that the (unofficial) flagging procedure to notify of emerging priorities for the FPR-RR envelope in countries under the responsibility of DG INTPA was too cumbersome, did not consider sufficiently their analysis of the context or the desire for continuity expressed by partners. This was especially the case in Latin America.

Document review and stakeholder consultations show for IPA III:

- Under IPA III the Beneficiaries through the NIPAC offices are in the lead for bilateral programming and implementation. This is in line with the accession ambition of the Beneficiaries. Country programming normally takes place continuously on the basis of the Strategic Responses, to be gradually implemented based on several principles (134):
  - Relevance to EU policies (135),
  - Maturity of proposals (particularly in terms of absorption and administrative capacity (136)),
  - Performance of the Beneficiary (137),
  - Retaining a fair share of EU support throughout the region (138),
  - As a rule, implementation gradually takes place through indirect management by the Beneficiaries, subject to certification (139). So far, all governments are awaiting their

(131) EC, Mid-Term evaluation of the External financing instruments (2014-2017), 2017; and EU, Regulation (EU) 2021 / 947 establishing the NDICI-GE, 2021; Recital 35: “The main approach for actions financed under the Instrument should be through geographic programmes, in order to maximise the impact of the Union’s assistance and bring Union’s action closer to partner countries and populations. That main approach should be complemented, where relevant, by thematic programmes and by rapid response actions, whilst ensuring the consistency and coherence of all programmes and actions.”


(133) The latter is also confirmed by thematic evaluation: EC, Mid-Term Evaluation of the implementation of the EU Gender Action Plan III (2021-2025), 2023.


(135) IPA III Regulation, Recital 30: IPA III Programming Guidance, section “Policy Relevance Assessment.”

(136) Interviews with EUDs, EU staff in Headquarters.

(137) IPA III Regulation, Recital 31, Art. 7.5, Art. 8.

(138) IPA III Regulation, Recital 31, Art. 7.6, Art. 8.

(139) IPA III Regulation, Recital 35, 52, Art. 9.2.
certification, except for Bosnia and Herzegovina and Kosovo*, for which certification is not deemed feasible yet in view of weak capacities (140).

Document review shows for DOAG:

- The DOAG Regulation highlights that DOAG continues the geographic programming practice which existed under the previous MFF.

**Headquarters' role in decision-making**

Document review, stakeholder consultations and interviews with EU officials show several instances of centralised decision making:

- Financial assistance is decided at headquarter level, consistent with the responsibilities afforded to the external action services (141). A good example is the centralised nature of decision-making processes for Blending (142).
- The regional programmes, decided and managed centrally, constitute a significant part of EU support in some regions, especially in sub-Saharan Africa (143).
- Interviews with EUDs and EU staff in Headquarters confirmed that the level of deconcentration of decision-making is lower on high-stake decisions.
- Document review and interviews with EU officials highlight that the activation of the FPN-RR in the case of countries covered by DG INTPA ultimately depends on HQ decisions, while most of the workload to start its activation falls on EUDs.

**Finding 14** Issues related to the environment of the EFIs (at EU HQ and EUD level) have complicated the transition from the previous to the current MFF; 'learning by doing' is likely to only partly bridge gaps where they exist.

<table>
<thead>
<tr>
<th>Related indicator(s): I-2.1.1, 2.1.2, I-2.1.3, I-2.1.4</th>
<th>Quality of evidence</th>
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</table>

**Priority of delivery over internal facilitation**

Document review and consultations with stakeholders show the following:

- The interview and survey data show that the staff needed, and still require, time to acquaint themselves with the new EFIs, their approach, and the related processes. The EUD validation survey shows that 46 % of respondents consider that EUD staff understand EFIs fully, and 31.6 % consider that headquarter staff do so. Others tend to believe that the staff at headquarters or EUDs understand the EFIs partially.
- Interviews with EU staff in Headquarters point to the demand in training resulting from the above. Yet, interviewees in EUDs and Headquarter highlighted the low priority and limited resources afforded to training, continuous guidance, and coaching of the EU staff through the changes entailed by the EFIs. Headquarters’ EAMRs, and thematic evaluations corroborate this trend, which pre-existed the EFIs (144).
- EU staff had little time to acquaint themselves with the new programming processes, due to the concomitance of the adoption of the regulations and the start of the programming process (145). EU interviewees across the regions and thematic issues noted that the relatively late adoption of the EFIs’ regulations, compared to the expectations and deadlines for country programming. EU interviewees and EUD written contributions noted that as a result, and despite anticipation by DG INTPA, the first programming cycle (consisting of the launch of the country MIPs and the first Annual Action Plans) was compressed.
- Based on interviews mainly with EU staff and development partners, the launch of Global Gateway in late 2021 was out of sequence, as it came after the completion of the 2021-2027 programming process. This further complicated the planning process.
- Issues of vacancy, staff turn-over were noted by interviewees in EUDs and Headquarters, as well as in EUDs’ written contributions, (in particular in fragile contexts). Examples of vacancies and high turnover of staff are also mentioned in the 2023 Evaluation of EU support to Somalia.

(140) Interviews with EUDs, EU staff in Headquarters, NIPACs.
(141) The proceeds of the 2021 EU Council Preparatory Bodies Including CODEV provide further evidence on decision-making processes.
(143) EC, Multi-Annual Indicative Programme 2021-2027 for sub-Saharan Africa, 2021.
(145) The NDICI-GE Regulation was adopted on 09 June 2021. The IPA III Regulation was adopted on 15 September 2021. MIPs were adopted in 2021.
The written contributions from the EUDs in the Neighbourhood highlighted the disruptive impact of the COVID-19 pandemic and the war in Ukraine. These events not only added pressure and uncertainty to the programming process, but also highlighted the challenges of planning and delivering assistance within a seven-year Programming Framework in an increasingly unstable and unpredictable context.

New ways of working and mainstreaming

Document review and consultations with stakeholders show the following:

- The EFIs require the mainstreaming of several cross-cutting issues. The evidence points to efforts invested during the previous and the current MFF in mainstreaming cross-cutting issues, including guidance material (146). During the current MFF, continuing the practice of the previous MFF, this guidance was complemented by targeted training, as evidenced by consultations: annual training on human rights and democracy programming, training on radicalisation through the STRIVE initiative, or training on conflict sensitivity, continued from the previous MFF (147). This is confirmed by past thematic evaluations (148).
- As a result, EUDs and headquarter staff are better equipped to programme country-level actions on issues covered by the thematic programmes (human rights, democracy, CSOs, peace and security, climate change, digitalisation), as evidenced by the review of MIPs and sampled AAPs (149).
- However, this is often done through targeted actions, more than through systematic mainstreaming in all intervention sectors evidenced by interviews with EUDs and with EU staff in headquarters. This is confirmed by document review (150).
- Among the experts who contributed to the OPG, 40% agree that thematic topics are being adequately addressed through geographic programming, while 28% disagree.

Country-led, performance-based programming under IPA III

Document review shows the shortcomings of the Strategic Responses:

- The IPA III Programming Framework (151) and Programming Guidance (152) feature a top-level policy approach. The IPA III Programming Framework comprises five Windows, which are fewer, and therefore broader than the former Sectors. Logically, an IPA beneficiary’s approach to a Window therefore supposes a common approach by several Sectors. Therefore, the preparation of the Strategic Responses requires a unified approach to the respective windows by several Ministries and authorities: the government needs to act as one. The IPA III Programming Guidelines also envisage that the NIPACs should coordinate this process (153).
- The SIGMA Reports point to the shortcomings in the IPA III beneficiaries in terms of administrative, and especially coordination capacities (154).
- The analysis of the Strategic Responses shows that these documents present long lists of actions without clear prioritization nor sequencing (155).

Consultations attributed these shortcomings to several factors:

- Written contributions from EUDs, interviews with EUDs, EU staff in Headquarters, NIPAC Offices, and CSOs, attribute these shortcomings to various capacity and political constraints curtailing the IPA III approach by beneficiaries:
  - The coordinating role of the NIPAC supposes full backup of the political leadership of the respective beneficiaries. But the internal (often polarised) politics in some beneficiaries incentivise the aggregation of wishes from various line ministries and actors, leading to what an interviewee called ‘Christmas tree’ strategic responses and proposed actions.

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(146) Thematic Guidance Notes (or equivalent) were issued on Global Challenges, Human Rights, Democratic Governance, CSOs, Local and Regional Governments, Global Challenges, Conflict, Multilateralism and Partnership, Migration, Culture, Erasmus+, Strategic Communication Initiatives and Public Diplomacy Actions, Investment, Investment Climate, Trade and Economic Diplomacy, Triple Nexus (humanitarian-peace-development) and Digital Transformation.

(147) Interviews with, and written comments from EU staff in Headquarters, corroborated by written contributions from EUDs.

(148) EC, Evaluation of the EU support to Rule of Law and Anticorruption in Partner Countries (2010-2021), 2022; EC, Mid-term Evaluation of the implementation of the EU Gender Action Plan III (2021-2025), 2023.

(149) MIPs, 2021 AAPs, 2022 AAPs: Chad, Haiti, Kosovo*, Moldova, Morocco, Senegal, Serbia, Tajikistan.


(155) Strategic Responses Kosovo*, North Macedonia, Serbia, Türkiye.
The capacity of NIPAC offices, and of public administration in general, has not risen up to the demands of the IPA III programming process, despite support to policy making and public administration reform provided under IPA II.

Capacity issues are essentially due to low investment into human resources and the lack of (adequate) retention policies. According to NIPAC interviewees, NIPAC Offices suffer from extreme staff turnover and general understaffing. Türkiye aside (which, compared to the size of its civil service, receives minimal IPA funding), the best staffed NIPAC Office is that of Serbia, but the latter also suffers from common capacity issues. For instance, the NIPAC Office currently comprises of two persons in Kosovo*, and in North Macedonia.

Capacity development for EFSD+

Document review shows the following:

- The regulatory framework of the EFSD+ uses the experience accrued through EFSD and the Western Balkans Investment Framework (WBIF) on innovative finance as an avenue for EU external action.\(^{156}\)
- The substantial changes coming with the EFSD+ necessitated far-reaching adjustments to the EC's internal processes and organisation:\(^{157}\):
  - Broad geographic scope encompassing all regions covered by external action, drastically increasing the number of involved stakeholders;
  - Diversification of the financial tools including pre-existing and new ones (i.e., grants, technical assistance, financial instruments, budgetary guarantees and blending operations);
  - Harmonisation of the planning, management and governance processes and documentation (templates, results and reporting frameworks, decision-making formats);
  - Internalisation of these aspects within the EU, including with the creation of a dedicated secretariat in DG INTPA and DG NEAR, a DG NEAR-DG INTPA joint risk management unit in DG INTPA, an expanded risk management function in DG BUDG, a Risk Assessment Group, a Strategic Advisory Board, and several Regional Operational Boards;
  - Proprietary risk modelling (defining among others the provisioning rates), and a guarantees' pricing scheme based on expected losses;
  - Creation of a Common Provisioning Fund;
  - The emphasis on a Team Europe approach to EFSD+, as well as more demanding results frameworks and monitoring and reporting systems add complexity.
- The EFSD+ structure draws from the previous EFSD’s simple ‘one-stop-shop’ governance structure, but it still lacks details on the business processes, distribution of roles and responsibilities of headquarters and EUDs.\(^{158}\). It does not fully reflect the experience of the WBIF governance, which ensures cooperation between the EU, EU Member States and DFIs / IFIs.\(^{159}\)
- To accompany this transition, the EU produced extensive guidance material: EU 2021 Methodological Notes on Debt Sustainability, Risk and Sovereign Lending; EFSD+ Instruction Note; EFSD+ Guarantee Implementation; EFSD+ Guarantee Programming; Risk Management Framework. Investment Windows.

Consultations with stakeholders further highlight:

- Interviews with EUDs and EU staff in headquarters show that grant-based country programming, and EFSD+ projects are difficult to coordinate for coherence, due to their very different temporal horizons. The long-term view of EFSD+ creates uncertainty for geographic programme staff, who is then not ready to initiate dialogue with partner countries on possible EFSD+ operations such as guarantees.
- Even the WBIF was criticised by several interviewees in EUDs and EU Headquarters, and by national counterparts, for its slow and cumbersome decision-making process.
- Interviews with EU staff in Headquarters, and written contribution from EU Headquarters provide evidence that the transition towards EFSD+ requires new human resources, which are not yet entirely present. Recruitment concerns essentially the staffing of the EFSD+ secretariat in DG INTPA and DG NEAR. Interviews show that the internal needs assessment conducted by DG NEAR (which identified necessary positions take on increased planning, management, oversight and coordination responsibility for financial operations in headquarters and in the EUDs) did not convert into the adequate scale of hires to serve these ambitions. Trainings provided were not sufficiently widespread, and especially, not long and thorough enough.

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\(^{156}\) EC, EFSD+ Strategic Orientations – 2021-2027, 2020.


• Interviews with EU staff in headquarters and EUDs show that the gaps in investment project planning and in financial risk management skills are particularly wide, although these skills are indispensable for the assessment of proposals, particularly under the External Action Guarantees. EUDs in particular, are poorly equipped in terms of technical expertise to take part meaningfully in concrete discussions on new investment projects, as identified for instance in Ukraine (among many other locations).
• There is no evidence to show that the deployment of the fund was accompanied by human resource assessment and strategic planning (despite the financial volume of the fund, endowed with approximately EUR 40 000 million including dedicated and open envelopes).
• In comparison, the EU Member States-internal facility INVEST EU, managed by ECFIN enjoys a fully-fledged back-office (written contributions).
• Written Contributions from Headquarters, confirmed by current and former Organigrammes show that DG INTPA re-assigned 16 regular staff and four seconded staff to existing Unit (currently E5), for operational and legal issues; plus a project team of seven regular staff from the geographic and thematic directorates who contribute (among other tasks) to EFSD+ operations management. These are not new positions. The INTPA Risk analysis and management sub-unit only has new positions. A few EUDs have a new ‘investment officer’ position (Indonesia, Thailand), but it is unclear whether these are additional as compared to the previous staff table.
• Interviews with EU staff in Headquarters, EUDs, and national stakeholders point that the human resources assigned to the design and management of investment projects in the partner governments and agencies sometimes also lack experience and skills, although they are an integral part of the planning and implementation process. This shortfall is compounded when these partners lack access to sufficient information: interviews with national counterparts and targeted consultations with EU Member States and CSOs also point to transparency issues – a concern already identified by the European Parliament (\(^{160}\)). As a result, even in North Macedonia, a candidate country with long WBIF experience, some WBIF funds were returned to the EU due to inability to disburse them (\(^{161}\). There are also capacity and efficiency issues on the side of the DFIs / IFIs, despite the experience of cooperation for the long-existing blending. In Ukraine, for instance, Commission services highlighted that cooperation with some DFIs / IFIs needs to improve in terms of mutual understanding (EBRD) and efficiency of implementation and disbursements (EIB) (\(^{162}\).

**JC 2.2. Transaction costs and efficiency: gains and losses from the transition**

The analysis under this JC has strongly relied on documentary sources. Interviews, targeted consultations and surveys have allowed to confirm and enrich the findings emerging from document review. The main sources used are summarised in the table below.

**Table 6 Main sources of evidence for JC 2.2**

<table>
<thead>
<tr>
<th>Main sources – documents</th>
<th>Main sources – surveys</th>
<th>Main sources – interviews &amp; targeted consultations</th>
<th>Other sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>• EFI regulations: NDICI-GE Regulation; IPA III Regulation, INSC Regulation, DOAG Regulation and Programming Framework</td>
<td>• OPC survey</td>
<td>• Interviews: EU HQ, EUDs, IOs and international CSOs, in-country stakeholders (authorities, CSOs).</td>
<td>• Mapping of EU spending actions, financial dashboard</td>
</tr>
<tr>
<td>• NDICI-GE Programming Guidelines, IPA III programming guidelines and notes.</td>
<td>• EUD written contributions</td>
<td>• Targeted consultations with EU Member States, UN, DFIs / IFIs, CSOs, Policy Forum for Development and Practitioners Network, Local Authorities.</td>
<td>• EU data from M&amp;E systems and related reporting</td>
</tr>
<tr>
<td>• MIP Template, SR Template</td>
<td>• In-country stakeholder survey</td>
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<tr>
<td>• CSO Roadmaps</td>
<td>• EUD validation survey</td>
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<tr>
<td>• Overarching policies on CSOs, Local Authorities, Team Europe, etc</td>
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</table>


\(^{161}\) Source: Interview with EUD.

\(^{162}\) The issue of delayed disbursements was prominent in loans to Ukraine contracted under the previous MFF, and which are still in implementation phase. This is concerning for future loans to Ukraine, which will take place in a much more difficult context.
Main sources – documents | Main sources – surveys | Main sources – interviews & targeted consultations | Other sources
--- | --- | --- | ---
- EFI-level reporting and previous EFI evaluations;
- Strategic evaluations (thematic, country, regional)
- EU sector guidelines and thematic guidance notes and templates
- Strategic programming docs (MIPs, SRs) and AAPs
- EAMRs at country and HQ level, AOSD Reports at country level
- Other: publications by Partners for Development; EU community of practice on peace mediation; National CSO reports / publications; EU Member States Research institute publications; ECDPM Publications; EPD Publications

**Finding 15** The new EFIs have entailed an increased but worthwhile workload (as compared to the previous MFF) for interactions, both internally and externally.

<table>
<thead>
<tr>
<th>Related indicator(s): I-2.2.1, I-2.2.2</th>
<th>Quality of evidence</th>
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</table>

**Breaking silos and EU-internal cooperation**

Document review and consultations with stakeholders show:

- The new EFIs have warranted intense EU-internal consultations and cooperation, culminating during the preparation of multi-annual programming documents. Interviews with EU staff in headquarters showed that this is a direct consequence of the simplification and streamlining of the EFIs’ architecture: by removing silos between the EFIs, NDICI-GE also pushes for removing silos in the programming process.
- The Policy first approach, which generalises the mainstreaming of cross-cutting issues (see EQ1) further requires internal consultations, to integrate the expertise of the EEAS, FPI, line DGs and thematic units throughout the programming in the NDICI-GE geographic and thematic pillars.
- The IPA III Programming Guidance (163) explicitly requires consultations and cooperation with a wide range of services across the EU. Likewise, the NDICI-GE Programming Guidelines direct programming staff to consult with line DGs and services, and the EIB as appropriate throughout the programming exercise (164).
- Consultations and coordination start within the EUDs. Interviews with EUDs, corroborated by EUDs’ written contributions, show that all sector staff needs to coordinate with specialised staff (e.g., in Moldova, sector officials working on local / rural development need to consult their EUD colleagues working on climate change in the EUD to mainstream this aspect) and with focal persons (e.g., in Serbia, sector officials working on waste management consult with the Gender Focal Person (165)). In India, the various EUD services divided labour while retaining close collaboration between DG INTPA (including the Regional Team), FPI, and EEAS.

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• EUD written contributions highlighted the difference in approach between the two DGs in charge of NDICI-GE programmes, with DG INTPA having greater access to thematic support through its thematic units and programmes than DG NEAR.

• Increased coordination and cooperation among external action services is registered by interviewees at headquarter level. The same trend is observed between external action and line DGs. The same was confirmed by EUDs in Kosovo, Serbia, Türkiye, although line DGs regretted less proactive interaction in the Enlargement region.

• Interviewees pointed to informal consultation and cooperation practices at headquarter level, but also (sometimes very efficiently) between EUDs and headquarter line DGs. This is confirmed by the review of samples MIPs; for instance, MIPs in Asia-Pacific and Latin Americas do not mention line DGs – yet, interviews in Chile point to frequent meetings with line DGs taking place, although this is not an institutionalised requirement.

• In contrast, the EEAS, DG INTPA, and line DGs operate relations with ASEAN on parallel lines, with distinct agendas (interviews, MIP review).

• Interviews with EU officials and EUD written contribution point that examples of coordinated and synergic actions between non-programmable FPN-RR and programmable resources under the geographic pillar is limited, often due to the prioritisation of different agendas or ways of working.

• NDICI-GE Annual Reports on implementation of EFIs point to the importance of coordination for rapid response, which in turn highlights the need to coordinate the allocation of the RRP. Interviews with EUDs, and EU staff in headquarters identify consultations on these allocations as particularly time-sensitive, and often intensive.

• EUD written contributions, and DOAG-related interviews deployed the difficulties faced in programming that stem from the separation between NDICI-GE (covering the 13 Pacific Island Countries) and DOAG (covering the French OCTs in the Pacific). NDICI-GE also differentiates between ex-ACP ODA-eligible and non-ODA-eligible countries. This situation complicates regional programming for the Pacific region, and it curtails coordination among EU services (such as coordinating calls for proposals across the concerned line and external action DGs, or consultations with thematic units). According to interviewees, action on ocean governance and fisheries, pivotal issues in the Pacific which is common to OCTs covered by DOAG and countries covered by NDICI-GE, is particularly impacted.

EU-external consultations during programming

Document review shows the following:

• With the Geographisation principle and above all the partnership shift under NDICI-GE, consultations have become more necessary than ever with EU-external actors throughout the programming process, from the global to the local levels. The Team Europe approach further requires consultations with EU Member States.

• At global and country level, both EUDs and headquarters (relevant thematic units) entertain relations with international, EU-based and domestic CSOs. EUDs are also expected to consult with Local Authorities, and with the private sector including investors and various types of businesses (supported SMEs, implementing partners) and business associations (confirmed by interviews with NIPACs in the Enlargement region).

• The Framework Financial Agreements have long constituted a solid basis for cooperation with CSOs.

• The Policy Forum for Development meetings have continued to provide a dedicated space for consultations with CSOs. So did the Community of Practice on Peace Mediation Meetings.

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168) Interviews with DGs INTPA, NEAR, AGRI, BUDG, CLIMA, CNECT, DEFIS, ECFIN, ECHO, ENER, ENV, GROW, HOME, JUST, REGIO, TRADE, with Secretariat General and EEAS, with coordination and thematic units in DG INTPA and DG NEAR, FPI, EES (e.g., Elections Observation).

169) E.g., with DGs ENER, GROW, TRADE, CLIMA and ENV.


172) EC, Guidelines for the Programming of the NDICI-GE (2021-2027), 2020. Section 1.3.

IPA III Programming Guidance, ibid.; EC, Guidelines for the programming of the NDICI-GE (2021-2027), 2020. Section 1.3.


175) EEAS and EC Website, EU Community of Practice on Peace Mediation 2023, https://www.eupeacemediation.info/.
• The review of sampled MIPs shows that EUDs have actively engaged in such consultations, as witnessed by the sections on Basis for Programming, and Status of Joint Programming, as well as Team Europe Initiatives, which provide evidence of information gathered from a wide range of stakeholders.

• The validation survey indicates that NDICI-GE helps mobilise and share EU Member States’ knowledge and expertise. 37 out of 60 EUDs agreed strongly or to some extent that the current EFIs help mobilise and share the knowledge and expertise of EU Member States.

• While NDICI-GE envisages MIPs to be based on joint programming strategies for coherence, only 11 out of 89 countries covered by the European Court of Auditors’ assessment of NDICI-GE (179) currently have such strategies.

• Since 2010 when joint programming was first introduced, around 80 joint programming documents have been finalised, according to an interview. Interviews with EU officials, EAMRs and recent strategic evaluation reports suggest that joint programming depend primarily on the nature of relations (more or less collaborative) between the EUD and representations of EU Member States.

• The programming guidelines emphasise the need for EUDs / HQ to implement inclusive programming. It requires programming staff to involve broad and transparent consultations with stakeholders at various levels, including partner country governments, civil society organisations, Local Authorities, the private sector and others, to facilitate dialogue, gather different perspectives and enable stakeholders to contribute meaningfully to the programming process (177).

• The IPA III Programming Guidelines require consultation of a broad range of national and regional actors, at each step of programming. This is particularly the case for Cross-Border Cooperation Programmes (179). Review of proceeds of Sector Working Groups (179) and of the sampled Strategic Responses confirms that this was effectively the case, although at varying level depending on the IPA Beneficiary, with North Macedonia and Montenegro standing out for broader consultations with a large number of CSOs and Local Authorities (180).

• Review of additional guidance notes to NIPACs, and of Strategic Responses (181) shows that under IPA III, as was the case under IPA II, the beneficiaries (NIPACs coordinating) have to take the initiative in designing Action Fiches (except multi-country and cross-border ones).

Consultations with stakeholders further highlight:

• In practice, the EU had held ample external consultations at all levels under the former MFF already, including for programming purposes – but these relations have intensified, become more purpose-oriented, and are more strongly mutualised between EUDs and headquarters (180).

• Headquarters’ relevant units, as well as EUDs have increased their consultation and cooperation efforts with international and regional organisations in the countries, and with DFIs / IFIs (182).

• Headquarters (DG INTPA, DG NEAR, EEAS, FPI) engage intensively with EU Member States representations through relevant Committees as well as informally; and EUDs engage intensively with EU Member States representations (embassies, cooperation agencies) in the country for programming, implementation, and for non-cost activities such as public diplomacy and policy and political dialogue. The introduction of TEIs has given this cooperation a boost, which is labour-intensive for EUDs (184). OPC results confirm this finding: 48 % totally or very much agree that the EU and EU Member States have worked more as a team over the last two years (compared to only 13 % not really agreeing, or not at all. 41 % are neutral).

Document review and consultations additionally showed regional specificities:


(180) IPA III Programming Guidance. Section 8.1, Section 9.


(182) Strategic Responses, Kosovo*, Montenegro, North Macedonia, Serbia, Türkiye: Sections on Consultation Process under each of the five Windows.

(183) Guidance notes to NIPACs (internal documents); Strategic Responses Kosovo*, North Macedonia, Serbia, Türkiye (Sections on key proposed actions under the respective Windows).

(184) Interviews with EUDs and EU Offices, written contributions from EUDs, interviews with national stakeholders (including NIPACs), interviews with Headquarters, targeted consultations with EU Member States, written contributions to OPC from EU Member States, targeted consultations with CSOs and Local Authorities.

(185) Interviews with EUDs, written contributions from EUDs, targeted consultations with EU Member States, written contributions by EU Member States for the OPC, interviews with Geo Desks.
In the post-Cotonou agreements era (185), the EU and its partners in sub-Saharan Africa suppressed the function of National Authorizing Officer, which used to centralise the approval of all EU contracts with the Government, as a ‘one-stop shop.’ Currently, the programmes and decisions are no longer co-signed by the national and regional counterparts. While this decision is not a result of the EFIs, it is concomitant to, and created specific conditions for, the transition to the new EFIs (186):

- The interviews with, and written contributions from EUDs show that negotiating contracts directly with the relevant ministries and public bodies confers more freedom and fluidity to the process by removing the authority of a single officer, and the associated bottleneck.
- The same sources conversely highlight the resulting coordination tasks incumbent upon the EUDs.
- The same sources, corroborated by the validation survey (187), point to overall satisfaction with this setup.

There is evidence of good practices in internal and external coordination from the IPARD programme and the EU relations with China (188):

- Through the IPARD programme, DG AGRI manages approximately 8% of IPA III budget (189). This regional programme operates in Albania, Montenegro, North Macedonia, Serbia and Türkiye, under indirect management by the partner governments, which co-finance it at 25%, with guidance from DG AGRI. IPARD does not include capacity building, but support actions are included within bilateral programming, overseen by EUDs. This requires coordination between DG AGRI and EUDs. In addition, the IPARD programme technical assistance contract funds the placement of DG AGRI staff with the partners in Albania, Montenegro and Serbia, whereas EUDs in Türkiye and North Macedonia have done the same under their own budget lines. This triggers regular exchanges between DG AGRI and DG NEAR, both in the field and in headquarters, as confirmed by interviews with EUDs and with EU staff in headquarters.
- Another good example is the intense coordination taking place with EU Member States and among line DGs, external action services, EEAS, and FPI regarding relations with China (186). The facilities managed by FPI and the new Asia Investment Facility managed by DG INTPA constitute not only entry doors for more intense relations with China, but also concrete yet flexible avenues for consultations and coordination across the EU’s services, and with EU Member States.

Finding 16 Planning and implementation recorded some efficiency gains under the current MFF, but these did not directly result from the new EFIs.

<table>
<thead>
<tr>
<th>Related indicator(s):</th>
<th>I-2.2.2, I-2.2.3</th>
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<tr>
<td>Quality of evidence</td>
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</table>

**General effort to achieve greater efficiency**

Document review and consultations with stakeholders show the following:

- Fewer regulations reduce transaction costs and scope for errors and delays (191). Written EUD contributions confirm greater coherence and complementarity between thematic and geographic programmes.
- As a single instrument, NDICI-GE has allowed some international organisations to simplify their own procedures when dealing with the EU. However, these organisations still complain about the complexity and cumbersomeness of EU implementation procedures (192).

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(186) Interviews with EUDs, EU staff in headquarters, national counterparts.

(187) Disaggregation of EUD validation survey shows that the results from sub-Saharan Africa do not depart from the general trends in terms of assessment of simplification of EU programming and implementation processes, which is assessed positively by 55% respondents.

(188) Interviews with EUDs and EU staff in Headquarters.


(190) Interviews with EU staff in Headquarters and analysis of the Regional MIP for Asia and the Pacific.

(191) EDF, ENI,DCI, IPA II, NDICI-GE, IPA III, DOAG, INSC regulations; Interviews with Headquarters and EUDs; written contributions from EUDs.

(192) Consultations with UN.
• There are some efficiency gains obtained at the level of contracting and implementation, due to the operation of fewer, larger envelopes (193). This is also observed under INSC: the review of financial Dashboard, information communicated in writing by EU Headquarters, shows that the number of INSC Contracts decreased steadily:

![Contracts / AAPs under INSC 2013-2023](image)

• Another factor for some efficiency gains is more competitive selection procedures. On this, in Asia, Pacific and the Americas, the EDF Regulation used to force EUDs to choose regional organisations as implementers before regional programmes were even designed. The choice of implementing partner is now a selective process based on a mature regional Action Document: the implementing partners are better suited, which reduces implementation hurdles and delays (194). The NDICI-GE Regulation corrects this shortfall (195).

• However, the overall effects on efficiency overall have so far been marginal: EFI-level reporting and Financial dashboard show disbursement rates remain broadly unchanged.

• This is confirmed by consultations with the stakeholders: As shown by the survey to EUDs and interviews, respondents are split about the efficiency gains obtained during the current MFF. There is no indication that disbursement rates have increased. However, this perception is probably influenced by the overlap between current MFF programming, and previous MFF implementation: three years into the current MFF, a large proportion of actions being implemented are still disbursing funds from the previous MFF.

• The validation survey shows that 37 % respondents agree that the budgetisation of EDF has led to efficiency gains, 34 % disagree, while 27 % do not know.

• 49 % of respondents of the OPC survey did not agree that access to EU funding had become easier in the past two years, compared to only 19 % of positive views. Negative views are most frequent among NGO respondents (62 %).

• According to the written contributions of the EUDs, while the change in governance (NDICI-GE Committee vs. EFD Committee) has had a positive impact on the approval time, the introduction of NDICI-GE has not added significant flexibility compared to ENI (apart from the Rapid Response Pillar), as any adjustments to programmes still require lengthy procedures. Having a multi-annual framework has not brought significant benefits as programming is still predominantly annual and aligned with negotiated payment forecasts.

• While in the validation survey the majority of EUDs confirmed that NDICI-GE has simplified the programming process, most do not share the view that the workload has been reduced. A clear majority (40 of 60) EUDs agreed strongly or to some extent that the reduced number of regulations under the current EFIs has helped simplifying EU programming and implementation. However, only 7 EUDs agreed that the current EFIs have reduced the amount of work dedicated to communication and consultations with EU Member States for programming and implementation. 16 agreed that the current EFIs have reduced EUDs’ amount of work dedicated to communication and consultations with partners (e.g., governments, civil society, international / regional organisations, etc.) for programming and implementation. 22 EUDs agreed that the current EFIs have reduced workload during programming.

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(193) Interviews with EUDs and EU staff in Headquarters, interviews with CSOs. Written contributions from CSOs.
(194) Interviews with EUDs. Written contributions from EUDs.
for the main national partners involved in the process (e.g., central authorities, civil society, Local Authorities).

- The EUD written contributions and interviews with EU officials on NDICI-GE revealed challenges, such as i) the complex task of managing programming responsibilities under a single instrument with multiple Commission services and other stakeholders resulting in bureaucratic processes and coordination challenges; ii) limited availability of funds for certain sectors or areas of high political relevance, thus challenging even coverage in programming; and iii) a lack of responsiveness to local contexts and needs with limited flexibility to address national policy challenges as the flip side of a streamlined, simplified and unified approach under NDICI-GE.

**Monitoring and reporting**

Document review shows the following:

- The Mid-Term Evaluation of EFIs identified data management, monitoring, evaluation, and ultimately learning, as areas for improvement.
- The EFSD was never evaluated as such and suffers from a lack of intervention evaluations, although learning from this experience was paramount for the design of the EFSD+. The WBIF was evaluated in 2021, after the preparation of the new EFIs' regulations (196).
- The NDICI-GE Regulation improves the M&E setup by establishing a clear link between the monitoring, evaluation and learning, and by further anchoring these functions to accountability and transparency (197). Intrinsically linked to these functions, the NDICI-GE Regulation goes further with explicit provisions for clear monitoring and evaluation mechanisms (198). It foresees robust methodologies and data collection (199).
- The new Global Europe Result Framework (GERF) was introduced after the preparation of the MIPs, so MIPs still refer to the results framework of the previous MFF, but both frameworks have many indicators in common. The GERF includes new monitoring indicators and reporting requirements for NDICI-GE. The GERF is part of the so-called Global Europe Performance Monitoring System (GEPMS), which seeks to create a single coherent performance monitoring system for EU external action, addressing some of the weaknesses of the previous framework (EURF) introduced in 2018 to monitor results under the MFF 2014-2021 (200). Next to the updated, time-bound GERF used for accountability purpose, GEPMS includes also a more comprehensive results framework for communication, management and learning needs and an IT platform (OPSYS) for managing logframes, collecting data, and conducting assessments (201).
- The IPA III monitoring framework is based on Annex IV of the IPA III Regulation. Over a half of the key performance indicators in this annex directly concern global challenges, which equips the instrument soundly to contribute to global monitoring. These indicators are not the exact mirror of the accession negotiation Chapters and Clusters, but they reflect them (202). Likewise, the five Windows of the IPA III Programming Framework, and the attached indicators, do not exactly mirror the accession Clusters, but all Clusters are represented (203). In practice, the EU applies the IPA III Results Framework (204). Launched in 2022, it counts 750 indicators serving 170 objectives.
- EAMRs and AOSDs review show that the separate reporting formats by INTPA and NEAR (EAMRs) versus FPI (AOSDs) are not very conducive to monitor the complementarity between actions. EAMRs, for example, hardly mention any collaboration with FPI.

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(199) “The indicators used to measure progress should be in line with the SDGs and be clear, relevant and have robust methodologies. The data for the indicators should be readily available and of a good quality.” EU, Regulation (EU) 2021 / 947 establishing the NDICI-GE, 2021. Recital 19.
(200) EC, Launching the Global Europe Performance Monitoring System containing a Revised Global Europe Results Framework, 2022. Section 3.
(201) Ibid. Sections 3, 4.
(204) EC, Commission Staff working Document – The Instrument for Pre-Accession assistance (IPA III) Results Framework, 2022. Section 3.
Box 1  Compared practices: Global Challenges, FPI, EFSD+ and IPA III

- The Global Challenges Thematic Concept Note calls for a limited set of expected results at impact, outcome and output levels, as well as indicators. It demands indicators, with data sources, baseline and targets to ensure a coherent framework for future monitoring and evaluation. Its list of indicators has been agreed on by DG INTPA, DG NEAR, EEAS and FPI Services. Yet there is evidence that markers are not accurately applied, despite guidance (205).
- A new composite indicator enables FPI to monitor the conflict sensitivity of actions and stakeholder analyses. The uptake is not expected to encounter dilution or resistance, due to the relatively small number of long-standing implementing partners (206).
- The NDICI-GE Regulation monitoring and reporting requirements include the EFSD+, which commits the financial partners and foster joint learning at the level of specific facilities (e.g., WBIF). The ReMF serves this ambition with a monitoring, reporting and evaluation tool, which is also aligned with the IPA III Regulation. While this is positive from an accountability perspective, it is not fully functional yet, chiefly because the monitoring systems of the DFIs / IFIs are not aligned with the ReMF, which undermines EU-relevant data provision (207). Interviewees from DFIs / IFIs also underscored the risk that reporting requirements may be too onerous for local financial partners, which could jeopardise the deployment of guarantee schemes.
- Under IPA III, the EU should differentiate assistance based on performance, in particular as regards their commitment to and progress in implementing reforms, as well as according to the needs (208). But its reporting and monitoring are not coordinated enough to bring accession negotiations, programming of granting and investment, and implementation closer together: as a result, the EU cannot satisfactorily seize itself of the opportunity (209). Additionally, the EU and may modulate assistance in case of significant regression or persistent lack of progress on the Fundamentals – following a decision substantiated on the basis of the IPA III Programming Framework (210). This provision has not been activated so far under the current MFF.
- The INSC Results framework is presented in the INSC Multiannual Indicative Programme 2021-2027 in a dedicated Annex on Performance Indicators. These indicators provide continuity with the results framework of INSC under the previous MFF.

Box 2  Targets and markers in monitoring

- Targets and markers incentivise reporting on cross-cutting issues, make these issues more visible, and provide avenues to measure mainstreaming, as highlighted by the EU Indo-Pacific Strategy.
- Targets create additional work for the EU and its partners, whereas their added value for programming and monitoring is limited because it proved an unreliable data source: data encoding in the EU’s systems does not reflect the targets, nor does it offer the level of granularity necessary to adequately monitor them. For instance, democracy actions are monitored through the DAC Code on ‘good governance’, which includes much broader issues, thus over-representing the number of actions and the funding dedicated to the target (211).
- Target reporting can also overshadow important qualitative information on cross-cutting issues: for instance, human rights due diligence is absent from monitoring and reporting, despite human rights being a cross-cutting issue.
- Mainstreaming occurred in non-targeted areas: Kenya and Madagascar MIPs feature digitalisation as a cross-cutting issue, despite it not being a cross-cutting priority and not having a target.

Finding 17 The EU’s efforts to reduce transaction costs have heightened barriers to partnership for CSOs and Local Authorities.

<table>
<thead>
<tr>
<th>Related indicator(s): I-2.2.2</th>
<th>Quality of evidence</th>
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<tbody>
<tr>
<td>CSOs</td>
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Document review and stakeholder consultations show intense dialogue with CSOs:

- Review of CSO Roadmaps in sampled countries shows that consultation with CSOs is always performed by EUDs, albeit at varying levels. This is confirmed by EUD interviews and written contributions: many EUDs (Nepal, Serbia, Haiti, Moldova, Morocco, among others) reported regular and productive dialogue with CSOs, which they promote as watchdogs, policy actors, and programming partners.

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(205) Interviews with EU staff in headquarters; Statistical Dashboard review.
(207) Interview with DFIs / IFIs, EU staff in Headquarters.
(208) IPA III Regulation. Recital 32, Art. 8.3.
(209) Interview with DFIs, EU staff in Headquarters, CSOs, NIPACs.
(210) Source: Interviews with headquarters, CSOs, international organisations. See also: Sabourin, A. and Jones, A., More than targets: How the EU promotes democracy, human rights and gender equality through Global Europe and beyond. ECDPM Discussion paper 337, 2023; EC, Mid-Term Evaluation of the implementation of the EU Gender Action Plan III (2021-2025), 2023.
• Consultation does not always mean co-creation, and the impact of these consultations on programming is uneven. Within EUDs, 20 % CSO Focal Points who participated in the survey commissioned by the CSO thematic programme in 2023 found that consultations with CSOs had an impact on EU policy and strategy documents. Only 6 % found that there was an impact on the design of EU programmes.

Document review and stakeholder consultations also show that CSOs’ access to EU funding remains a challenge.

• Three quarters of the budget execution of the thematic programmes on CSOs and Human Rights and Democracy are country-level actions implemented through calls in the EUDs (212). Grants and sub-grants also remain the avenue for CSOs to access EU funding (213), in a context where support to CSOs, particularly local ones, is key to countering democratic backsliding (214).

• But access to these grants is costly for the CSOs. Interviews with international and country-level CSOs on all continents reveal that they continue to find EU rules and procedures constraining, and difficult to understand, especially for ‘new comer’ CSOs.

• The current Financial Regulation does not allow multi-annual operating grants with CSOs (215). According to interviews with CSOs, this complicates access to EU funding, as it requires multiple application processes, which are costly. In addition, DG INTPA no longer operates their annual calls under the CSO thematic programme (interview with Thematic Unit).

• Options exist under the new NDICI-GE Regulation to counterbalance the trend (NDICI-GE 27.1 and 27.3). But potential beneficiaries and applicants among CSOs, especially at country and grassroot level, are not conversant with requirements or opportunities afforded under the instruments (216). This is confirmed by the EUD validation survey: only 3.7 % respondents consider that CSOs and Local Authorities fully understand the EFIs. This was noted already by the 2017 MTE of EIDHR and is confirmed by interviews with EUDs, and by targeted consultations with CSOs-Local Authorities.

• In sub-Saharan Africa, EUDs recorded a simpler set of implementation modalities, which leads to large envelopes often implemented by EU Member States development agencies rather than CSOs. Yet, experience has shown that implementation by EU Member States agencies does not necessarily lead to efficiency, as evidenced by document review (217), and interviews with EUDs and national CSOs.

• The Rapid Response Pillar does not easily reach CSOs beyond a limited number of international or EU-based CSOs: it did provide funding to 70 CSOs with grants ranging from EUR 500 000 to EUR 21 million; however, out of these, 64 are based in donor countries, and only 6 in partner countries (218).

• Overall, CSOs’ access to funding has not become easier under the current MFF. The EUDs validation confirms this assessment: 71 % EU respondents strongly (20 %) or somewhat (51 %) disagree that it has become easier, and none strongly agrees that it has become easier – the lowest results in the series of questions on improvements resulting from the new EFIs. OPC results show that 50 % respondents were not positive about improved access to funding and only 19 % were positive – negative answers mostly from CSOs.

**JC 2.3. Responsiveness to crises and emerging challenges at local, country, regional and global level**

The analysis under this JC has strongly relied on documentary sources. Interviews, targeted consultations and surveys have allowed to confirm and enrich the findings emerging from document review. The main sources used are summarised in the table below.

**Table 7 Main sources of evidence for JC 2.3**

<table>
<thead>
<tr>
<th>Main sources – documents</th>
<th>Main sources – surveys</th>
<th>Main sources – interviews &amp; targeted consultations</th>
<th>Other sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>EFI regulations &amp; programming guidelines, e.g., NDICI-GE Regulation</td>
<td>OPC written contributions</td>
<td>Interviews: EU HQ, EUDs, IOs and international CSOs, in-country stakeholders</td>
<td>Mapping of EU spending actions (Dashboards)</td>
</tr>
</tbody>
</table>

(212) MIP Human Rights and Democracy; MIP CSOs; interviews with thematic units; EAMRs – Unpublished internal EC document.

(213) Interviews with international and local CSOs, EUDs, EU staff in Headquarters.


(216) Interviews with EU staff in Headquarters, national CSOs across the regions, and international CSOs.


Finding 18 The new instruments adequately responded to the lessons learned during the previous MFF, with a combination of old and new flexibility features.

**Related indicator(s):** I-2.3.1, I-2.3.2, I-2.3.3, I-2.3.4, I-2.3.5

**Quality of evidence**

### New and old flexibility features

Document review shows the following:

- The 2017 MTE of EFIs noted the lack of flexibility to respond to emerging needs, challenges and crises as an area for improvement \(^{(219)}\). Responding to this concern, flexibility under NDICI-GE has been enhanced in several ways \(^{(220)}\). Specific flexibilities include:
  - Removal of the obstacles linked to the transfer of allocations between different instruments.
  - Waiver of regular visa routes for exceptional assistance measures under EUR 20 million; adoption and amendments to existing measures in case of urgency, crises or immediate threats.

- In addition, pre-existing flexibilities continue to apply in NDICI-GE \(^{(221)}\):
  - The ability to carry over unused funds is a feature borrowed from the European Development Fund (EDF), which gives greater room for manoeuvre.
  - NDICI-GE also offers possibility of implementing measures up to certain financial ceilings without an implementing decision.

### Rapid Response Pillar and Cushion

Document review shows the following:

- In addition to the above, the NDICI-GE Regulation introduces two novel tools which further strengthen the EU’s capacity to address unexpected situations \(^{(222)}\):
  - Establishment of an Emerging Needs and Challenges Cushion
  - Inclusion of a Rapid-Response Pillar (RRP), along with the Geographic and Thematic Pillars.

- The NDICI-GE Emerging Challenges and Priorities Cushion provides a non-programmable envelope to be channelled through the Geographic Pillar, the Thematic Pillar, or the Rapid Response Pillar to respond to a broad range of unforeseen situations, needs and ambitions \(^{(223)}\). The main usage of the

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\(^{(220)}\) EU, Regulation (EU) 2021/947 establishing the NDICI-GE, 2021. Art. 4-4, Art. 4-5, Art. 8-8, Art. 25, Annex IV.


Cushion as mandated by the NDICI-GE Regulation is to respond to unforeseen circumstances, new needs or emerging challenges, and to promote new EU-led or international initiatives or priorities (224).

- The NDICI-GE Regulation (225) also foresees specific uses for the Cushion, in the form of top-ups for specific global programmes to respond to threats to human rights, democracy, and civil society, and to global challenges: EUR 200 million for the Human Rights and Democracy thematic programme, EUR 200 million for the Civil Society Organisations thematic programme, and EUR 600 million for the Global Challenges thematic programme.
- The RRP, is a pillar that may address a wide variety of situations through three envelopes (crisis response, resilience, and foreign policy needs) (226), each with a specific mandate.
- The Resilience Envelope has been allotted in its entirety to ‘Support to inclusive quality education for refugees in Türkiye’ (EUR 530 million)
- The Crisis response envelope has been allotted to a variety of crisis responses worldwide (EUR 498 million).
- The foreign policy needs envelope (EUR 42 million) has been allotted (227) to long-term (228), urgent (229), or sensitive (230) actions that could not be addressed by geographic programming, and that are in line with the EU’s emerging foreign policy priorities.

 Consultations with stakeholders further highlight:

- The Cushion revealed its strategic importance from the onset of the MFF. The interviewees celebrated the novelty of the cushion, which provides avenues for a much-needed unified response across the NDICI-GE pillars. The cushion was for instance used for much-needed top-ups for thematic programmes (CSOs, Human rights and Democracy), although confirmation of these mobilizations came late (231).
- Building on the informal experience of FPI under the previous MFF, the use of the RRP explicitly requires anticipation and internal coordination for follow-up to rapid response actions. Interviewees appreciated not only the content of the Regulation in this regard, which prevents gaps and interruptions, and pushes the staff to think long-term within a flexible response. They also valued the approach of formalising an existing, successful good practice. Decision making processes on the RRP relied on harmonised understanding and on intense consultation and coordination (232).

Finding 19 During the first half of the MFF, these features allowed strong and quick reaction to high-priority issues and crises, while testing the limits of the EFIs: COVID-19, the Russian war of aggression, and the refugee-migration crisis.

**Related indicator(s):** I-2.3.2, I-2.3.3

**Quality of evidence**

Response to the COVID-19 pandemic

Document review and stakeholder consultations show for example:

- Taken together, the Cushion mobilisations for COVAX. Vaccination and global health, Roll-out of vaccines, and Vaccine production in Africa, proved fast and visible, within a proper Team Europe approach (233).
- The EU supported COVAX (a Gavi-managed facility) through both grants and guarantees with 400 million of grant mobilising funds from the Cushion, including EUR 300 million top-up to the Global Challenges thematic programme budget line, EUR 24 million to the West Africa geographic programme, EUR 24 million for East and Central Africa under geographic programming, EUR 13 million for the South Africa and Indian Ocean geographic programming, EUR 20 million for the South Neighbourhood geographic programme, EUR 10 million for the East Neighbourhood geographic programme, EUR 4 million for the South and East Asia geographic programme, EUR 3 million for the

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(227) A portion of the FPN envelope of the RRP (almost EUR 14 million) is confidential data. Statistical Dashboard, extractions from March 2023.
(228) Connectivity, public diplomacy, various dialogue platforms. Statistical Dashboard, extractions from March 2023.
(231) Interviews with EU staff in Headquarters.
(232) Interviews with EU staff in Headquarters and EUDs. EUDs’ written contributions.
(233) Interviews with EU Headquarters, EUDs, CSOs, national stakeholders. Targeted consultations with the UN.
Mid East and Central Asia geographic programme, EUR 2 million Americas, 1 million in the Pacific, 1 million in the Caribbean (234).

- Additionally, the Cushion mobilised EUR 45 million for Support to vaccines and global health, and EUR 75 million for rollout of vaccines, and EUR 400 million for vaccine production in Africa. The latter categories go beyond COVID-19 vaccines, also encompassing other vaccines and global health issues (235).
- According to evaluation reports, interviews with EUD and written contributions by EUDs, in response to the Pandemic, the EU HQ quickly increased flexibility for EUDs to re-orient programmes, use flexible procurement procedures, and waive budget support performance targets, amongst others. It also encouraged a Team Europe coordinated response. According to EU interviewees, this enabled EUDs to respond immediately and effectively to the crisis and support partner countries' immediate needs of support. Interlocutors stated that this was highly welcomed by governments throughout Latin America, Asia and the Pacific.
- The validation survey revealed that only 20 EUDs strongly or somewhat agree that the current EFIs help to increase the availability of funding for emerging needs and challenges in my country / region (through e.g., the cushion, rapid response). 29 EUDs agree that overall levels of flexibility have increased compared to previous MFF; and 22 agree that the current EFIs allow to effectively support actions along the humanitarian-development-peace nexus.

Response to Russia’s war of aggression against Ukraine

Document review and stakeholder consultations show for example:

- Since the start of Russia’s war of aggression against Ukraine in February 2022, the EU has supported Ukraine with an unprecedented package of measures amounting to EUR 80.9 billion (238). In addition to NDICI-GE funding, the EU’s response has drawn on EU humanitarian aid and the Civil Protection Mechanism to address humanitarian needs. EUR 25.2 million of MFA was transferred in the last two years to ensure economic stabilisation and military support was provided drawing on the resources from the off-budget European Peace Facility (EPF) and the CFSP chapter under the EU budget, as well direct contributions from the EU Member States. Access to EU programmes (237) and trade measures (238) have also been part of the EU’s armoury to strengthen the country’s economic resilience.

Figure 3 EU support to Ukraine 2022-2023 (239)
• The Cushion has been particularly mobilised to respond to this Crisis, including in particular through (249):
  o Interest rate subsidies for two MFA actions (EUR 819 million)
  o Provisioning for a re-purposed legacy European Investment Bank loan under the External Lending Mandate (EUR 967 million)

• Investment-related Cushion mobilisations for Ukraine thus total EUR 1,786 million. Among the two Macro-Financial Assistance packages for Ukraine funded by the Cushion, one subsidises the interest rates to preserve the concessionality of legacy loans contracted by Ukraine prior to the current MFF, and for which interest rates have skyrocketed due to the war (241). Another mobilisation concerns additional provisioning for guarantees of EIB loans contracted before the current MFF, and currently repurposed for resilience (e.g., ‘solidarity lanes’ for agricultural crop trade, infrastructure repairs) and reconstruction. The mobilisation covers the difference between the 9 % regular guarantee provisioning rate (242), and the 70 % provisioning rate now applicable for Ukraine, in view of the increased risk. The initial 9 % remain covered by the geographic budget line (243).

• In addition to direct support to Ukraine, support to Moldova in response to Russia’s war of aggression against Ukraine includes MFA (EUR 220 million in the form of loans and up to EUR 75 million in grants), EIB / EBRD loans to finance investment under the EIP (EUR 404.5 million), budget support (to pay for energy bills), which draws from three years of Eastern Neighbourhood allocations (EUR 240 million) and bilateral assistance to support the economy and reforms in the energy and justice sectors. Additional funding is provided from humanitarian assistance, CPM, CSDP, CFSP and EPF (244).

• To mitigate the socioeconomic consequences of the war in the Southern Neighbourhood (EUR 225 million Food and Resilience Facility). In 2022, EUR 270 million was committed under the Neighbourhood geographic programme in support of Syrian refugees and host communities in Jordan, Lebanon and Syria (245).

Response to the protracted refugee and migration crises

Document review and stakeholder consultations show for example:

• Cushion mobilisations concerning migration and refugees total EUR 1 81 million (246). Pre-existing commitments were covered by the Cushion for support to refugees and host communities in Türkiye, Jordan, Lebanon, Iraq after the end of the Facility for Refugees in Türkiye (FRIT) and the Madad Trust Fund (247).

• In addition, RRP allocations concerning migration and refugees total EUR 572,5 million. This includes EUR 15 million in support to Moldova, linked to the influx of refugees from Ukraine, which is also reported above under the calculation of allocations linked to Russia’s war of aggression against Ukraine. The entire Resilience envelope (EUR 530 million) was allocated for Türkiye – needs of Syrian refugees (248).

• Regarding Türkiye, it has been argued that some aspects of the support provided could have been anticipated, and therefore covered by the geographic budget (in this case IPA III). Some interviewees representing different and complementary perspectives explained that parts of these mobilisations have limited outreach for refugees themselves, whereas they provide support to communities in some
regions of Türkiye (249). Some interviewees concluded that this was not entirely coherent with the EC decisions regarding the cancellation of some actions in Türkiye (250).

- In the Crisis Response line, five allocations totalling close to EUR 30 million are dedicated to actions directly or indirectly in favour of return within Syria (251). Some interviewees in Headquarters questioned whether the RRP was the best-suited tool to address this protracted crisis, whereas geographic programming might have been able to plan for it.

**Geographic imbalance**

Document review and stakeholder consultations show for example:

- As presented above, the EU has extensively used the non-programmable tools of NDICI-GE to respond to a limited number of exceptional crises: the needs of refugees (and local communities) in Türkiye and the Middle-East, and Russia’s war of aggression against Ukraine. This has tilted the distribution of the Rapid Response Pillar, and of the Cushion.

- Cushion mobilisations totalled EUR 7 388 million, with a rather even distribution between the EU’s Enlargement and Neighbourhood regions, and the rest of the world and global mobilisations (252).

### Table 8  Distribution of Cushion mobilisations during the period 2021-2023 (253)

<table>
<thead>
<tr>
<th>Mobilisation title</th>
<th>Amount (EUR Million)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ukraine Provisioning EIB repurposed loans</td>
<td>967</td>
</tr>
<tr>
<td>Syrian refugees package Turkey</td>
<td>921</td>
</tr>
<tr>
<td>Ukraine Interest Rate Subsidy</td>
<td>819</td>
</tr>
<tr>
<td>Ukraine Pledge Fast Recovery</td>
<td>305</td>
</tr>
<tr>
<td>Ukraine Pledge 8 / 4 / 22</td>
<td>301</td>
</tr>
<tr>
<td>Syrian refugee package – Syria, Jordan, Lebanon envelope</td>
<td>288</td>
</tr>
<tr>
<td>Ukraine Pledge 5 / 5 / 22</td>
<td>200</td>
</tr>
<tr>
<td>Migration North Africa</td>
<td>50</td>
</tr>
<tr>
<td>COVAX – Neighbourhood envelope</td>
<td>30</td>
</tr>
<tr>
<td><strong>Total – Mobilisations in Enlargement and Neighbourhood regions</strong></td>
<td>3 881</td>
</tr>
<tr>
<td>Global gateway</td>
<td>750</td>
</tr>
<tr>
<td>Vaccine production Africa</td>
<td>400</td>
</tr>
<tr>
<td>COVAX – Rest of the world envelope</td>
<td>70</td>
</tr>
<tr>
<td>Syrian refugee package – Iraq envelope</td>
<td>22</td>
</tr>
<tr>
<td><strong>Total – Rest of the world</strong></td>
<td>1 242</td>
</tr>
<tr>
<td>Top-up Global challenges</td>
<td>600</td>
</tr>
<tr>
<td>Support to vaccination and global health</td>
<td>450</td>
</tr>
<tr>
<td>COVAX – Global Challenges envelope</td>
<td>300</td>
</tr>
<tr>
<td>Global partnership for education</td>
<td>225</td>
</tr>
<tr>
<td>Top-up Human Rights and Democracy</td>
<td>200</td>
</tr>
<tr>
<td>Top-up CSOs</td>
<td>200</td>
</tr>
<tr>
<td>Union secure connectivity</td>
<td>150</td>
</tr>
<tr>
<td>Support roll-out of vaccines</td>
<td>75</td>
</tr>
<tr>
<td>GFATM seventh replenishment</td>
<td>65</td>
</tr>
<tr>
<td><strong>Total – Global</strong></td>
<td>2 265</td>
</tr>
</tbody>
</table>

(249) Interviews with CSOs, EUDs, Headquarters.
(251) Support for Stabilisation and Reintegration in North-Eastern Syria, EU 18.5 million; Create Safer Communities and enable safe and sustainable returns, encouraging stabilization and early recovery in Ar-Raqqaa, EUR 4.5 million; Humanitarian mine action response in North East Syria, EUR 2.3 million; Resilient futures: protection and education for children and youth in North East Syria, EUR 2.5 million; Social reintegration and resilience to combat radicalization in North East Syria, Phase II, EUR 2 million.
(252) EU Parliament, Draft Opinion of the Committee on Budgets for the Committee on Foreign Affairs and the Committee on Development on the implementation of the NDICI-GE, 2023 / 2029(INI), 2023.
(253) EU Parliament, Draft Opinion of the Committee on Budgets for the Committee on Foreign Affairs and the Committee on Development on the implementation of the NDICI-GE, 2023 / 2029(INI), 2023.
In contrast, the RRP has been used predominantly in the Enlargement and Neighbourhood regions. Under the RRP, the available financial data (some allocations do not indicate geographic data) indicate that regions other than the Enlargement and Neighbourhood have received 31 different allocations from the Crisis Response line of the RRP, in the range of EUR 0.5 to 9.5 million, totalling about EUR 91 million, far behind the allocations for the Neighbourhood and Enlargement regions.254

Table 9  Geographic distribution of Commitments under the RRP255

<table>
<thead>
<tr>
<th>RRP Commitments</th>
<th>Amount (EUR Million)256</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resilience line Enlargement + Neighbourhood</td>
<td>530</td>
</tr>
<tr>
<td>Crisis Response Line Enlargement + Neighbourhood</td>
<td>216</td>
</tr>
<tr>
<td>FPN line Enlargement + Neighbourhood</td>
<td>0</td>
</tr>
<tr>
<td>Total Enlargement + Neighbourhood</td>
<td>746</td>
</tr>
<tr>
<td>Resilience line Rest of the world</td>
<td>0</td>
</tr>
<tr>
<td>Crisis Response line Rest of the world</td>
<td>253</td>
</tr>
<tr>
<td>FPN line Rest of the world</td>
<td>4</td>
</tr>
<tr>
<td>Total Rest of the world</td>
<td>257</td>
</tr>
<tr>
<td>Crisis Response line Global or non-specified</td>
<td>29</td>
</tr>
<tr>
<td>Non specified / global</td>
<td>39</td>
</tr>
<tr>
<td>Total global or not specified</td>
<td>68</td>
</tr>
<tr>
<td>Total RRP allocations</td>
<td>1071</td>
</tr>
</tbody>
</table>

Finding 20 In the context of multiple and protracted crises, the existing flexibilities are overstretched.

Related indicator(s): I-2.3.4, I-2.3.5  Quality of evidence

Financial constraints

Document review and stakeholder consultations show for example:

- The first half of the MFF has witnessed a depletion of the Cushion. The Cushion has been allotted with EUR 9.31 billion for the current MFF257, of which 79% was committed or earmarked to date258. The foreseen top-ups for thematic programmes have all been fully mobilised – although the confirmation regarding the Human Rights and Democracy and CSO programmes came late in the first half of the current MFF. This leaves the Cushion of with 21% of its initially planned resources for the period 2024-2027.
- In contrast, the RRP has been allotted with EUR 3 183 million259, out of which approximately 32% have been allocated to date.
- Consultations with stakeholders evidenced a general concern over the multiplication of severe and wide-spread crises, and the EU’s ability to respond to them, especially from the financial point of view, in view of the depletion of the Cushion.
- The EUDs display particular concern about response to a wide variety of crises. The validation survey revealed that only 20 EUDs outside the Neighbourhood strongly or somewhat agree that the current EFIs help to increase the availability of funding for emerging needs and challenges in the country/region (through e.g., the cushion, rapid response).
- Responding to the role played by Russia’s war of aggression against Ukraine in the depletion of the Cushion, the EC has proposed a new Facility for Ukraine: the draft Regulation has been proposed to...

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254 Statistical Dashboard, data extractions from March 2023.
255 Statistical Dashboard, data extractions from March 2023.
256 Rounded to the closest unit.
257 Refers to Budget Position 14.02.032 “Support to inclusive quality education for refugees in Türkiye.”
259 Refers to Budget Position 14.02.031 ‘Crisis Response.’
260 Refers to Budget Position 14.02.031 ‘Crisis Response.’
262 EU Parliament, Draft Opinion of the Committee on Budgets for the Committee on Foreign Affairs and the Committee on Development on the implementation of the NDICI-GE, 2023/2029(INI), 2023.
264 Interviews EU staff in Headquarters, targeted consultations with EU Member States, UN, CSOs, written contributions from EUDs, written contributions to OPC from EU Member States.
the European Council and the European Parliament in June 2023. It may be adopted once an agreement is reached on the revision of the MFF, which is – as of November 2023 – being negotiated between the EC, the EP and the European Council.

Political and institutional constraints

Document review and stakeholder consultations show for example:

- As a result of prioritisation in the use of the Cushion and the RRP, and of the financial and political limitations faced in geographic programming, some crises are under-served, as well as some emerging or continuing threats (265). For instance, the food and grain crisis, situation of IDPs and refugees in the Sahel and Myanmar have received less funding and attention than the COVID-19 crisis, migration and refugee crises, or Russia’s war of aggression against Ukraine (266). Despite the top-ups provided for by the Cushion as envisaged in the NDICI-GE Regulation (267), this is also the case of threats against human rights and democracy, albeit to a smaller extent (268).

Box 3 Energy package in the Western Balkans: a highly flexible response at the cost of regular programming and predictability

In 2022, following Russia’s war of aggression against Ukraine, the Western Balkans faced a crisis linked to the increased energy prices. Within weeks, the EU responded with a sizeable energy package: EUR 500 million in immediate budget support grants, to be followed by another EUR 500 million in investment loans through the WBIF (269). All EU interviewees concurred that the rapidity and the magnitude of the reaction was unprecedented in IPA cooperation.

This experience demonstrated the unprecedented flexibility of IPA III, as this package exclusively used IPA III continuous programming: it did not mobilise additional instrument funding, nor the NDICI-Cushion, nor the RRP (both of which can cover the Enlargement region) (270). Instead, the EU dedicated almost the entire 2023 annual action programme in each of the six Western Balkans Beneficiaries to this package.

This quick reaction came at the cost of one year of strategic focus and performance-based programming: the entire annual bilateral programming for 2023 was postponed to 2024 in all six Beneficiaries, with unconditional disbursements, regardless of uneven reform performance (271). This situation compounded the already protracted deployment of the new instrument, and created a precedent of divergence from the spirit of the Regulation which could backfire: the perception expressed in all interviews with national stakeholders is that important decisions on assistance are more political than merit-based. What is more, the benefit of the measure is uncertain: the majority of country-level interviewees (national authorities and CSOs) as well as some EUD officials, downplay the impact of this package. For instance, in Serbia the energy package represents only a small fraction of energy purchases.

EQ3 – EU-internal and external interlinkages (incl. EU added value)

JC 3.1 Facilitation of EU-internal linkages and strengthening coherence

The analysis under this JC has relied on a variety of sources of information. In addition to the documentary review, the analysis built on the mapping of EU spending actions as well as interviews, targeted consultations and surveys. The main sources used are summarised in the table below.

Table 10 Main sources of evidence for JC 3.1

<table>
<thead>
<tr>
<th>Main sources – documents</th>
<th>Main sources – surveys</th>
<th>Main sources – interviews &amp; targeted consultations</th>
<th>Other sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>• EFI regulations &amp; programming guidelines, e.g., NDICI-GE Regulation; IPA III Regulation and Programming Framework</td>
<td>• OPC survey</td>
<td>• Interviews: EU HQ, EUDs, IOs and international CSOs, in-country stakeholders (authorities, CSOs), European Development Financial Institutions / IFIs and EU Member States</td>
<td>• Mapping of EU spending actions</td>
</tr>
<tr>
<td>• Overarching policies, e.g., New Consensus on Development</td>
<td>• EUD written contributions</td>
<td></td>
<td>• EU data from M&amp;E systems and related reporting</td>
</tr>
<tr>
<td></td>
<td>• In-country stakeholder survey</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(265) Interviews with DG INTPA, DG NEAR, EUDs, EUDs written contributions, written contributions from OPC respondents, interviews with international CSOs, targeted consultations with UN.

(266) Interviews with EUDs, written contributions by OPC respondents.


(269) AAPs for all beneficiaries 2021, 2022, 2023.


(271) Interviews with EUDs, headquarters, national CSOs, NIPACs.
Finding 21 The intention to strengthen the internal coherence of the new EFIs (NDICI-GE, IPA III, and DOAG) is evident and initial experiences show strengthened coherence and synergies between geographic and thematic funding. The termination of the PI has resulted in new lessons which still need to be fully absorbed across the EU services.

<table>
<thead>
<tr>
<th>Related indicator(s): I-3.1.1, I-3.1.3</th>
<th>Quality of evidence</th>
</tr>
</thead>
</table>

NDICI-GE internal coherence and synergies

Document review and stakeholder interviews show:

- Despite the benefits of having a unified regulatory framework, coordination challenges remain given the division of responsibilities within the EC. Drafting the country MIPs is a joint work between the EUD and the Headquarters() which are also responsible for the drafting of thematic and regional / multi-country MIPs (272). Experience from the previous period shows the difficulty of ensuring operational links or synergies between the bilateral and regional levels (273). A high-level of coordination is also required between different EC services to implement programmes in a coherent way and ensure synergies, i.e., between DG INTPA (274), DG NEAR, FPI (275) and DG Regio (276). However, some EC interviewees noted that each service had its own approaches and interests, which sometimes made such coordination particularly difficult, and that not everyone was convinced of the benefits of a single instrument.

- A review of MIPs shows a good level of complementarity between the geographic MIPs and RRP short-term actions in sub-Saharan Africa. Complementary to country and regional funding, approx. 25 African countries have benefited from the RRP / crises response window so far under the current MFF, mostly in relation to civilian peace-building, conflict prevention and resolution.

- Interviews with EU staff at HQ show that coordination has increased between FPI, INTPA and NEAR due to more systematic coordination mechanisms as required by the move to Geographisation, and via task forces and working groups on specific topics like security sector reform (SSR) and climate security.

- According to the validation survey, the coherence of current EFIs has improved, with more than half of respondents (59 %, or 67 % not considering the option do not know) agree that NDICI-GE ensures better coherence and complementarity between geographic, thematic and Rapid Response pillars.

(274) Responsible for three of the four thematic programmes and for two types of rapid response actions i.e., those related to resilience and those linking humanitarian and development actions (the latter in cooperation with DG NEAR).
(275) Responsible for Peace, Stability and Conflict Prevention programmes under the thematic pillar and two of the three types of rapid response actions i.e., Crisis response and conflict prevention and Foreign policy needs and priorities under the rapid response pillar.
(276) Responsible for the cross-border cooperation programmes with Neighbourhood and Enlargement partner countries.
• There is evidence from MIP reviews and interviews with EU staff at EUD level, that the choice of interventions regarding CSOs and human rights for the five sub-Saharan sample countries were made in a similar way as under the 11th EDF, when DCI CSO-LA and EIDHR were used to promote politically sensitive actions, including human rights.
• The 2017 MTE of EDF (277) found good level coherence and complementary between EDF and other EFIs, between DCI CSO-LA and EIDHR thematic programmes, and between thematic and country programmes.
• Interviewees (EU staff at HQ level) concur that, with fewer instruments, the whole-of-Commission approach has become more tangible.
• Already during the negotiation of the current MFF, research papers have noted that cohesion and coordination between support to Local Authorities and other aspects of the portfolio is likely to decrease with the abandonment of Local Authorities as direct beneficiaries of the thematic programme (278).
• Similarly, as noted already as far back as 2009 in the Mid-term review of the 2007-2010 Programme Strategies and later again in 2014 in the DCI GPGC MIP for 2014-2017 (279), the issue of coherence of the EFIs, particularly between the geographic and thematic programmes, is key and goes beyond the thematic programme on Global Challenges. As evidenced from the NDICI-GE Regulation, the intention of the new EFIs to facilitate and incentivise coherence and synergies across instruments and with internal policies and programmes is clearly set out (280).
• The NDICI-GE Programming Guidelines (281) specify particular areas, such as Green Deal and digital transformation, in which EU external and internal policies should converge on the ‘overarching policy priorities’ of the Commission: Green Deal, digital transformation and data technologies, alliances for sustainable growth and decent jobs (including trade and investment), better management and governance of migration, migration partnerships, governance and peace and security (including human rights, democracy and the rule of law).

Complementarity and coherence between country and regional support

Document review and stakeholder consultations show:
• The Iraq 2021 EAMR (282) notes that the policy and programming for advancing human development in Iraq is supported by strong coordination and complementarity between the different EU funding instruments, most notably DCI / NDICI-GE bilateral funding and the EUTF Madad.
• The Honduras MIP 2021-2027 specifically mentions the coherence of bilateral support with support to regional economic integration initiatives and global thematic programmes (Democracy and Human Rights and Civil society).
• The country MIPs for Kenya, Senegal, Chad and Somalia (MIPs 2021-2027) feature references to regional initiatives and the regional MIP (283) shows the ambition to play a pivotal role in building on country programmes, supporting regional initiatives and linking up with global initiatives.
• Interviews with EU staff at HQ and EUDs show that linkages between the regional level and the country level (in line with the subsidiarity principle) are poorly applied so far. According to the interviewees, because of the size of the regional MIP and very short timelines to complete the MIPs, the search for complementarity has not been systematic and comprehensible, albeit some exceptions were found.
• One such exception is the regional EU support in the Horn of Africa: Under the 11th EDF, a dedicated window was established to support Horn of Africa initiatives under the EUTF; the regional envelop for Eastern Africa, Southern Africa and the Indian Ocean was also used to support specific initiatives in the region (284). As a result, complementarities were established between bilateral projects and regional

(278) E.g., Bossuyt, J., Local Authorities in EU external action after 2020: Strategic actors or distant voices?, 2020.
(281) EC, Guidelines for the programming of the NDICI-GE (2021-2027), 2020.
(283) The Somalia MIP 2021-2027 indicates, for its Priority Area 1 – Governance and Peacebuilding: ‘This priority area (...) is also aligned to PA 2 of the Africa Regional MIP: Democratic governance, peaceful and just societies’. It also indicates that ‘In close coordination with CSDP missions, the European Peace Facility (EPF), and the Peace and Security Regional Multiannual Indicative Programme, the capacity-building of security institutions, including maritime security, will be strengthened so as to accompany sustained support to the generation of security forces’; and that ‘The regional approach will be highly relevant also for marine conservation and maritime issues in frameworks such as NaturAfrica, the African biodiversity component of the EU Green Deal, and the GGW (Great Green Wall)’. Federal Republic of Somalia, Multi-annual Indicative Programme (2021-2027), 2022.
programming to improve, for example, cross-border collaboration between Local Authorities; alignment to the Khartoum process (285), counter violent terrorism (286); and to strengthen ocean governance and maritime security with the regional Red Sea Programme (managed by EUD in Somalia). As evidenced by the Annual Action Plan 2022 (287), the focus of the Horn of Africa (and partnership with Intergovernmental Authority on Development (IGAD)) as a region has been significantly reduced under NDICI-GE, but support to the region is now integrated into broader interventions in similar areas, and IGAD is set to benefit from the regional MIP’s support measures. 

- This lack of complementarity echoes a similar issue under the 11th EDF when, according to the 2017 MTE of EDF (288), the complementarity between the EFD, regional and intra-ACP envelopes remained weak.

**Instrument internal coherence and regional coherence under IPA III**

Document review and stakeholder consultations show:

- Analysis of the IPA III Programming Framework (289) reveals that it is coherent with the Regulation and with the Enlargement policy framework, underlying the strong attention paid to promote coherence and synergies.
- Targeted consultations with the Practitioners Network and interviews (with line DGs and national stakeholders including CSOs) show that regional synergy is not taken for granted.
- The 2022 EC study on progress in regional policy (290) links this to the fact that bilateral and regional programming follow two separate decision-making processes (the first being highly dependent on government-led processes, whereas the second is more EU-controlled) and identified the continuation of such shortcomings from IPA I to IPA II and IPA III.

**The DOAG reflects an emphasis on integration and more coherence**

Document review and stakeholder consultations show:

- The DOAG Regulation (291) is aligned with the global EU agenda by explicitly referencing key frameworks like the SDGs, the Paris Agreement on climate change, and the Addis Ababa Action Agenda. It places a strong emphasis on inclusivity, interconnected objectives, and notably focuses on gender equality and women’s empowerment.
- Interviews with EU staff at HQ and in EUDs confirm the high level of coherence with EU policy priorities, norms and interests.

**Termination of the PI**

Document review and stakeholder consultations show:

- The Coherence Report 2017 (292) assessed the PI very positively and so did interviewees. Also: ‘The PI was a success story’, according to one EU official at HQ.
- Review of the NDICI-GE Regulation shows that he legacy of the PI as an instrument that focussed on the EU as a global actor partnering with third countries on a peer-to-peer basis was maintained. For example, the idea of promoting mutual interests and more equal partnerships permeates the whole NDICI-GE (293).
- According to several interviewees at EU headquarters level, quite some adaptations in terms of coordination and work processes had to be made with the start of the current MFF, which was raising questions whether this new set-up would be most effective in pursuing the EU’s goal of becoming more political and more global.
- According to interviews across EU services, the potential for complementarity and enhanced coordination between FPN, the geographic and thematic envelopes, requires a degree of institutional learning to create a shared understanding that this is still a process under construction across EU departments.

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(290) EC, Study on progress in regional policy of the WB6 and Turkey, 2022.


• As confirmed by EUD written contributions and interviews, the start of the new set-up has not been without any hurdles, as initial experiences led to gaps in terms coherence and continuation, with PI projects discontinued sometimes without a traceable rationale or a shared institutional assessment, or FPN pilots or bridging initiatives not being followed up.

• As evidenced by interviews with EU staff across EU services, the transition to NDICI-GE has to a certain extent diluted the distinctiveness of the PI as the principal instrument devoted to EU interests and the mutual interest with partners. This has potentially had an impact on the extent to which these interests can be promoted, compared to what was feasible under the PI. Several factors for this risk of dilution were mentioned in particular, including the lack of priority setting; different time horizons (short-term and rapid for RR-FPN, versus long-term planning for country engagements); lack of experience to work in a more EU-interest driven fashion and from a more political perspective; pending decisions on follow up short-term actions; overlapping and unclear responsibilities across the EU departments on who leads on EU foreign policy priorities and needs. On the other hand, interviewees with EU staff at headquarters reported that opportunities were created for coherence and synergies under NDICI-GE that the PI had more difficulties to realise as a separate instrument in the past.

• Interviews with different EU services, including line-DGs, also showed several examples for promoting or hindering coherence of EU-interest driven actions:
  o DG INTPA (then DEVCO) worked on intellectual property rights through a programme called All-Invest. A parallel track existed under the PI with DG TRADE. Today, this has been brought together by DG INTPA under one umbrella in collaboration with DG TRADE and DG GROW.
  o DG Trade expressed concern that the integration under umbrella programmes AL-Invest Verde and Arise+ (ASEAN) of the existing long-standing and currently covered by the PI programmes on trade aspects of intellectual property, i.e., IP Key Latin America and IP Key South-East Asia, will not sufficiently allow DG TRADE to act on EU trade policy objectives in the area of intellectual property in an interest-driven fashion. While IP Key programmes focus on the EU trade agenda on IP in the respective regions, the INTPA programmes focus on technical assistance and are not necessarily trade-oriented. The differences in the governance of programmes also puts at risk the focus on trade policy and the EU interests. Finally, it seems that the overall financial resources devoted to intellectual property related programmes will be lower than under the current structure. DG TRADE maintains interest in continuing IP Key programmes as separate programmes with clear EU trade policy objectives.
  o Attention to critical raw materials was difficult to get some years back despite efforts made by DG GROW to put this issue on the agenda. The PI provided a useful and effective conduit for actions that was then lost under the NDICI-GE geographic programmes. Since COVID-19 and the Russian war of aggression against Ukraine, uncertainty around the relevance of a certain project in former DG DEVCO, then DG INTPA has disappeared. Today, hurdles in working with certain Latin American countries have been removed and cooperation across relevant line-DGs and DG INTPA, as well as DG NEAR has increased.
  o The case of deforestation: Following requests by EUDs, the EES and line-DGs, FPI initiated the preparation of an action in support of stakeholders in third countries who were complaining about new EU legislation on deforestation. But the process was confronted with a series of delays at headquarters level leading to a stand-still until the issue was brought to the attention of senior management. To solve the issue, three separate FPN actions were designed but the effects of these delays led to negative perceptions about the EU’s ability to respond in time.

Finding 22 Coherence of the new EFIs with other external instruments and EU actors is mostly positive, building substantially on changes introduced during the previous MFF to enhance coherence and synergies.

<table>
<thead>
<tr>
<th>Related indicator(s):</th>
<th>I-3.1.1, I-3.1.2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quality of evidence</td>
<td>✔</td>
</tr>
</tbody>
</table>

Need for mutual coherence, and coherence across EFIs

Document review and stakeholder consultations show:

• In the regulations, a high premium was put on the coherence between NDICI-GE and IPA III, focussing on the fundamentals of the accession process (234). The desk review shows that the IPA III Regulation is coherent with NDICI-GE policy-oriented approach.

(234) EU, Regulation (EU) 2021 / 1529 establishing IPA III, 2021. The fundamentals are broadly defined by the IPA III Regulation, Recital 6: Rule of law and fundamental rights; Economic governance; Democratic institutions and public administration reform. In addition (Recital 7), good neighbourly relations, although not explicitly a part of the fundamentals, are another core requirement to be supported in priority by the Instrument.
• The IPA III Windows, on paper (295), are also closely aligned with key EU policies, in particular Window 3 (Green Agenda and sustainable connectivity) is closely aligned with objectives of the European Green Deal, Global Gateway, Western Balkans Economic and Investment Plan, and the Green Agenda for the Western Balkan – whereas all region-specific policies are strongly aligned with EU-internal policies.
• The IPA III and NDICI-GE regulations (296) alike further emphasise the need for coherence between IPA III and the other EFIs. In practice, coherence across instruments is further supported by the common rules and procedures as per the NDICI-GE Regulation, also applicable to IPA III, both in case of direct and indirect management. The rules and procedures extend to implementation, visibility, and monitoring and evaluation of interventions. This constitutes an appreciated novelty, which responds to some lessons learned from the previous evaluations (297) (see also Box 11).

Box 11 NDICI-GE and IPA III: the flipsides of Geographisation

The External Evaluation of the Instrument for Pre-accession Assistance (IPA II) (2014 – mid 2017) had shown that the coherence between IPA II and other EFIs was ‘good but not secured’, due to a different perspective on the balance between thematic and geographic programming. It saw IPA II as being more geographic, while other instruments more often thematic. Under the current MFF, the movement is inversed: NDICI-GE envisages Geographisation, whereas IPA III, offering an original approach to Geographisation, foresees geographic strategic programming (the Programming Framework) followed by geographised operational programming and implementation (Strategic responses and interventions’ design). It is too early to ascertain whether this constitutes a convergence, but some interviewees expressed concern that stark differences in the approach to Geographisation between NDICI-GE and IPA III might have an adverse effect on EU external action-wide coherence.

• The thematic programming of IPA III is strongly aligned with the thematic programmes under NDICI-GE (as IPA III beneficiaries may benefit from NDICI-GE programmes, as well as from the NDICI-GE cushion), in particular regarding human rights, democracy and CSOs (298). Thanks to original modalities (e.g., Civil Society and Media regional facility), IPA II reflected the thematic approach to these issues as global concerns under the previous MFF already (EIDHR and global thematic programmes being matched by IPA II facilities) (299).
• IPA III continues the practice under the current MFF: global thematic programmes of NDICI-GE are matched by IPA III facilities and the thematic programming of IPA III through the Windows, mentioned above (300).

Coherence between NDICI-GE and other EU external instruments

Document review and stakeholder consultations show:

• There is clear evidence from various sources, documents as well as interviews as listed below, that the introduction of new collaborative frameworks as of 2018 (Integrated Approach to External Conflicts and Crises and the Civilian CSDP Compact, both in 2018, and the Humanitarian-Development-Peace Nexus as of 2019) has incentivised more coherence and synergies as of 2018 around peace and security, resilience and humanitarian assistance:
  o According to interviews with EU staff at headquarters and EUD level, the positive track record from the implementation of the former IcSP makes it likely that the good performance can be replicated under the current MFF.
  o EUSRs commented very positively in the EUD written contributions about the complementary support to civil society organisations via the IcSP.

(296) ‘The Union should seek the most efficient use of available resources in order to optimise the impact of its external action. That should be achieved through coherence, consistency and complementarity among the Union’s External financing instruments, in particular the Instrument for Pre-Accession Assistance established by a Regulation of the European Parliament and of the Council establishing the Instrument for Pre-accession Assistance (IPA III) (the ‘IPA III Regulation’), the Humanitarian Aid Instrument established by Council Regulation (EC) No 1257/ 96(20), (…)’. EU, Regulation (EU) 2021 / 947 establishing the NDICI-GE, 2021. Recital 32.
The EU Better Working Together Guidance (2021) stresses the importance to systematically include DG ECHO in consultations in joint programming processes.

The study on the Implementation of the HDP Nexus, based on multiple country examples from Burkina Faso, CAR, Chad, DRC, Nigeria, Sudan Uganda, Iraq and Myanmar, shows that the approach is valuable and of added value to EU external action in protracted crises contexts.

As several EU stakeholders noted, the collaboration between EUDs, DG INTPA, DG NEAR and FPI with civilian CSDP missions has gradually improved since the adoption of the CSDP Compact (2018). Though structural challenges, in particular the frequent rotation of CSDP staff delegated by EU Member States continues – as documented in independent research papers.

According to interviews with EU staff at headquarters, DG DEFIS, DG INTPA and FPI cooperated successfully on international space / digital projects, which have a relevance for security. They have shown their value of promoting EU space services and data systems (Galileo and Copernicus programmes), though it is not clear so far how they will be further supported under NDICI-GE.

As evidence by interviews with EU staff at HQ, the EU election observation missions (EOMs) are also a good example of how complementarity can play at EU level, between the European Parliament, providing delegations of MEPs as observers, the EEAS taking care of the methodology, FPI organising and deploying EOMs and preparing the recommendations and DG INTPA dealing at EUD level with domestic election support and support to domestic elections observation (see Box 12).

Box 12 EU Election observation missions – Actions undertaken by FPI in cooperation with EEAS and European Parliament

- Exploratory missions (which assess the feasibility of EOMs when a country makes it to the priority EOM list for the first time)
- EOMs with the deployment of long-term observers 2 months before elections, during elections (with additional short-term observers) and 2 months following elections
- In cases for which no full EOM can be sent due to a military coup or for security reasons, two or three election experts are placed in the country around election time
- Follow up missions to a country mid-way between the last observed elections, and the upcoming ones, to follow up on the last EOM's recommendations.

According to one EU interviewee dealing with the EU’s support for Counter-Terrorism, the EU’s support to this sector has rapidly increased from EUR 6.7 million in 2013 to EUR 560 million in 2023. This has put a considerable strain on limited human resources as the sector’s programming requires intense collaboration with other EU services supporting Counter-Terrorism (Office of the EU Counter-Terrorism Coordinator, DG INTPA, DG NEAR, FPI, EEAS, EU Member States).

Evidence concerning CBSD / CBDSD integration with other instruments: To further strengthen the integration of security and development interventions, the EU created a new component in 2017 (IcSP regulations; 2017 amendment) to support military actors in support of development and security for development (‘CBSD’) (203). Under NDICI-GE, this has been renamed Capacity Building of Military Actors in Support of Development and Security for Development (CBSD) (204) which was turned into a modality and can now be used under any of the three NDICI-GE pillars. This modality has so far been hardly used according to a review of EU External Action Reports for 2021 and 2022, and was confirmed during interviews with EU staff at HQ level.

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(202) EC, HDP Nexus: Challenges and Opportunities for its Implementation, 2022.
(206) Capacity building of military actors in third countries should be undertaken as part of the Union’s development cooperation policy when it mainly pursues objectives in the field of development and as part of the Union’s Common Foreign and Security Policy (CFSP) when it mainly pursues objectives in the field of peace and security, in compliance with Article 40 TEU: EU, Regulation (EU) 2021 / 947 establishing the NDICI-GE, p. 14, 2021.
(207) Under the current MFF, a ceiling of EUR 270 million for seven years was envisaged for the CBSDS modality, amounting to some EUR 38 million per year.
The same EU staff at HQ level pointed also at a rather limited attention to security sector reform in geo-programming, noting that geographic and thematic staff do not see a strong role for themselves to engage in this domain. Engagements with military actors was broadly seen as an issue to be funded via the off-budget EPF instrument.

Coherence and complementarity with the off-budget EPF: To shape coherence with other EU support in the domain of peace and security, the EPF Regulation stipulates that the Facility should be used as part of the Union’s integrated approach, making the best use of synergies with other actions and support measures of the Union and its Member States, particularly civilian CSDP missions and projects under the Regulation establishing NDICI-GE (309). According to interviews with EU staff at HQ level, EPF assistance measures are programmed and implemented designed by the EEAS under the guidance of the Council and implemented with the support of FPI (the design remains with the EEAS). Information about this EPF support is shared with concerned geo-desks but the support is not strongly coordinated with other EU services funding peace and security actions of the EU, such as peacebuilding, conflict prevention, counter-terrorism or civilian aspects of security sector reform. For example, there are no records about possible linkages of the EPF support with the use of the new CBDSD modality which has been hardly used so far, as mentioned above.

EU staff at HQ level which deal with fragile situations, protracted crises and conflict mentioned during interviews that good progress was made with the introduction of the Humanitarian-Development-Peace (HDP) nexus towards the end of the last MFF. This was also confirmed via an independent study on the HDP nexus (310). The same interviewees, however, expressed concern that the termination of the EUTFs and the B-envelope for ACP countries does not allow the EU any more to adequately react to the increasing number of natural and man-made crises, which have emerged in different regions of the world since the start of the current MFF. Moreover, the use of the Cushion for global and geo-political crises (COVID-19, Ukraine and Syrian refugees) did not leave any more money to adequately react to such crises. According to EUD written contributions, this happened for example in the year 2022, when the EU was unable to respond adequately to the Pakistan floods due to the lack of funding at the country level.

INSC’s coherence with IPA III, NDICI-GE and vice versa

Document review and stakeholder consultations show:

- The INSC’s MIP 2021-2027 (311) puts more emphasis on integrated approaches and instruments than it did in the previous period. Increased synergies are also sought via the promotion of more cooperation between actors (EEAS, DG FPI, DG ECHO, DG ENER, DG NEAR, DG RTD)
- The evaluation of INSC II (2014-2020) (312) finalised in December 2021 concludes that the instrument has been successfully implemented during the period under evaluation. The instrument objectives were relevant to the European Union (EU) and partners’ policies, priorities and needs. Importantly, the instrument was assessed to have provided ‘unique added value’ by leveraging political engagement and financial resources for nuclear safety. At the same time, the evaluation cites insufficient resources to support the management and implementation of the INSC in the Directorate General for International Partnerships (DG INTPA) and the European External Action service (EEAS), limiting quality, visibility, and cooperation with other European Commission actors. This lack of resources was already stressed in a mid-term review 2014-2017 (313), and partly explains the very lengthy ‘time to contract’ (up to ten years) of the INSC between initial requests for cooperation and project implementation, which impacts INSC partners’ perceptions of the instrument. It was recommended to (re)assess where best to situate the INSC within the European Commission to ensure adequate quality resources, as well as improved synergies across EU services and sectors of intervention, and to raise the INSC’s political and policy profile.

Finding 23 New EFIs have the potential to provide a solid foundation for the design and implementation of activities with other European actors, including Team Europe Initiatives.

<table>
<thead>
<tr>
<th>Related indicator(s):</th>
<th>I-3.1.3, I-3.1.4</th>
<th>Quality of evidence</th>
</tr>
</thead>
</table>


(310) EU, HDP Nexus: Challenges and Opportunities for its Implementation, 2022.


TEI take-off comes with opportunities and challenges

Document review and stakeholder consultations show:

- Stakeholder consultations (314) have highlighted the need for clarifying and simplifying the TEI process and improving coordination and communication to effectively implement the Team Europe approach. Several experiences and observations were mentioned across different instruments and geographic programmes:

Table 8  Team Europe Initiatives experiences (315)

<table>
<thead>
<tr>
<th>Usefulness of TEIs</th>
<th>Challenges in working with TEIs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facilitated a more coordinated and inclusive approach across EU actors</td>
<td>Big pledges were announced by EU Member States, but financial commitments are still uncertain</td>
</tr>
<tr>
<td>Experiences of all participating actors are shared, creating new opportunities</td>
<td>TEI is seen as more difficult to shape in countries where some EU Member States are dominant</td>
</tr>
<tr>
<td>Have strengthened EU visibility and external communication</td>
<td>Concerns that EUDs could be reduced to a role of time-consuming coordination, reporting and monitoring</td>
</tr>
<tr>
<td>Promoting EU collaboration at the regional level</td>
<td>Risk that this whole-of-EU approach comes at the expense of alignment with country priorities and partnerships</td>
</tr>
<tr>
<td>Mainly useful in partner countries with multiple EU Member States present</td>
<td>Perceived as complex and time-consuming; high coordination costs</td>
</tr>
</tbody>
</table>

- EUD written contributions support the use of TEIs for peace, security and support to governance, including for fragile states, but it is too early to judge whether these TEIs will be effective in further strengthening whole-of-EU approaches.
- According to the TEI tracker on Capacity4Dev (318), 49 TEIs (37 %) are dealing with governance, peace and security which suggests that strong efforts are made to shape more coherence and synergies between the Commission and EU Member States.
- The EU’s CoA Report (2023) (319), however, mentions that only 14 % of TEIs are supporting governance, peace and security. According to interviews, this difference in percentage is caused by different perspectives and interpretations of what is contributing to these sectors. The TEI on Green Growth for Somalia (320), for example, promotes clean energy initiatives and a climate-resilient economy while helping to make Somali society and the state more resilient and thereby contributing to stability and peace in the country.
- Interviews with EU staff at headquarters show that emergencies (COVID-19, migration, energy crisis, earthquake in Türkiye) and the ensuing necessities have spurred the whole-of-EU and Team Europe approach.
- There are examples of good practices of collaborative work between the EU and its Member States highlighted in the Moldova Country Strategic evaluation (321).
- Under IPA II already, the sector working groups, led by the respective beneficiaries and the EU, included EU Member States and like-minded donors, and the IPA Committee included EU Member

(314) Targeted consultation with Practitioners’ Network.
(315) This evidence is based on results from the OPC online survey, EUD (written) contributions, validation survey, and Targeted consultations with EU Member States, DFIs / IFIs, PFD and the Practitioners’ Network.
(316) In the validation survey, 37 out of 60 EUDs agree strongly or to some extent that the current EFIs, facilitated by TEIs, help mobilise and share the knowledge and expertise of EU Member States.
(317) Africa counts today 17 regional and continental TEIs, including one to support the African Continental Free Trade Agreement (AfCFTA). This is an important departure from the 11th EDF, where cooperation with EU Member States at regional level had been reported as weak. A similar development is reported from the Asia / Pacific region.
(321) In reaction to the difficult diplomatic, political and economic situation facing Moldova, the EU and its MS came to a common diagnosis of challenges and their root causes, agreeing on key common messages, a synergy of strategic objectives, and a distribution of labour in some fields. European Commission, Evaluation of the European Union’s cooperation with Republic of Moldova (2014-2020), 2021.
States. In addition, EUDs have consulted with EU Member States on policy dialogue. These practices are retained under IPA III (322).

- The consultations conducted with EU Member States revealed widespread backing for Team Europe, but many EU Member States representatives called for the approach to be strengthened by clarifying processes, streamlining procedures, and ensuring better communication.
- A recent study noted that TE approach is often perceived as ‘a brand’, ‘a label’, ‘a marketing strategy’, and ‘a communication strategy’ aimed at giving more visibility to the EU’s engagement in partner countries. For those who are familiar with the approach, it is something that the EUD’s should have been doing anyway, given their task to promote synergies and coherence between member states and increase the EU’s visibility in partner countries (323).
- Interviews with IFIs concur that the level of coordination from EC HQ and EUD has improved, especially through the Team Europe Approach. But financial institutions have also pointed out that the initiatives also create additional transaction costs which may also delay processes.

Finding 24 EFSD+ opens up possibilities for strengthening the whole-of-EU approach but it is too early to assess the extent to which this might happen.

<table>
<thead>
<tr>
<th>Related indicator(s):</th>
<th>I-3.1.4, I-3.1.5</th>
<th>Quality of evidence</th>
</tr>
</thead>
</table>

Internal and external linkages of EFSD and EFSD+

Document review and stakeholder consultations show:

- According to the Commission’s own website, 40 programmes in sub-Saharan Africa, Latin America and Asia Pacific will be implemented by European Financial Institutions, such as the EIB, the EBRD and national development banks. In total, 20 financial partners participate in the EFSD+ guarantee programme (324).
- Despite these achievements in opening up the financial architecture, major players, above all the EIB, but also the EBRD, AFD and KfW account for over 45% of guarantee budget under the open architecture window, and 48 out of 66 blending operations (325).
- Concerning the creation of synergies with other modalities, including budget support and policy dialogue, experiences from the EFSD demonstrate that this is done on a rather ad-hoc basis instead of systematically (see also Box 13).
- The Main outcomes of the mapping of external financial tools of the EU also shows the willingness to enhance coordination among DGs TRADE and DG INTPA and DG NEAR and find pragmatic ways of advancing a whole-of-EC approach, including through EFSD+ (326).

Box 13 Systemic challenges undermining EFSD(+)’s coordination with other EU instruments

- EFSD and the EFSD+ distinguish themselves by their market-oriented approach and execution through financial institutions, emphasizing private sector involvement in development. This stands in contrast to government-administered budget support and the often EUD-managed technical assistance. The former leverages financial instruments to align with both policy goals and market dynamics, whereas the latter are typically directed by partner country governments and EUDs, respectively.
- The integration of the EFSD+ into the programming exercise and its strengthened dialogue between EUDs, financial institutions and the Commission are expected to facilitate the harnessing of synergies between the different instruments. Capacity to deal with the new financing instruments has increased in EC headquarters, but interviews indicate that capacity at EUD level has been slow to develop.
- Not all financial institutions consider serving policy reforms as part of their investment operations, which also limits their (pro)active involvement in more closely combining their activities with EU budget support and policy dialogue / reforms.
- Findings on the collaboration between DFIs / IFIs and the EU display a fundamentally different way of working which can hamper effective collaboration. Differences mentioned concern the approach to monitoring, and the way how risks are dealt with.

(325) This converges with Landsgarde E., The Future of the EU blended finance and guarantees: An assessment of cooperation strategies with least developed countries in Africa, IDOS Discussion Paper 2, 2023, which found that the EIB, the AFD and KfW are being noted as the most consistently mentioned in connection with the EFSD+.
(326) EC, Main outcomes of the mapping of external financial tools of the EU– SWD(2023) 96 final, 2023.
Synergies between EFSD+, TEIs, and Global Gateway

Document review and stakeholder consultations show:

- The EC actively bridges Team Europe and the EFSD+ by offering strategic orientations and areas of priority investments encompassing TEIs for EFSD+ guarantees, thereby enriching the preparation of PIPs (327).
- The Western Balkans Investment Framework (WBIF) funds the Economic and Investment Plan for the Western Balkans’ 2021-2027 (328) and offers a bridge between IPA III and the EFSD+ thereby shaping synergies with EU’s support in NDICI-GE-funded countries (329), therefore constituting a good and functional example of a joint European effort with efficient stakeholder coordination as well as complementary use of financial (and non-financial) instruments.
- The EFSD+ is expected to play a major role in mobilising funding for Global Gateway initiatives. Coordination with other approaches and actors to achieve this goal will be needed, potentially including export credit agencies to mobilise more private sector engagement (330).

JC 3.2 Coherence and synergies with priorities of non-EU actors

The analysis under this JC has relied on a variety of sources of information. In addition to the documentary review, the analysis built on the mapping of EU spending actions as well as interviews, targeted consultations and surveys. The main sources used are summarised in the table below.

<table>
<thead>
<tr>
<th>Table 11</th>
<th>Main sources of evidence for JC 3.2</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main sources – documents</strong></td>
<td><strong>Main sources – surveys</strong></td>
</tr>
<tr>
<td>Overarching policies, e.g., New Consensus on Development</td>
<td>OPC survey</td>
</tr>
<tr>
<td>EFI-level reporting and previous EFI evaluations</td>
<td>EUD written contributions</td>
</tr>
<tr>
<td>Strategic evaluations (thematic, country, regional)</td>
<td>Strategic programming documents (MIPs, SRs) and AAPs</td>
</tr>
<tr>
<td>Strategic programming documents (MIPs, SRs) and AAPs</td>
<td>EAMRs at country and HQ level, AOSD Reports at country level</td>
</tr>
<tr>
<td>OPC survey</td>
<td>EUD written contributions</td>
</tr>
</tbody>
</table>

Finding 25 Collaboration with a mix of aligned non-EU partners shapes a coherent EU external action under the previous as well as current MFF.

*Related indicator(s): I-3.2.1, I-3.2.2, I-3.2.3*

Quality of evidence

Collaboration and partnerships with non-EU actors

Document review and stakeholder consultations show:

- According to the Evaluation of the EU-UN cooperation (2023), the UN remains a major partner of the EU for peace, stability and conflict prevention, and the EU-UN cooperation has intensified including to address ‘new topics’ and global threats such as climate-security and cybersecurity. But EU-UN

(328) Barlett, W., et al., The Economic and Investment Plan for the Western Balkans: assessing the possible economic, social and environmental impact of the proposed Flagship projects, study requested by the AFET Committee, European Parliament, 2022.
(329) While EFSD+ is established by the NDICI-GE Regulation, it covers both NDICI-GE and IPA countries. IPA III allocations are used to provision the guarantee agreements for the Western Balkan region.
coherence can still be improved, especially between UN missions and EU CSDP missions \(^{(331)}\). Examples of international initiatives through UN organisations and other aligned multilateral actors are the following:

- The FPI Annual Report (2021) mentions support provided to promote non-proliferation and disarmament via the Organisation for the Prohibition of Chemical Weapons, to complement UN-led peace processes in Yemen, Syria, Libya the Central African Republic and the OSCE Special Monitoring Mission in Ukraine and a support to the Climate Change and Security Partnership with the UN Environment Programme \(^{(332)}\).
- In terms of new programming, the AAP 2021, Action Document 5 on CPPB & Crisis Preparedness specifies the EU support to the UN Peacebuilding Fund which is seen as a way to increase the EU's leverage on international peacebuilding together with multilateral organisations \(^{(333)}\).
- The Joint Communication on Multilateralism (2021) also lists the EU's support to the UN Secretary-General's Action for Peacekeeping initiative by updating the EU-UN partnership on crisis management and peace operations and the UNSG's call for a global cease-fire by taking forward the new EU mediation concept in support of multilateral responses to emerging or ongoing crisis situations \(^{(334)}\).
- According to the Joint Progress Report on Climate Change, Defence and Security (2020-2022) \(^{(335)}\), the engagement of the EU and the UN related on climate change initiatives and on linking security and development are closely aligned and shape synergies.
- The IcSP was seen as relevant and capable of filling gaps, enhancing coherence and creating synergies in priority EU actions. The EU External Action Report (2020) and the FPI AOSD 2020 Report \(^{(336)}\) highlight positive feedback on the IcSp's role in filling gaps, enhancing coherence and creating synergies with priority EU actions. The crucial role the IcSP played in support of UN-led peace processes was also mentioned. Moreover, the IcSP was identified as the primary source of EU financial support for the OSCE Special Monitoring Mission in Ukraine \(^{(337)}\).

- Regional organisations may be at a disadvantage under the new Regulation as cooperation at the regional level can now be pursued more flexibly under multi-country programmes \(^{(338)}\).
- As highlighted in interviews with EU staff at HQ level, this new stipulation mentioned above has become problematic for some regional organisations that were until then heavily subsidised by the EU. In the case of sub-Saharan Africa, the relevance of regional organisations, which heavily relied on EU funding, has declined with the termination of EDF.
- It was also stated during interviews at HQ level as well as interviews with EUDs in sub-Saharan Africa, that the regional MIP was elaborated late and sometimes without any consultations with regional and continental organisations during programming.
- According to interviewees with EU staff and the EUD validation survey, the NDICI-GE Regulation lacks the spirit of a 'genuine partnership' with regional organisations, as compared to the previous MFF and the ethos of Cotonou and post-Cotonou agreements.
- As noted in targeted consultations and observed in certain thematic evaluations (e.g., 2023 GAP III MTE), international organisations (primarily of the UN family) and regional organisations, funded by the EU, contribute to the EU's programming on human rights and the rule of law. They provide grant schemes to CSOs and, sometimes, to Local Authorities. Although criticised by CSOs for potentially deflecting EU funding from country partners, this funding mechanism appears to be the best possible solution when implementing international and regional human rights legal frameworks in support of human rights and the rule of law \(^{(339)}\).


\(^{(333)}\) AAP 2021, Action Document 5 on CPPB & Crisis Preparedness.

\(^{(334)}\) EU, Joint Communication on strengthening the EU's contribution to rules-based multilateralism, JOIN(2021) 3 final, 2021.


\(^{(339)}\) As heard in targeted consultations, and observed in some thematic evaluations (e.g., EC, Mid-term Evaluation of the implementation of the EU Gender Action Plan III (2021-2025), 2023).
Beyond financial institutions, the EFSD+ also facilitates cooperation between European donors and implementing agencies and non-EU institutions. This is the case of blending operations where there have been some examples of TA co-financing with non-EU actors such as USAID.

Finding 26 Some improvements were made in shaping more coherence and synergies with non-EU actors, but intensity of coherence is overall similar to the previous MFF.

### Quality of evidence

<table>
<thead>
<tr>
<th>Related indicator(s): I-3.2.2, I-3.2.3</th>
</tr>
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<tbody>
<tr>
<td>Quality of evidence</td>
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</table>

### Cooperation and achieving synergies

Document review and stakeholder consultations show:

- The consultations conducted with EU Member States, CSOs, Local Authorities and UN agencies, as well as several thematic evaluations indicate that some of the limitations experienced in relation to the EU’s collaboration with accession countries during the previous MFF have been addressed. There appears to be a stronger dialogue and earlier consultations with DFIs / IFIs, regional and international organisations during programming compared to the past (346).
- Via IPA III, a higher premium than ever is put on shaping more coherence around aligned values with the Governments of accession countries through the Fundamentals (341).
- According to interviews with EU staff, close partnerships are promoted through international organisations and EU Member States’ agencies for implementation in the case of NDICI-GE, as is evident in the Neighbourhood. In sub-Saharan Africa, the EU increasingly collaborates with EU Member States’ agencies as implementing partners.
- According to the 2021 Evaluation of INSC (2014-2020), the INSC is fully aligned with the EU’s policy objectives and is well integrated among international bodies overseeing nuclear safety and safeguards (342).
- Concerning DOAG, in follow-up of the previous MFF, efforts to ensure coherence with EU policies and programmes are primarily promoted via the Association of the Overseas Countries and Territories of the European Union (OCTA) (343).
- International and regional organisations are important channels for the implementation of EU funding. Most importantly, these organisations serve as both the source and monitors of all legally binding standards, which the EU uses as a basis for its programming, and for many conditionalities. They also play a pivotal role as a primary source of data for the EU, with substantial big data used in MIPs originating from entities such as the Universal Periodic Review, UNICEF, CEDAW and others. This is true worldwide, and even more so in the Neighbourhood and Enlargement regions, where all applicable conventions come from the Council of Europe (e.g., the European Convention on Human Rights, Framework Convention for the Protection of National Minorities and the Istanbul Convention) together with the data which comes from CoE monitoring bodies (Group of Experts on Action against Trafficking in Human Beings, Group of Experts on Violence Against Women and Domestic Violence, Group of States Against Corruption, and the European Court of Human Rights).
- The trend of delegating the implementation of significant portions of cooperation to international organisations, which began in the previous period, has continued under NDICI-GE as evidenced by the implementation arrangements detailed in the MIPs, where indirect management is the one of the most used aid modalities. This approach has enabled the EU to leverage the specific expertise, experience, and networks of other donors in certain countries and sectors, also contributing to better coordination with other donors.
- According to consultations (344), efforts are made during the programming under the current MFF, to strengthen dialogue and have early-on consultations with regional and international organisations and DFIs / IFIs, including the Council of Europe, OSCE, OECD, UN, World Bank and the EBRD. But there is no evidence which would suggest that this has resulted in enhanced coherence compared to what has been undertaken and achieved during the previous MFF.
- Findings from the Global Challenges programme, for example, state the EU support promotes coherence by supporting global public good problems and global-level actors and coalitions (mainly

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(341) IPA III Regulation, Recitals 6, 12, Art. 3.1.


(344) Interviews with EUDs and NIPACs, Targeted consultations with EU Member States.
UN-led. But, according to the 2017 MTE of DCI, the transition from the GPGC, (supposedly empowering global coalitions to address global challenges) to Global Challenges has not resulted in any enhanced coherence, nor in the ability of global actors to address fundamental global governance and public good problems better than before (345).

- Findings from sub-Saharan Africa provide a similar picture. Coordination challenges among international partners persist at country-level, as exemplified by the case of Chad (see Box 14).

**Box 14**

**Coordination challenges on the HDP nexus in Chad**

In Chad, the programme to strengthen the resilience of food systems (P2RSA, EUR 44 million), adopted in 2021, was established to fight against the food crisis and enhance the resilience of populations while laying the foundations for strengthening agricultural sectors. The action contributes to the operationalisation of the EU Council's Humanitarian-Development-Peace nexus initiative, with Chad being one of the pilot countries. Pioneering a nexus approach with various partners, a Task Force was established in 2020, including EU Member States, Switzerland, the United Kingdom, the United States, and the World Bank. However, it faced challenges in terms of leadership and implementation. Although an action plan was drafted in 2021, it had not been endorsed by the end of 2022 (346).

- The FPI Annual Report (2021) states that building on years of earlier collaboration, international efforts in support of conflict prevention, peace building and post-conflict settings, as well as on global and transregional threats to security and peace continued with the UN, and other international organisations as well as international and local civil society actors (347).

**Finding 27** The new EFIs open doors for a more thorough policy dialogue, public diplomacy, strategic outreach and EU visibility, though not all opportunities have been fully used so far.

<table>
<thead>
<tr>
<th>Related indicator(s): I-3.2.2, I-3.1.3</th>
<th>Quality of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Combining funded actions with non-spending activities</strong></td>
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</table>

Document review and stakeholder consultations show:

- A review of the MIPs 2021–2027 for the Neighbourhood shows that MIPs underline the need for long-term communication and partnership initiatives going beyond the promotion of cooperation activities and results, to build trust with partner countries and foster understanding of EU policies across the public by engaging with target audiences and partners, such as youth, academics, influencers (e.g., media, think tanks, and business community), civil society and cultural actors.

- Evidence from NDICI-GE’s geographic support to Asia, the Pacific and Latin America confirm this finding. In country and regional portfolios, as highlighted in strategy and programming documents, EU support is presented as an integral approach based on policy dialogue and diplomacy, technical assistance and investments.

- Similar evidence emerges from the 2023 review of the NDICI-GE thematic programme in support of Human Rights (349) where it is noted that the EU’s policy leverage extends beyond the impact of its programmes, to public diplomacy and strategic communication at all levels, reinforced thanks to the MIPs.

- Some interviewees highlighted that the EC should clarify the implications that the wider use of EFSD+ tools within geographic programmes carries for other types of assistance. This is essential not only to understand the trade-offs that exist in strengthening a commitment to the EFSD+ in relation to other support modalities, but also to ensure that interventions achieve synergies in implementation.

**Visibility**

Document review and stakeholder consultations show:

- According to the EUD written contributions and interviews with EU staff at HQ level and in EUDs, the dismantling of NAOs and RAOs resulted in open discontent from the ACP’s member states and RECs. In a number of cases, this has made the EU’s engagement with national authorities more difficult and impacted on how the EU was viewed by country partners, from government in particular. Similarly, the curtailment of the partnerships with RECs, described by EU staff during interviews as a ‘revolution’, was not well managed and poorly communicated.

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(347) EC, *Authorising Officer by Sub-delegation report 2021, 2022.*

Recent strategic country evaluations in Georgia (349) and Azerbaijan (350) point to issues of credit for achieved results often attributed to international organisations, such as the UN, rather than the EU itself.

Another strategic country evaluation on Somalia reports that the EU’s visibility has not fully reflected the prominent role the EU plays in the country (351).

Similar evidence is reported from Honduras where the attribution of economic achievements to the EU remains challenging, despite being one of the largest donors (352).

As for the EU’s cooperation with the IAEA and actions supported via the EBRD, the evaluation of INSC II (2014-2020) highlighted limitations, such as delays in implementation as well as loss of control and visibility (353).

With regard to EFSD and EFSD+, financialisation has led to a loss of control and visibility for the EU, primarily due to the multitude of intermediaries involved. All of the financial instruments are implemented by mainly DFIs / IFIs, which in some cases are intermediated by financial intermediaries, such as actors from the private sector. Immediate / short-term visibility is further hampered by the limited number of investment operations and the long time required for investment operations to be translated into results (354).

According to NGOs, continued EU support for conflict prevention and peacebuilding (CPPB) is important in a context of declining support and resources for such efforts. But the EU is not visible enough in its political messaging in support of CPPB, including towards EU Member States (355).

**Strategic outreach**

As the Evaluation of the EU-UN cooperation (2023) highlights, there is a need to make better use of the EU’s financial and political leverage in the context of multilateral debates, negotiations and country-based action with the UN. At the global level, the EU and the UN increasingly strengthened the strategic nature of their partnership; at the country / regional level, however, cooperation between the EU and the UN often remained rather grounded in a pragmatic approach instead of following a systematic effort to build a longer-term EU-UN partnership in the country / region. The EU generally selected UN entities as implementing partners on a project-by-project basis, given their context-specific added value or the lack of viable alternatives. Overall, there was a lack of direct strategic dialogue and limited information exchange at the country level between the two institutions (356).

Public diplomacy targeting not just policy-makers and the media, but also civil society, think-tanks, academia, opinion-formers, legislators, the business community, cultural stakeholders and the general public was a key aspect of PI. According to the review of MIPs for the periods 2014-2017 and 2018-2020, the objective of public diplomacy was also ‘to increase mutual understanding, improve the perception of the EU and of its policies and, ultimately, to build trust and facilitate future cooperation’ (357).

Some EU staff at HQ level expressed concern during interviews that the integration of the PI’s objectives across the NDICI-GE’s geographic and thematic programmes would not sufficiently allow it to act on different EU policy priorities in a political and interest-driven fashion. Reference was made to the focus on Global Gateway and the Green Deal, while other areas of strategic interest of the EU would risk being neglected, as well as the limited staff and financial resources available for public diplomacy under the FPN, which oversees those activities for some MICs and HICs.

**JC 3.3 EFIs’ contributions to an EU added value**

The analysis under this JC has relied on a variety of sources of information. In addition to the documentary review, the analysis built on the mapping of EU spending actions as well as interviews, targeted consultations and surveys. The main sources used are summarised in the table below.

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349 EC, Evaluation of the EU’s cooperation with Georgia, 2022.
350 ‘Visibility is reduced whenever implementation is entrusted to another entity with its own brand recognition, as it is the case with organisations such as UNDP and UNICEF. A significant part of the actions implemented over the period under consideration had an inherently limited potential to achieve a high level of visibility vis-à-vis the general public.’ EC, Evaluation of EU Cooperation in Azerbaijan, 2018. Page 82.
352 Interview with an EU Member State official active in the country.
354 Interviews EU staff at HQ level.
355 Focal group discussion with Brussels-based representatives of international NGOs.
Table 12 Main sources of evidence for JC 3.3

<table>
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<tr>
<th>Main sources – documents</th>
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<tr>
<td>• EFI-level reporting and previous EFI evaluations;</td>
<td>• EUD written contributions</td>
<td>• Interviews: EU HQ, EUDs, IOs and international CSOs, in-country stakeholders (authorities, CSOs), European Development Financial Institutions / IFIs and EU Member States (HQ, local representatives)</td>
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<td>• Strategic evaluations (thematic, country, regional)</td>
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<td>• EU sector guidelines and thematic guidance notes and templates</td>
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<td>• Strategic programming docs (MIPs, SRs) and AAPs</td>
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<td>• EAMRs at country and HQ level, AOSD Reports at country level</td>
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<td>• Other (e.g., think tank reports)</td>
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Finding 28 The new EFIs have laid the foundations for the EU to strengthen the EU’s added value on external action, yet their potential to do so depends on multiple factors and varies between instruments.

**Related indicator(s): I-3.3.1, I-3.3.2, I-3.3.3**

**Quality of evidence**

**Track-record of EU added value**

Document review and stakeholder consultations show:

- According to the 2017 MTE of the EFIs, a combination of several, and rather different types of factors explained the added value of the EU's instruments. These were mentioned as follows: i) the EU's competence or expertise; ii) the EU's nature as a supranational entity, and the relative neutrality, political influence and leverage this potentially entails; iii) geographical spread of some instruments, including the presence in fragile contexts where there are fewer development partners and the significant volume of funds available; iv) the scope of the instruments and modalities (such as budget support, grants, indirect management, blending facilities and rapid decision-making for crisis response); and v) the ability of the EU to lead on joint actions (i.e., joint programming and joint implementation), especially with EU Member States. Additional factors mentioned where that the instruments can be used to intervene at various levels (i.e., national, regional, continental), the predictability of funds, the emphasis placed on regional cooperation, and the unique position of the EU to prepare accession countries for EU membership through IPA. Finally, the availability of specialised instruments, such as lCS which was able to act in zones where other actors are absent and the EIDHR actions in support of sensitive human rights situations without needing partner governments' consent (358).

- INSC, being a specialised instrument in support of nuclear safety, has contributed to EU added value. Both the 2017 MTE and the 2021 Evaluation of INSC II (2014-2020) concluded that the Instrument goes beyond the capacities of EU Member States and other donors, providing unique added value in nuclear safety cooperation with third countries (359).

- The INSC supported complementarities, coordination and synergies, offering specialised know-how and expertise, promoting high nuclear safety standards and leveraging political engagement and financial resources for nuclear safety. These findings on the INSC’s added value align with the EC’s 2018 Impact Assessment of the establishment of NDICI-GE and INSC, emphasising that the INSC’s institutional framework enables the EC to play a leading global role in nuclear safety, allows

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engagement in policy dialogue with partner countries and, in specific cases, triggers political dialogue in the wake of nuclear safety negotiations (360).

• According to the 2023 Evaluation of the EU support to Somalia, a combination of External Action instruments and modalities helped to support the promotion of EU values, democracy and rules-based approaches and to leverage policy dialogue (361).

• A distinct source of EU value added is its ability to mobilise a large range of instruments, modalities, and delivery channels. In addition, the value added of EU cooperation is strong from the Georgian point of view because of the unique position the EU occupies via the Association process and the DCFTA, its unique ability in use of the budget support modality to provide sector policy-level support with a minimum of transaction costs and relatively high predictability, and MFA to provide emergency support at the broadest fiscal and balance-of-payments level while building in conditionality (362).

• The EU’s geopolitical, cultural and economic influence and its range of instruments provide considerable added value to its cooperation with Armenia. The incentive of closer ties with the EU – in trade, in freedom of movement and in education, for example – stimulated and encouraged reforms in Armenia. The ability of the EU to offer meaningful and informed technical dialogue in areas such as vocational education and public administration reform add a level of detail and technical knowledge which helps to design the mechanisms and the process by which reform can take place. Finally, the financial instruments – in particular budget support – provide the means by which reforms can be put into practice. As the largest single donor, the EU is uniquely placed to marshal the efforts of other donors and international financial institutions and ensure coherence and coordination in their support for the country. The Armenian public is increasingly aware of the EU’s support and increasingly positive in its view of the EU (363).

• Similar messages can be extracted from interviews with EU staff and targeted consultations with the Practitioners’ Network as well as non-EU stakeholders in other regions, notably the Neighbourhood, Asia, Pacific and Latin America.

• However, the 2023 Evaluation of the EU’s cooperation with Papua New Guinea is more critical and notes that while NDICI-GE places emphasis on promoting EU interests, norms, values, and objectives, this approach can create tensions with the principle of ownership and alignment with national development priorities (364).

• Interviews with financial institutions confirm that by concentrating EU funding towards investment projects focussing on areas critical for the sustainable socio-economic development of the partner countries, the EFSD and the EFSD+ operations, have given the EU and European IFIs substantial additional firepower. For instance, the EFSD+ is playing a critical role in directing financial resources towards new EU policy priorities such as the response to the Ukraine crisis.

Creation of pre-conditions for added value

Document review and stakeholder consultations show:

• Broadening of available tools: Evidence from interviews with EU HQ and EUDs concerning the Neighbourhood show that the transition to NDICI-GE reinforced the EU’s potential for political and policy-related engagements by leveraging resources from other European actors under Team Europe and the EFSD / EFSD+. The most prominent example is the EU COVID-19 recovery response implemented across the Neighbourhood, which mobilised resources from EU Member States, NDICI-GE and DFIs / IFIs (365). This has allowed the EU to better draw on the expertise and capacity of its Member States and financial institutions, achieving a critical mass in partner countries, which helps the EU have a greater say in their policy choices and more opportunities to promote EU interests, approaches, and values.

• Document study and interviews show that, the EU has made important contributions to the European Financial Architecture for Development (EFAD) through EFSD and EFSD+, fostering a more unified and inclusive approach. The institutional set-up of EFSD+, with its open access investment windows also fulfils the European actors’ ambition of an open, collaborative and inclusive European financial architecture (366).

• Document review shows that guarantees and investment grants under EFSD and EFSD+, blended to loans provided by DFIs / IFIs for large infrastructure projects, have given the EU and European

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(362) EC, Evaluation of the EU’s cooperation with Georgia, 2022.

(363) EC, Evaluation of the EU cooperation with Armenia, 2020.


(366) Interviews with EU staff at HQ level; and Pérez, A., et al., The implementation of EFSD+ operations from an inclusive perspective, commissioned by the European Parliament (DEVE Committee), 2023.
Development Financial Institutions / IFIs a strong financial power, also to accompany socio-economic development and the green transition of many EU partner countries in line with the policy objectives outlined in the European Green Deal (367).

- As emphasised in Article 13 of the NDICI-GE Programming Principles for Geographic Programmes, EU values hold a central role in the new Regulation (368). This translates into a focus on human rights, fundamental freedoms, democracy, the rule of law, good governance, fight against corruption, open civic space and gender equality, support to common goals and multilateral alliances and cooperation, and a rules-based international system. In contrast, DCI and the 11th EDF did not explicitly elaborate on the promotion of EU interests and referred less clearly to the promotion of EU values, which were – using identical formulations – specified as human rights, democracy and the rule of law as well as the principles of ownership and mutual accountability (369).

- The NDICI-GE Regulation also empowers the EU to increase its support for civil society and human rights promotion in cases of severe or persistent deterioration of democracy, human rights, or the rule of law (370). Statistics show that NDICI-GE thematic programmes on human rights and democracy, and on CSOs – like the EIDHR and the DCI predecessor programmes – channel more funding than any equivalent programmes funded by European bilateral actors worldwide. Likewise, the IPA III Civil Society and Media Facility (and its predecessor) are better endowed than any other regional programme for CSOs. And in the NEAR region, the EU has the lion’s share of human rights, democracy, civil society and Local Authorities support in every partner country (371).

- In the validation survey sent to EUDs as part of this evaluation, 41 responses out of 60 strongly or somewhat agreed that the new EFIs help to foster the values agenda. Similar perspectives, where EU values were identified as an area of added value of the EU, were found in the OPC Consultations (especially from public authorities and less so from citizens with 79 % and 50 % positive answers respectively) and in the in-country survey. Concerning the EU’s support for Asia, the Pacific and Latin America, the EUD (written) contributions indicated differences between partnerships with like-minded countries (e.g., New Zealand, South Korea) which were welcome to promote EU values, and countries like China were promoting EU values was deemed ‘very challenging.’

- In the IPA region, the EU’s distinct added value is evident through the IPA III Programming Framework and indicative allocations, showcasing its significant volume of funding, broad geographic coverage and comprehensive thematic coverage (372). Interviews with NIPACs, national and international CSOs, along with EU staff, underscore the EU’s unique ability to implement a balanced portfolio at all governance levels and on a multi-country scale with substantial funding (comparatively more than in any other regions of the world) (373).

- According to the 2017 MTE of EFIs (374), this combination of comparative advantages, alignment with the acquis – a keystone for the accession process – was evident under IPA II. According to the independent evaluation on the EU’s support to CPPB, the former IcSP was able to counter crises and promote peace at different levels, ranging from activities against transregional and global threats to peacebuilding activities at the community level (ex-IcSP Art. 4 and 5) and to rapid response actions at the country level (375). Similar findings on the EU’s added value in this regard were stated in the Mid-Term Review of the EFIs (2017) (376).

- EU spending on counter-terrorism has increased rapidly and massively (377). This EU support contributes to the EU added value on peace and security, which – according to interviewees from (367) Poldermans, R., and Pereira, J., Implementation Report of the EFSD and the EFSD Guarantee Fund, a Report commissioned by the European Commission, 2020.


(371) OECD DAC Dashboard, Development Co-operation Profiles: European Union Institutions, https://www.oecd-ilibrary.org/sites/c0ad1f0d-en/index.html?itemId=/content/component/c0ad1f0d-en; EC Enlargement Package (including country reports); and national statistical institutes (sampled countries IPA).


(373) Interviews with NIPACs, national and international CSOs, EUDs. See also OECD DAC Dashboard, Development Co-operation Profiles: European Union Institutions, https://www.oecd-ilibrary.org/sites/c0ad1f0d-en/index.html?itemId=/content/component/c0ad1f0d-en.


(377) From EUR 6.7 million in 2013 to EUR 650 million in 2023, see Finding 22.
interviews at HQ and EUD level, as well as the EUD’s written contributions, mainly lies in its mix of instruments and modalities, which enables the EU to respond at different levels (local, national, regional and global). This mix includes the former CBSD and budget support. The latter was particularly important in the case of Somalia to create strategic leverage, in collaboration with other prominent international actors.

- According to a targeted consultation with international NGOs, the follow up to ICSP under NDICI-GE is seen as an important way to promote EU values and the EU’s role as a global peace actor. However, according to the consultation, these efforts are threatened by the EU’s overall securitisation trend and the lack of strategic coordination between FPI and military support provided by the EPF.

**Scale and scope for further EU added value**

Document review and stakeholder consultations show:

- Despite the EU’s efforts to generate more added value in the accession countries, the European Court of Auditors’ report (2023), and other internal documents as well as independent publications by CSOs or academia, have observed the blockade of certain fundamental reforms, such as constitutional reforms in Bosnia and Herzegovina and justice reform in various beneficiary countries, and even sometimes regression (e.g., withdrawal from the Istanbul Convention in Türkiye, the independence of the judiciary, or impunity for certain crimes in some beneficiaries).

- Similar to the GPGC, for which the value added by provision of EU specialised expertise has been explicitly recognised (2023), the Global Challenges — according to interviews with EU staff at HQ level, represents a platform for provisioning financial support as well as a mechanism for the projection of EU Member States’ expertise and policy experience covering a wide range of economic, social and environmental problems.

- Evidence gathered from the OPC and targeted consultations for this evaluation, line-DG interviews, the validation survey and EUD written contributions about the extent to which the EU was able to provide significant finance with a relatively long-time horizon for global challenges, and as such being an important source of EU value added, is mixed.

- The same sources (OPC and targeted consultations with Practitioners’ Network for this evaluation, line-DG interviews, the validation survey and EUD written contributions) do not provide any evidence whether Global Challenges can address deeper constraints around public goods, for example, any better than did GPGC despite the EU’s financial weight and its voice in setting priorities and strengthening implementation strategies in multilateral development institutions, civil society advocacy fora or private sector roundtables.

- The EU’s support to human rights, democracy and CSOs plays a pivotal role worldwide in promoting related values, thereby shaping an EU added value to what other international actors support in this domain. But according to several EU interviewees and participants to targeted consultations (with CSOs and Local Authorities, the UN and EU Member States) there is a concern that human rights, democracy, and civil society could decline in the EU’s agenda, as they are overshadowed by new emerging needs and priorities (e.g., migration, COVID-19 resilience, Russia’s war of aggression against Ukraine).

- The EU GAP III evaluation (2023) already identified this risk of reduced attention to human rights, democracy and CSOs. In addition, some international human rights CSOs report serious human rights concerns, sometimes in regions and thematic areas supported by the EU (e.g., migration in North Africa), which casts shadows on the EU added value in supporting human rights and democracy consistently.

- Also, as a growing number of countries graduate to become Upper-Middle Income Countries (UMICs) or High-Income Countries (HICs), the EU is designing different, mutual interest-driven cooperation strategies with these partners, not often focussed on human rights. Related findings originate from the deployment of EFIs in sub-Saharan Africa. Interviews with stakeholders from partner countries and the in-country stakeholder survey show that the EU has maintained a good reputation amongst

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(280) European Court of Auditors, *Special report EU support for the rule of law in the Western Balkans: despite efforts, fundamental problems persist*, 2022.


partners, in particular civil society, for being a human rights advocate. But some country partners, i.e., government authorities, as well as some CSOs, shared their discontent during interviews on the EU pushing for its own values, most notably around gender identity.

- According to desk review (386), expectations regarding the extent to which a wide range of partner countries can benefit from the EFSD and EFSD+ must also be considered realistically. The EU in Africa has made some, though rather unequal progress under the EFSD. The long lead times, concentration of resources and complexity of blended finance instruments, have raised concerns that expectations, often formulated as part of the Global Gateway discourse, will require significantly more efforts, convening power and expertise to materialise. At the same time, interviews with EUDs and partners are fully cognisant of the huge potential that EFSD+ (blending and guarantee) could potentially generate, in light of previous successes under EFSD.

- Available statistics from selected African countries (387) show that a handful of countries attracted more than 50% of EFSD resources available under the African Investment Programme (AIP) window over the period 2017-2020:

  - First came continental projects in sub-Saharan Africa (equivalent to 21% of total project costs); the countries that benefited the most were Madagascar (11%), Kenya (9%), Mali (5%) and Uganda (5%). Statistics from Mali as well as other highly fragile countries in sub-Saharan Africa as well as evidence from targeted interviews with non-EU experts on EFSD show, that DFIs/IFIs find the provisioning of loans only attractive in relatively bankable settings, making Financialisation inappropriate in precarious, conflict and prolonged crisis-affected settings where subsidised capital – in effect, capital grants – is most needed.

  - The performance-based approach and modulation of IPA III, which envisages ‘more for more’ with the performance-based approach (388) but also ‘less for less’ based on the modulation option (389) relies on the predictability of application of the corresponding provisions. The risk with unpredictable application of conditionalities is to accelerate negative trends, which could potentially reduce the credibility of the instrument’s modulation (390).

  - According to document reviews and interviews at EU HQ level, the former PI aimed to be more than a pure development cooperation instrument. The 2017 Coherence Report (391), the PI’s MIP 2014-2017 and the PI’s MIP 2016-2020 stated that the Instruments aim was to i) better enable the EU to pursue cooperation based on EU interests and to help building relationships with third countries, in particular high-income countries and EU’s Strategic Partners; and ii) that it was meant to enhance the articulation of the external dimension of EU domestic policies and support EU objectives on global challenges. Interviewees commented that, although the PI had some overlap with other EFIs, it was often the only available instrument to pursue bilateral cooperation objectives beyond development cooperation and with high-income countries (HICs) and UMICs that had graduated out of EU ODA.

  - The 2017 MTE of DCI confirmed the relevance and added value of the GPGC in supporting the role of the EU as a global actor. The main sources of EU value added were ‘[…] its political and economic clout, the wide geographic range of its cooperation (with EUDs present across the globe), and its participation in multilateral fora and processes that allow it to address global challenges and inspire global-level action to tackle them.’ As highlighted by the European Parliament’s 2018 in-depth analysis on the ‘Understanding EU external financing’, all this puts the EU in a position to offer expertise, economies of scale and predictable and long-term financing for the duration of its MFFs (392).

**Finding 29** The relevance of generating added value via dealing with situations of conflict and protracted crises might have been underestimated.

**Related indicator(s):** I-3.3.2, I-3.3.4

**Quality of evidence**

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**Focus on stabilisation and needs for crisis response**

Document review and stakeholder consultations show:

- Based on EU Statistical Dashboard extractions of sheet 23 in March 2023.
- Pérez, A., et al., The implementation of EFSD+ operations from an inclusive perspective, commissioned by the European Parliament (DEVE Committee), 2023.
- IPA III Regulation, Art. 8.5.
- Interviews with EUDs, NIPACs, CSOs.
Independent research (393) as well as interviews with EU staff at HQ and field level dealing with peace, stability and conflict prevention recognise that an increasing number of crisis situations need a diverse response capacity, comprising funding for engagements like conflict prevention, mediation or peacebuilding, as well as support to counter-terrorism actions and support to military actors.

But international NGOs and local CSOs stressed during targeted consultations and interviews that this changing security situation shapes an even stronger need to ensure that EU support in the security domain does not unwittingly contribute to abuses. Experience shows that the nature of the support provided to peace, stability and conflict prevention, in particular where support is provided to civilian security institutions and its actors, or where capacity of military actors in support of development and security for development is funded, can lead to such misuse and might possibly impacting negatively on the EU’s reputation as a credible peace actor (394).

**Underestimation of what it takes to engage on crisis response**

Document review and stakeholder consultations show:

- Interviews with EU staff across services dealing with fragility, protracted crises and conflict stated that the EU – despite its solid track record on supporting peace and security – risks losing part of its added value if it does not maintain its strong engagement for crisis response and peacebuilding, including in fragile countries and protracted crises.
- According to targeted consultations with the Practitioners’ Network, the past IcSP and the current Crises Response window under the NDICI-GE’s RRP mainly draws its added value from its quick, flexible support and its long-term commitment to conflict prevention, peacebuilding and crisis response in situations of conflict and protracted crisis (especially in Africa).
- Concerns were expressed during targeted consultations with EU Member States and the Practitioners’ Network that the Cushion and the resilience line, which were envisaged to provide flexible responses and funding to enable linkages between short term and long-term interventions, could not be used any more – because funds were spent on unexpected crises (COVID-19, Russia’s war of aggression against Ukraine) and the support for Syrian refugees in Türkiye.
- According to the European Parliament (EPRS) the NDICI-GE’s budget for Peace, Stability and Conflict Prevention (PSCP / Pillar 2) and the Crises Response (Pillar 3) slightly decreased compared to the previous MFF (minus 1.2 %) whereby funding for PSCP increased by 24 % and funding for Crisis Response decreased by 7.5 %. The different percentages are explained by the different amounts allocated to PSCP and Crisis Response, respectively: EUR 908 million are allocated to the thematic PSCP programme and EUR 3,183 million to the Rapid Response Pillar(395).

**EQ4 – EU’s leverage (as development partner, global player and geopolitical actor) to achieve expected results**

**JC 4.1. EFIs have enabled EU’s role as a major development cooperation partner**

The analysis under this JC has relied on a variety of sources of information. In addition to the documentary review, the analysis built on the mapping of EU spending actions as well as interviews, targeted consultations and surveys. The main sources used are summarised in the table below.

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<td>EUD written contributions</td>
<td>Interviews: EU HQ, EUDs, IOs and international CSOs, in-country stakeholders (authorities, CSOs), European Development Financial Institutions / IFIs and EU Member States</td>
<td>Mapping of EU spending actions</td>
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(393) EC, HDP Nexus: Challenges and Opportunities for its Implementation, 2022.
Finding 30 The new EFIs and principles underpinning their deployment have better equipped the EU to exert leverage as a development partner. However, even more than in the past, whether the EFIs achieve intended objectives by enhancing levels of EU influence, depends on global dynamics and contextual realities in partner countries and regions.

Related indicator(s): I-4.1.1, I-4.1.2, I-4.1.3, I-4.1.4

Contextual factors and dynamics that determine EU’s potential for leverage

Document review shows:

- The 2021 Evaluation of budget support in Morocco (396) notes that budget support successfully supported public financial management (PFM) reforms (Hakama) and contributed to increased access to and quality of health care, particularly for mothers and children (Programme d’Appui au Secteur de la Santé).
- According to the latest EAMR, in Egypt, one of the major successes has been the reform of the Technical Education, in particular in the field of competence-based education (CBE). The EU-funded TVET has enabled the Ministry of Education and Technical Education to transfer 70% of the old curricula into CBE in addition to introducing new programmes. For the first time the private sector has been directly involved in the formal assessment of technical education students in their final year.
- According to the most recent EAMR, in Jordan, EU support successfully contributed to the adoption of a solid waste management bylaw in 2022.
- According to the recent country strategic evaluation in Moldova (397), while less successful in achieving reform targets due to the difficult context in the country, the budget support and the complementary technical assistance have managed to strongly incentivise policy-level commitments in the sector of PFM, VET and police reform. In the energy sector, EU support contributed to updating the National Energy Crisis Action Plan by the government and to the preparation of a draft law on the new Residential Energy Efficiency Fund.
- The country strategic evaluation of Georgia highlights several areas where EU support has been important, notably in the implementation of public financial management (PFM) reforms. Following initial legislative and regulatory progress, EU policy dialogue has been instrumental in accelerating and maintaining the momentum of reforms (398).
- According to the latest EAMR (399), in Ukraine, despite the challenges caused by the war, EU technical assistance supported reform progress in various policy areas, such as rule of law (judiciary and anti-corruption), energy market integration, public administration reform and PFM.
- The 2017 MTE of EDF (400) highlights specific success stories related to budget support: ‘one specific advantage of EDF is the use of Budget Support, it has combined a large financial envelope with a framework of policy conditions. This has created the incentives and structure for policy dialogue to take place. Positive examples include BS in Senegal, Namibia, and the WatSan sector in Sao Tomé & Principe.’

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(398) EC, Evaluation of the EU’s cooperation with Georgia, 2022.
As noted by the 2022 Fast Track Assessment, BS was subsequently used by the EU as an effective response to COVID-19, including in Senegal (401).

In Kenya, a 2023 independent evaluation notably reported ‘strong evidence of effectiveness across PLEAD’s three outcomes in assisting Kenyan criminal justice agencies in developing the long-term building blocks for success (402). […] although evidence of higher-level outcome effectiveness was more difficult to find (403).’

For the Enlargement region, EC reporting (annual reports, EAMRs, instrument reporting), EP resolutions, publications by treaty monitoring bodies and intergovernmental organisations’ reports (404) and shadow reporting by international and local think tanks and CSOs, all document unsteady progress in most beneficiaries, at times with stagnations and negative trends in some key areas. These negative trends are typically connected to sensitive external policy issues, and to the fundamentals.

The European Court of Auditors Report on EU support for the rule of law in the Western Balkans (December 2022) (405) states: ‘EU action has contributed to reforms, but has had little overall impact on progress in the rule of law.’

The EC Serbia 2022 Report (406) states that the Serbian government has continued to declare EU membership its strategic goal, but actions need to follow.

The Bosnia and Herzegovina 2022 Report (407) highlights that ‘the poor functioning of the judicial system continued to undermine the citizens’ enjoyment of rights and the fight against corruption. Corruption indicators further deteriorated and all levels of government show signs of political capture directly affecting the daily life of citizens.’

And the Kosovo* 2022 Report (408) states that ‘Overall, corruption is widespread and remains an issue of serious concern. Despite efforts made, there is a need for strong political will to continue to effectively address systemic corruption risks and a robust criminal justice response to high-level corruption.’

As for Türkiye, the 2022 Report (409) identifies serious backsliding in Chapter 11, 23 and 31.

According to previous evaluations (410) and interviews, in some countries (e.g., Tajikistan, Morocco), the EU Trade preferences have some, but limited, leverage on partner countries’ positioning on human rights and democracy (e.g., ratification of international human rights instruments, implementation of national strategies in the areas of human rights and democracy). However, these cases seem to remain the exception in the respective regions.

The meta-evaluation of human rights and democracy thematic projects (2023) (411) overall commends EU support to defending and advancing human rights and democracy. Concrete contributions include: raising awareness, addressing legal issues, defending human rights advocates, supporting electoral processes or advocating on issues that other donors are uncomfortable engaging on where it can maintain its reputation of relative ‘neutrality.’ It further notes that project durations are often too short to bring about systemic change and too often operate on a transactional rather than transformational basis.

Regarding EFSD, it is not easy to determine the amounts mobilised by public investments. The European Court of Auditors highlighted that despite crowding in private sector funding being a key objective of the Fund, data was lacking on the EFSD performance in this area. This reflects a more general challenge to present robust estimates of private sector financial leverage at the approval stage of a blending or guarantee operation or during implementation (412).

The 2020 Implementation report (413) highlighted serious deficiencies in the EFSD results measurement framework.

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(402) Achievements included the areas of strategic planning, development of policy frameworks and documents, practice guidelines, and establishing pathways for Kenyans to access alternative justice mechanisms.
(403) UNODC, Final in-depth evaluation: Strengthening the Administration of Justice and Operationalizing Alternatives to Imprisonment in Kenya, 2023.
(404) Council of Europe monitoring bodies, Parliamentary Assembly and Human Rights Commissioner, OECD, ODIHR, UN UPC, CEDAW, etc.
(405) European Court of Auditors, Special report EU support for the rule of law in the Western Balkans: despite efforts, fundamental problems persist, 2022.
Consultations with stakeholders further highlight:

- According to written EUD contributions, in one low-income Asian country, EU support has been instrumental in driving policy reforms, leading to the formulation of pivotal policy documents. Meanwhile, in a Central Asian country, the potential of EFSD+ to facilitate major investments has offered the EU a unique opportunity to influence sectoral reforms, although it is too early to provide any evidence that this has really happened.
- Virtually all interviews with the EU and CSOs in the Enlargement region point to limited progress with reforms and their actual implementation.
- As evidenced by a range of interviews, consultations and surveys, progress in shaping peace and development is piecemeal due to highly challenging security and governance contexts. The same applies for EU support to peace processes at the regional level where long-lasting support showed its value for bringing Armenia-Azerbaijan to a re-normalisation of dialogue in 2020, though forces beyond the powers of the EU led to the take-over of Nagorno-Karabakh by Azerbaijan in 2023.
- Several EU stakeholders consulted in this evaluation point to a mismatch between EU ambitions (as a development actor) and the overall budgets available to meet the challenges or respond to the multiplicity of crises (particularly in the Neighbourhood and Enlargement regions).

Finding 31 EU agency in deploying the new EFIs can enhance or reduce leverage.

<table>
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<th>L-4.1.1, L-4.1.2, L-4.1.3, L-4.1.4</th>
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</thead>
<tbody>
<tr>
<td>Quality of evidence</td>
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</table>

Statements under this finding are also supported by evidence under previous JC.

Importance of EU agency for leverage

Document review shows:

- The 2023 evaluation of the EU Human Rights Defenders mechanism (414) shows that for promoting human rights and democracy at national level, the EU most effectively leverages governments and other actors when it secures synergies between CSO support and other programmes in support to human rights and democracy.
- An EU survey deployed in the ASEAN region shows that the EU is the first international partner, together with Japan, most trusted to ‘do the right thing’ when it comes to human rights (415).
- Both the IPA III and NDICI-GE regulations (416) include mechanisms to deal with situations where serious regression on human rights and democracy take place. The EU can modulate (IPA III) or suspend (NDICI-GE, IPA III) assistance, circumvent governments to support Non-State Actors directly (NDICI-GE), suspend budget support disbursement tranches and macro-financial assistance (NDICI-GE, Recital 40).
- According to previous evaluations (417) and interviews, in some countries (e.g., Tajikistan, Morocco), the EU Trade preferences have some, but limited, leverage on partner countries’ positioning on human rights and democracy (e.g., ratification of international human rights instruments, implementation of national strategies in the areas of human rights and democracy). However, these cases seem to remain the exception in the respective regions.
- The 2019 evaluation of EU’s strategic engagement in the Central Africa region (418) states: ‘The EU’s strategic response has gradually become autonomous vis-à-vis the context and partners by giving priority to adapting to the changes in its interests, policies and instruments. […] This has improved the strategic coherence and complementarity of EU actions. Nevertheless, the situation has undermined the ownership by beneficiaries, an issue that has repeatedly been raised for several decades for enhancing the effectiveness and sustainability of external aid.’
- Regarding the leverage exerted through the GPGC (DCI), the thematic assessment of Global Challenges (419) notes that: ‘… in particular the EU’s support to education has not always targeted countries most in need. The global education initiatives (Global Partnership for Education, Education Cannot Wait) have been remarkably successful at some levels but they have not been fully resourced to operate at their fullest potential. They have not always been able to address the broader equity

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(414) EC, Final evaluation of the EU Human Rights Defenders mechanism, 2023.
challenges faced e.g., in the least developed countries, especially the ones affected by fragility and protracted crises, or those in the early stages of education system development.’

- When serious regression on human rights and democracy take place, the EU can take several measures, as highlighted above. NDICI-GE further takes on the ‘more for more’ approach, deployed in the Neighbourhood region under DG NEAR purview (420). The 2017 MTE of ENI noted that the incentive mechanism was useful in rewarding and supporting progress in reforms (421), but that it was not able to overcome the lack of political will.

- Under ENI, apart from a few exceptions, such as Jordan, which received additional funding in recognition of its legislative progress, the distribution of the reserve was not made against clear criteria and was used to encourage rather than reward reforms (422). Under NDICI-GE, the allocated 10 % incentive-based reserve were diverted to address the food crisis (2022) and the migration priority (2023) without respecting the Regulation’s principle that the funding should be allocated to reward specific reform progress.

Consultations with stakeholders further highlight:

- Interviews with all stakeholder groups largely confirm the evidence from document review.
- According to an interlocutor there is also potential for more streamlined strategies between Denmark and the EU in the future as not all development-related Danish strategic initiatives in relations to Greenland are currently coordinated with DG INTPA. For example, an interview partner mentioned that a project under the Connecting Europe Facility (CEF) (423) was facilitated by Denmark and ‘did not get anywhere near DG INTPA.’
- In sub-Saharan Africa, EUDs and external partners have expressed their concern that the departure away from the aid effectiveness principles of (full) alignment to country priorities and systems, ownership and mutual accountability could undermine EU’s position as trusted development partner.
- One of the top challenges identified by EUDs in their written contributions is that the new instrument has reduced government buy-in. With the abolition of the NAO office, some EUDs have shared their concern that weaker ownership at the centre of government could backfire and become a principal risk during implementation.
- According to the validation survey, over 80 % of respondents agree that current EFIs contribute to enhancing EU’s leverage to address challenges at country and regional level, and 71 % believe that they have helped the EU to better combine different modalities and tools to promote EU external priorities. Respondents are less unanimous with regard to whether there are good prospects for using EFSD+ guarantees to leverage private finance at country level.

Finding 32 While NDICI-GE and IPA III has allowed more flexibility in the overall approach to regional programming and implementation, it is still uncertain whether the new approach will yield more development leverage.

<table>
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<tr>
<th>Related indicator(s): I-4.1.5, I-4.1.6</th>
<th>Quality of evidence</th>
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<td>Statements under this finding are also supported by evidence under previous JC.</td>
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Opportunities for greater regional cooperation

Document review shows for example:

- The IPA III Regulation (Recital 7) states: ‘Good neighbourly relations and regional cooperation are essential elements of the Enlargement process and are critical for security and stability of the Union as a whole.’ And further continues (Recital 13): ‘As good neighbourly relations and regional cooperation are essential elements of the Enlargement process, assistance should also continue the

\[\text{420}\] EU, Regulation (EU) 2021/947 establishing the NDICI-GE, 2021, Art. 20: ‘Such allocations shall be decided on the basis of their performance and progress towards democracy, good governance and the rule of law including cooperation with civil society, human rights including gender equality, cooperation on migration, economic governance and reforms, in particular those reforms that have been jointly agreed.’ ENI referred only to efforts towards ‘deep and sustainable democracy’ and progress with agreed reforms, see Art.4 of the EU, Regulation (EU) 2014/232 establishing a European Neighbourhood Instrument, 2014.


\[\text{422}\] The shortcomings of the mechanism were clearly identified in the EU, Joint Communication on Eastern Partnership policy beyond 2020: Reinforcing Resilience – an Eastern Partnership that delivers for all, JOIN(2020) 7 final, 2020: ‘The incentive-based approach needs clearer guidance on specific reform priorities, with objective, precise, detailed and verifiable benchmarks.’

\[\text{423}\] CEF is a key EU funding instrument in delivering the European Green Deal and an important enabler towards the Union’s decarbonisation objectives for 2030 and 2050. It supports the development of high performing, sustainable and efficiently interconnected trans-European networks in the fields of transport, energy and digital services.
support for the efforts of the beneficiaries listed in Annex I to advance regional, macro-regional and cross-border cooperation and territorial development, including through the implementation of Union macro-regional strategies.’

- In terms of programming, under IPA III, the EU has launched new regional and CBC interventions to respond to these trends, and it has in parallel increased its strategic communication and public diplomacy efforts. These actions and activities often focus on people-to-people contacts (424).
- Flagship initiatives, such as WBIF investment in railways (425), which cover several beneficiaries, are slowly picking up pace. The Economic Investment Plan (2020) (425) aims to mobilise around EUR 20 billion of investment over the next ten years through the Western Balkans Guarantee Facility. To date, 24 flagship projects worth EUR 3.4 billion have been approved for investment in critical sectors such as rail, road and waterway connections, renewable energy, electricity transmission networks, waste water management, health facilities and broadband infrastructure. These investments will be financed by the EU and bilateral donors, who have pledged EUR 1.2 billion in grants.
- CBC interventions are also foreseen in the NDICI-GE Regulation (427). Up to 5% of the Neighbourhood’s NDICI-GE allocation is to be used to promote links between EU and Neighbourhood countries, based on strategies defined around priorities for smarter, greener, more connected and more social Europe, good cooperation and governance and more secure borders. It is unclear, however, whether this allocation will be fully used as the war in Ukraine has put an end to the CBC programmes with Russia and Belarus reducing the number of programmes from 15 to 7 (428). In the South, the partner countries favour regional cooperation through the MED programme (429), the exception being Italy and Tunisia which are continuing their bilateral CBC funded also under ENI (425).
- According to the Multi-Annual Indicative Programme for the Eastern Neighbourhood and related action documents, a total of 28 actions have been adopted under the regional MIP for the Eastern Neighbourhood 2021-2027. In line with the priorities identified in the regional MIP, the adopted actions cover a wide range of topic, including i) environmental and climate resilience, ii) civil society, democratic participation and gender equality, iii) private sector development and trade, iv) accountable institutions and rule of law, v) digital transformation, vi) transport and connectivity, vii) energy security, and viii) health and education.
- According to the Multi-Annual Indicative Programme for the Southern Neighbourhood and related action documents, 10 actions have been adopted under the regional Multiannual indicative programme 2021-2027. As in the Eastern partnership, the actions cover wide range of topic in line with the priorities identified in the regional MIP, including i) green transition, ii) civil society and democratic participation, iii) economic recovery, iv) accountable institutions and security, v) maritime safety and vi) migration and mobility. In addition, a Neighbourhood South Multi-Country Migration Programme has been adopted with a budget of EUR 573 million for the period 2021-2027.

**Uncertain effects in terms of development leverage**

Document review shows:

- The 2019 evaluation of EU’s strategic engagement in the Central Africa region (431) states: ‘The EU’s strategic response has gradually become autonomous vis-à-vis the context and partners by giving priority to adapting to the changes in its interests, policies and instruments. [...] This has improved the strategic coherence and complementarity of EU actions. Nevertheless, the situation has undermined the ownership by beneficiaries, an issue that has repeatedly been raised for several decades for enhancing the effectiveness and sustainability of external aid.’
- A recent evaluation on EU’s regional support to biodiversity in Central Africa (432) provides one of the more recent examples where the regional intervention mostly turned into multi-country actions (in partnership with the Environment Ministries).

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(424) CSOs are involved regionally through the Civil Society facility (IPA II) and Civil Society Facility and Media Programme (IPA III).
(428) Five CBC programmes (Poland-Ukraine; Hungary-Slovakia-Romania-Ukraine; Romania-Ukraine; Romania- Moldova; Italy-Tunisia) and two transnational (Black Sea Programme; Mediterranean Sea Programme).
(429) ENI CBC Mediterranean Sea Basin Programme (2014-2020) and NEXT MED (2021-2027).
(430) Italy-Tunisia Interreg VI-A NEXT.
• The 2022 Rule of Law and Anti-Corruption evaluation (433) (West Africa case study) also provides a good illustration of why working in partnership with RECs remains challenging, yet equally essential. In West Africa, from 2017 onwards, the EU stopped using ECOWAS as a delivery partner, for due diligence reason and because of significant delays encountered in implementation. The EU’s decision was explained as a necessary step to engage with the regional organisation at a more strategic level. While this decision (based on a pillar assessment approach) was well understood within ECOWAS, the new arrangements under NDICI-GE, which takes away the role of ECOWAS as the EU mandated partner, has been more difficult to explain (434).

• There is limited evidence that the transition to the current EFIs affected the EU’s leverage on human rights and democracy. Under the previous MFF, both the geographic lines and the thematic programme on human rights and democracy made large investments in the capacity of regional organisations to uphold the applicable standards, particularly in Africa. However, these organisations’ limited absorption capacity led to reduction of funding (435).

Consultations with stakeholders further highlight:

• Interviews with all stakeholder groups largely confirm the evidence from document review.

• There is an interest in programmes involving, for example, the Southern Neighbourhood with sub-Saharan Africa or the Gulf States, but so far, there is no example of such collaboration. According to interviews with EEAS, this may be due to the lack of suitable implementation mechanisms to turn this potential into action, as well as the difficulty of overcoming established separate working practices in DG INTPA and DG NEAR.

Finding 33 By fostering the use of blending and guarantees in EU external action, the EFSD and the EFSD+ have expanded the range of tools available to the EU and its partners to address key development challenges. The EU’s move from grant maker to financial catalyst has the potential to enhance development leverage, yet many implementation challenges may interfere.

<table>
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<tr>
<th>Related indicator(s): I-4.1.1, I-4.1.2, I-4.1.3, I-4.1.4</th>
<th>Quality of evidence</th>
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</table>

Statements under this finding are also supported by evidence under previous JC.

Increased focus on guarantees and blending under current MFF welcomed

Document review shows:

• Under the EFSD (i.e., during the period 2017-2020), EU approved EUR 3.8 billion of blending support, EUR 2.1 billion covering sub-Saharan Africa and EUR 1.7 billion the EU Neighbourhood (436).

• The 18 Guarantees signed under the EFSD provided first-hand experience to expand the use of this modality with a broader range of partners and countries / regions under the EFSD+. The EU has guaranteed a volume of EUR 1.55 billion of investment under EFSD during the period 2017-2020. It has approved support for EUR 8.5 billion of guarantees under the EFSD+ under the Open Architecture (OA) although only one guarantee agreement had been signed by October 2023. EUR 13 billion of guarantees is foreseen for the OA for the entire MFF 2021-2027(437).

• By increasing the focus on guarantees and blending under the current MFF, the EU has responded in a substantive way to the need to engage in new forms of financing for sustainable development as highlighted in the 2015 Addis Agenda. The World Bank estimates that countries in sub-Saharan Africa need to invest 7.1 % of their GDP annually in SDG-related infrastructure, but have actually only been investing around half of this level, 3.5 % of GDP(438).

Consultations with stakeholders further highlight:

• Interviews with all stakeholder groups largely confirm the evidence from document review.

(433) EC, Evaluation of the EU support to Rule of Law and anti-corruption in Partner Countries (2010-2021), 2022. West Africa case study.

(434) The case study identifies three main challenges of working at a regional level: (i) mismatch between ECOWAS’s limited capacity and its very broad mandate; (ii) limited buy-in from the ECOWAS member states to participate in regional projects that deal with sovereign, sensitive, issues; (iii) ambivalent or shifting political commitments at national level caused by changes in leadership.


(438) The World Bank, Beyond the Gap: How Countries Can Afford the Infrastructure They Need while Protecting the Planet, 2019.
• Consultations carried out in the context of this evaluation highlight that several EUDs, especially in Middle-Income Countries (MICs), welcome the expanded use of these modalities in EU cooperation with third countries.
• Interviews with financial institutions raised the issue that the high ambition in terms of financial leverage and private sector mobilisation exhibited by the EU under the EFSD and the EFSD+ is far from being proved and not easy to achieve.

Degree of leverage attained will depend on the coherence of objectives, means and approaches under the new EFI architecture

Six core challenges emerge from all sources consulted:
• By 2021, implementation had started for only 43 % of the EFSD blending support approved in 2017-2019 – i.e., EUR 1.3 billion out of EUR 2.9 billion approved in that period (439). The information presented in the EFSD operational reports points to frequent and important delays in the signature of the financial agreements between the EU and the lead DFIs / IFIs (i.e., after the EU contributions have been approved by the board of the relevant EU blending facility). Interviews and recent studies (440) confirm that this pattern affects all regions.

• Analysis of EFSD interventions shows that a large part of the support provided was deployed in relatively stable contexts, including middle-income countries such as Armenia, Egypt, Jordan and Kenya. At a more general level, most DFIs / IFIs are also showing strong risk aversion as underlined in various reports (441) and some observers highlighted that the absence of a strong EC policy steer under EFSD meant that DFIs / IFIs were not 'incentivised to take on more risk (442).'

• Targeted consultations show that DFIs / IFIs and European Financial Institutions are conversant with EU values and policies, and they are ready in principle to follow them. It is too early to assess how EFSD+ conditionalities regarding human rights and democracy will be applied.

• Overall, there has been a lack of synergies between EFSD / EFSD+ interventions and the support provided by the EU or other international partners to partner countries’ sector reforms (see also EQ3 / JC 3.1).

• According to interviews with in-country stakeholders, not enough attention is paid to managing partner countries' expectations carefully. Quote from an interview with counterparts in a partner country: ‘The EIP is a good idea, but it does not work, no money is coming.'

• The provisioning for loans guarantees (whose rates are provided by the NDICI-GE Regulation, and which are funded from geographic budget lines) (443) weighs on the geographic programmes. It is unclear to what extent national partners in these countries have been prepared for this evolution beyond information sharing in the context of consultations related to standard programming processes (see also EQ2 / JC 2.1).

The EU as a constrained investor

Consultations with stakeholders further highlight:
• The EU is well-positioned to exert leverage as a dominant donor and trade partner (especially in the Enlargement region). As an investor on the other hand, the EU faces multiple challenges. The EU competes with other, non-European investors which finalise investment contracts much faster than the EU does (444), and who do not apply conditionalities on the fundamentals.
• According to interviews and targeted consultations, local banks acting as intermediaries are not always interested in the investment projects supported through the EFSD+. Furthermore, investments are implemented under the leadership of the DFIs / IFIs, with limited involvement from the EU. As bankers, IFI project managers feel less concerned by political / policy issues and the fundamentals, which they consider to be outside their remit or on which they do not have sufficient influence.

(439) EC, EFSD Operational Reports from 2017 to 2021.
(440) The findings of the ongoing evaluation of EU blending support in the Enlargement and Neighbourhood regions (not published yet) also highlight the existence of frequent delays at contractualisation stage in these regions.
(444) According to interviewees, the WBIF has been particularly slow.
JC 4.2. EFIs are contributing to reinforcing the EU’s position to effectively address global challenges, including through multilateral frameworks

The analysis under this JC has relied on a variety of sources of information. In addition to the documentary review, the analysis built on the mapping of EU spending actions as well as interviews, targeted consultations and surveys. The main sources used are summarised in the table below.

<table>
<thead>
<tr>
<th>Table 14</th>
<th>Main sources of evidence for JC 4.2</th>
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<tbody>
<tr>
<td><strong>Main sources – documents</strong></td>
<td><strong>Main sources – surveys</strong></td>
</tr>
<tr>
<td>• EFI regulations &amp; programming guidelines, e.g., NDICI-GE Regulation; IPA III Regulation and Programming Framework</td>
<td>• EUD written contributions</td>
</tr>
<tr>
<td>• EFI-level reporting and previous EFI evaluations</td>
<td>• In-country stakeholder survey</td>
</tr>
<tr>
<td>• EU sector guidelines and thematic guidance notes and templates</td>
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<tr>
<td>• Strategic evaluations (thematic, country, regional)</td>
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<tr>
<td>• Strategic programming docs (MIPs, SRs) and AAPs</td>
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<tr>
<td>• Other (e.g., think tank reports)</td>
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Finding 34 The new EFI architecture enables the EU to step up its leadership and make better use of its ability to act as a convenor, honest broker and bridge-builder to address global challenges; however, the EU faces persistent limitations to achieve leverage at global level.

<table>
<thead>
<tr>
<th>Related indicator(s): I-4.2.1, I-4.2.2, I-4.2.3</th>
<th>Quality of evidence</th>
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<tbody>
<tr>
<td>Statements under this finding are also supported by evidence under previous JC.</td>
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The new EFIs create opportunities for greater EU global leverage

Document review shows:

- The MIP for Global Challenges (445) highlights the importance of joint action with EU Member States ‘under a Team Europe approach as a guiding principle of engagement in global challenges to increase its weight, credibility and impact.
- Under 11th EDF, the main entry point for addressing global issues was through the intra-ACP envelope. According to the 2017 MTE (446), this level of cooperation was hindered by ‘limited collective capacity for collective action on global issues.’ At the same time, there was some achievements in selected areas, where the 11th EDF did help promote the ACP voice on the multilateral / global front. For example, intra-ACP was used successfully to help develop a common ACP – EU front ahead of the COP 21 agenda in Paris. The global challenges, as listed in the NDICI-GE Regulation (447), are well covered in the country MIPs (in sub-Saharan Africa), depending on country circumstances. Under NDICI-GE, the regional MIPs remain de facto the main link with global initiatives, with the programme’s

(447) Health; education; gender equality and women’s and girls’ empowerment; children and youth; migration, forced displacement and mobility; decent work, social protection, inequality and inclusion; culture; tackling climate change; sustainable energy; sustainable and inclusive growth, decent jobs and private sector engagement; food and nutrition security; strengthen the role of Local Authorities; promote inclusive societies and multi-stakeholder initiatives, good economic governance, including fair and inclusive domestic revenue mobilisation.
ambition being to ‘leverage the EU’s collective influence and leadership at the global level, as well as enhance the solidarity with partner countries’ (448).

- The largest part of EFSD and EFSD+ funding is directed towards responding to the infrastructure gap observed in many regions, thereby addressing an important bottleneck for the achievement of several SDGs (449). The interventions implemented under the Global Challenges thematic programme are not building on the experience gained in EFSD interventions (450).

- Evidence from the Neighbourhood suggests that without the support of development finance, it would be difficult for the EU to make a difference on global challenges, as illustrated by the Multi-Country Migration programme for the Southern Neighbourhood, whose budget remains insufficient to address the needs.

- The EU-Morocco Green Partnership shows how political dialogue and cooperation can be combined to tackle global challenges in cooperation with a partner country sharing the same ambitions. The Green Partnership, which the EU and Morocco signed in 2022, aims at achieving common goals of transitioning to a green economy and becoming low-carbon, climate-resilient economies. It is the first Green Partnership the EU signs with a partner country and is expected to become a model for similar partnerships on the African continent (451). From a multilateral perspective, it served as an important political statement demonstrating the shared commitment and aspirations of the EU and Morocco regarding climate change and the green transition, sending a strong signal to other countries in the region ahead of COP27 in November 2022. The Partnership builds on previous efforts under ENI, where the EU already supported Morocco's environmental strategy (‘Plan Maroc Vert’).

- As reflected in the Civil Society Roadmaps, EU’s strategic alliances include CSOs in the partner countries, international / regional organisations, and international / EU-based CSOs, Local Authorities and intergovernmental bodies. Thanks to strategic partnership with these actors, as well as to the commitments of the EU Member States and of relevant institutions in partner countries (e.g., NHRIs, Parliament, line Ministries…), the EU is sometimes in a position to lead or play a strong role in strategic alliances for human rights and democracy, and in expanding CSO’s contribution to sector-level policy dialogue, as was observed in the 2023 Country Strategic Evaluation Guatemala (452) in several sectors.

- The INSC contributes to the Commission’s cooperation with the IAEA, the EBRD and the G7 NSSG in addressing global challenges related to nuclear safety and security (453). For example, by contributing to continued cooperation under the JCPOA despite geopolitical challenges and tensions, INSC’s work in Iran has illustrated the constructive role that the instrument plays within the existing international legal framework.

Consultations with stakeholders further highlight:

- Interviews with all stakeholder groups largely confirm the evidence from document review.

- Feedback from EUDs regarding the leverage of NDICI-GE in terms of addressing global challenges is mixed. While some EUDs believe that the new instrument enhances the EU’s global presence and attractiveness as a partner compared to other global actors, others express reservations about its effectiveness and impact. Based on the validation survey results, only 23 out of 60 EUDs perceive that the present EFIs make a significant or moderate contribution to enhancing the EU’s capacity to extend the external dimension of its internal policies in HICs and MICs. Slightly more (29) strongly or somewhat agree that the current EFIs (including the use of public diplomacy) make the EU an attractive partner compared to other global actors. At the same time, a clear majority strongly or somewhat supports the notion that the current EFIs contribute to enhancing the EU’s leverage to address challenges at country and regional level (45) and to strengthening the EU’s ability to address global challenges, resulting in a stronger global voice in the world (40).

- According to interviews and written contributions from EUDs and thematic units in headquarters, EUDs are progressively engaging with a diverse range of civil society in partner countries, around the political, policy and cooperation issues relevant to the respective country and regional MIPs. This is in line with the guidance developed in 2020 by the (then DG DEVCO) Thematic Unit on mainstreaming

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(450) Given the early stage of implementation of EFSD+, it is too early to expect that other EU interventions build on this experience. However, bridges to ensure cross-fertilisation could be foreseen, but there is no evidence of such a forward-looking approach.


Civil Society engagement into EU Cooperation and external relations, in preparation for the current MFF (454).

Persisting limitations to achieving leverage at global level

Document review shows:

- The 2017 MTE of ENI (455) highlights that the fragmentation of instruments and programmes made it challenging to develop a comprehensive and coordinated approach to addressing global challenges such as climate change, biodiversity, migration or the fight against terrorism.
- Recent evaluations (456) pointed to some success in linking up local, national, regional and global ‘green and smart cities’ initiatives.
- A mapping of the regional MIP’s (sub-Saharan Africa) (457) 40+ decisions conducted by the Evaluation Team shows that about half of the decisions indeed refer to relevant global initiatives / multilateral frameworks in their objectives and actions, in particular with regard to refugees, climate and desertification, smart and clean cities, education, global trade and financial standards.
- At the level of action documents, linkages can be observed between interventions at global, regional and bilateral level, particularly in terms of addressing the SDGs.

  - According to Neighbourhood East and South action documents at country and regional level, geographic programmes appear to make a significant contribution to SDGs.
  - At country level, the multiannual programme ‘EU for Decent Life (Haya Karima) – Combatting Multidimensional Poverty in Rural Areas in Egypt’ (EUR 50 million) addresses many of the challenges covered by the Agenda 2030, such as the eradication of poverty, water and sanitation, gender equality, decent and sustainable jobs and the fight against climate change. The ‘Egypt Food Security Facility’ (EUR 100 million) is a direct contribution to SDG 2 (achieve food security and improved nutrition). It is also contributing to one of areas of intervention of the NDICI-GE thematic programme Global Challenges (ensuring equitable access to food including by helping to address the financing gap for nutrition).
  - At regional level, the actions programmed under the MIPs for the Neighbourhood South and the Neighbourhood East intervene across a wide range of areas, which overlap with many global challenges. For example, the regional multi annual action plan ‘Accelerating the clean energy transition for a greener and fairer economic recovery in the Southern Neighbourhood’ contributes to SDG7 (Affordable and clean energy), which is also one of the areas of intervention of the Global Challenges (GC) thematic programmes (sustainable energy). The Neighbourhood South Multi-Country Migration Programme addresses the objective of the GC programme on migration defined in the Regulation (458).

- However, a review of programming documents across all instruments and pillars shows that while these links between global, regional and country programmes are clear from the documents, there is a lack of cross-referencing, suggesting that a coordinated and comprehensive approach across levels of intervention is missing.

Consultations with stakeholders further highlight for example:

- Interviews with all stakeholder groups largely confirm the evidence from document review.
- Interviews with stakeholders across all regions confirm the lack of a coordinated approach in the use of the Global Challenges programme.
- Half of respondents to the validation survey were of the view that the new EFIs had resulted in increased involvement of line DGs in geographical programming, with about 40 % disagreeing and 10 % expressing no view.
- Interviews with line DGs suggest that information flows were adequate, yet effective collaboration was hampered by unequal levels of thematic expertise between DG INTPA and DG NEAR.

JC 4.3. EFIs have enabled EU’s role as a geopolitical actor

The analysis under this JC has relied on a variety of sources of information. In addition to the documentary review, the analysis built on the mapping of EU spending actions as well as interviews, targeted consultations and surveys. The main sources used are summarised in the table below.

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(456) EU, Mid-term Evaluation: the third phase of the Participatory Slum Upgrading Programme (PSUP III), 2023.
(458) EU, Regulation (EU) 2021 / 947 establishing the NDICI-GE, 2021. Annex III, Recital 5: ‘Ensure continued Union leadership in shaping the global agenda on migration and forced displacement governance in all its dimensions, particularly to facilitate orderly, safe, regular and responsible migration.’

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Table 15  
Main sources of evidence for JC 4.3

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<tr>
<th>Main sources – documents</th>
<th>Main sources – surveys</th>
<th>Main sources – interviews &amp; targeted consultations</th>
<th>Other sources</th>
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• EFI-level reporting and previous EFI evaluations;  
• EU sector guidelines and thematic guidance notes and templates  
• Strategic evaluations (thematic, country, regional)  
• Strategic programming docs (MIPs, SRs) and AAPs  
• Other (e.g., think tank reports) | • EUD written contributions  
• In-country stakeholder survey | • Interviews: EU HQ, EUDs, IOs and international CSOs, in-country stakeholders (authorities, CSOs), European Development Financial Institutions / IFIs and EU Member States (HQ, local representatives) | - |

Finding 35 Building on the PI’s logic and approach followed under the previous MFF, NDICI-GE ensures some continuity in the pursuit of interest-driven cooperation and EU leverage as geopolitical actor.

Related indicator(s): I-4.3.1, I-4.3.2

Quality of evidence ▶

Statements under this finding are also supported by evidence under previous JC.

Document review shows:

- The PI’s objective to ‘advance and promote Union and mutual interests’ with third countries (Art. 1) is reflected in NDICI-GE’s general objective to ‘uphold and promote the Union’s values, principles and fundamental interests worldwide’ (Art 1.a) and ‘respond rapidly to Union foreign policy needs and priorities’ (Art 2.d.III.).
- Annex 4 of the NDICI-GE Regulation spells out criteria defining the global dimension of interventions under the Foreign Policy Needs component (RR-FPN) specifying that they should enable the EU to act ‘where there is an urgent or imperative foreign policy interest, or a window of opportunity to achieve its objectives, requiring a rapid reaction and which are difficult to address by other means.’
- As a follow-up to the PI, the NDICI-GE Geographic pillar allows FPI to enable the EU to pursue its strategic interests and values in its partnerships with High Income Countries (HICs). As evidenced by the FPI Management Plan 2022 (459), the RR-FPN took over from the PI in terms of developing common approaches with key partners to influence international processes, agendas, thereby underpinning multilateralism, fostering the building of partnerships and alliances in a global context, and contributing to the rules based global order. It does so by supporting (trade) negotiations, policy dialogues and political agreements with HICs.
- The 2022 FPI AAR (460) noted that in 2022, the PI influenced policy and political processes in line with EU interests contributing to developing mutually beneficial relationships with partner countries.
- The JOINT STAFF WORKING DOCUMENT ‘Main outcomes of the mapping of external financial tools of the EU’ brings to light potential synergies between ECA financing activities and development objectives and, by extension, potential opportunities that are worthwhile exploring. These synergies will strengthen the EU leverage as a political actor.

Consultations with stakeholders further highlight:

- Interviews with all stakeholder groups largely confirm the evidence from document review.
- Interviews with FPI raised the issue that the partnership approach based on EU interests as it existed in FPI has partly diluted in the move from PI to NDICI-GE. This is because DG INTPA, which took over

some aspects previously under the PI, has a different approach to FPI that makes much more room to partner countries’ demands, with EU objectives reportedly more on the side-lines.

- Conversely, interviewees at DG INTPA stress they have now more room to act on EU interests than in the past, for example on critical raw materials or the Green Deal. They ensure that there is a strong overlap of interests before doing anything in a partner country. The whole narrative and perspective have thus changed as it is more geopolitical. However they also recognised that ways of working remain very different (e.g., more long-term timeline for DG INTPA) and have a strong attachment to existing procedures.

- According to interviewees with the EEAS, if RR-FPN was used purely for highly relevant foreign policy needs (i.e., shared between the EEAS and the EC), the tool could help to really leverage the geopolitical capacity of the EU with limited resources. However its value is limited if, as one interviewee put it, it is used as a ‘back-up plan because others did not see [the action] as a priority.’

- DG INTPA staff mentioned a past programme (e.g., ELAN, ended in 2017) which was considered as a successful example of how DG INTPA (DEVCO at the time) pursued EU and mutual interests with partner countries. However, at the time of the PI, this programme was discontinued, despite a request for continuation. Thus, in DG INTPA’s view, having the possibility to finance actions related to EU interests in its geographic envelope now gives it more room for manoeuvre and flexibility.

- EUD written contributions highlighted the fact that the policy dialogue and public diplomacy support facilities worked particularly well for alignment and cooperation between the EU and third countries in areas of EU strategic interests. They also highlighted that NDICI-GE overall brings notable value and positive impact to public diplomacy activities and that the transition was smooth in that regard.

- According to EUDs concerned, the funding for HiCs recognises the importance and leverage of cooperation with like-minded partners and economic leaders, especially in areas where the EU seeks to assert its influence and leadership. EUDs consulted through the validation survey in Australia, Canada, New Zealand and United States reported positively on the support facilities, highlighting their usefulness for explaining EU policies and transforming them in cooperation opportunities.

- According to interviews, the scale up from the EFSD to the EFSD+ in terms of volume of guarantees available allows the EU to bring an even more credible response to the growing SDG financing gap, and several of the concrete challenges partner countries face in practice strengthening the EU’s role as a geopolitical actor. At the same time, a few factors may limit the EFSD+ in further supporting EU’s role as a geopolitical actor, including strategic, visibility, and communication issues.

**Finding 36** The enabling environment for the realisation of the RR-FPN’s added value is not always available; this situation is an unexpected result of the Geographisation principle, but is also partly due to the siloed approaches under the new NDICI-GE division of labour.

*Related indicator(s): I-4.3.1, I-4.3.2*  

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<tr>
<th>Quality of evidence</th>
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Statements under this finding are also supported by evidence under previous JC.

Document review shows:

- The MIPs for the PI acknowledged the changing environment and the acceleration of some global trends. In an increasingly ‘multi-polar’ world, the creation of the PI assumed that the EU would ‘need to think even more than today in terms of forging bilateral and multilateral partnerships to advance its strategic interests (461).’ The PI has been designed to support the EU’s efforts to create and maintain such partnerships.

- Linking the promotion of its values and interests with specific cooperation activities, the PI was meant to add credibility and consistency to the EU’s external policy and thus support the EU’s ambition to reinforce its position as a key political and economic player on the international scene both bilaterally and within multilateral bodies.

- The Coherence report 2017 (462) and a review of the MIPs for PI (2014-2017 and 2018-2020) highlighted the fact that by pursuing the EU’s strategic interests globally (i.e., its remit covered potentially all third countries) and in various fields (e.g., the security of the EU’s energy supply, business opportunities) PI enabled the EU to adopt a more realistic and interest-driven approach to external action.

- A key aspect of the PI was to promote a better understanding of the EU actions and positions on worldwide priorities, for example tackling climate change and secure access to sustainable energy. It did so through the use of the tools of advocacy and public persuasion / diplomacy.

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• The 2017 report by the Authorising Officer by sub-Delegation (463) notes that the focus of the instrument is on influencing processes through facilitation and support, and to increase EU capacity to impact policy making. Examples of processes influenced are contained in AOSD reports (464). In this regard, the 2017 MTE of PI (465) found that the PI has often played a critical enabling role, strengthening cooperation / dialogue and opening up areas for cooperation / dialogue. This catalytic effect of the instrument was reflected in a new Partnership Instrument intervention logic and a set of core PI indicators. In a medium- to long-term perspective, the processes, dialogues and cooperation that are enabled through PI cooperation are expected to contribute to specific FPI results indicators and therefore to the role of the EU as a political, economic and cultural power.

Consultations with stakeholders further highlight:

• Interviews with some EU staff highlighted the fact that while the PI was the first instrument talking about EU interests openly and breaking a taboo, this element is now somehow diluted because Geographicalisation prevails. The gap is particularly visible in MICs.
• INTPA staff highlighted a few positive examples relating to connecting EU internal priorities with its external dimension; this includes the fact that several interventions under the current MFF are related to EU interests (e.g., CRM, Green deal etc.).
• In their written contributions, several EUDs (mostly from MICs and HICs) highlighted the challenges in terms of coordination and synergies created by the division of labour between EC services under the current MFF. An EUD wrote: ‘the artificial separation of MICs and HICs appears to be rather counterproductive to increase regional coherence and resulted in more silos, less communications and less opportunities to gather partners and stakeholders together as part of much needed multi-country approaches.’
• According to EU staff working on the Americas, inter-institutional tensions have been pronounced at the start of the MFF, delaying the finalisation / approval of new actions focussing on advancing EU interests in the region.

Finding 37 The EU increasingly seeks to achieve geopolitical leverage through the geographic and thematic instruments, yet contextual realities in terms of reconciling the EU’s triple role (as development partner, global player and geopolitical actor) largely determine whether leverage can eventually be achieved.

<table>
<thead>
<tr>
<th>Related indicator(s): I-4.3.1, I-4.3.2</th>
<th>Quality of evidence</th>
</tr>
</thead>
</table>

Statements under this finding are also supported by evidence under previous JC.

Document review shows:

• The recent evaluation of EU-UN cooperation (466) points out that while in most cases the EU and its EU Member States were largely cohesive in UN central organs, they did not fully capitalise on their joint financial and political leverage, despite being jointly the biggest financial contributor to the UN. Beyond the challenges of speaking with ‘one voice’, the EU was not able to fully leverage the potential for influence of its funding, both from EU and jointly with EU Member States. A key issue was the availability of information. EUDs to UN HQs reported not having a clear overview of what the EU, let alone its Member States, was implementing on the ground, in each country and sector. They could thus not ensure sufficient leveraging on EU funding in their diplomacy efforts.
• Evidence collected on EU engagement in sub-Saharan Africa (both from documentary sources and interviews) suggests that the financial and political influence that the EU obtains through its assistance is not sufficiently used to make the EU’s voice heard at global level, although there are examples of successful partnerships to tackle global challenges with countries that share the same ambition.
• Many different sources (including from EUDs operating in different contexts) point to the thin enthusiasm of many partner countries for the policy and legislative reforms promoted by global initiatives, the diminishing importance of ODA, the competition from other global players and the decreasing acceptance of the Western liberal democratic model of development. All of these factors put structural limitations on EU leverage.
• The Regional MIP for Asia and the Pacific includes a EUR 135 million envelope to cover: ‘Gulf Countries, High Income Countries and other Key Partners (including public diplomacy for India and

(464) EC, Template for Authorising Officer by Sub-delegation report on FPI.4 – Headquarters Budget lines 19.05 and 19.010408, 2018.
China). The Regional MIP for the Americas and the Caribbean includes a EUR 65 million to cover:
'HICs (i.e., US and Canada) and public diplomacy for Argentina, Brazil and Mexico.'

Consultations with stakeholders further highlight:

- Interviews with all stakeholder groups largely confirm the evidence from document review.
- Representatives of CSOs and UN actors pointed to insufficient budgets being devoted to issues in their interviews and OPC contributions.
- Interviews with FPI revealed several points which were possible under the past PI and cannot be done via the RR-FPN any longer: due to many demands from different EU services and the EUDs, RR-FPN has been oversubscribed in the sense of being stretched in budgetary terms but also because of its remit. RR-FPN is now dealing with too many different types of requests: on the one hand, it is expected to provide rapid response to urgent foreign policy needs / priorities and, on the other hand, to deal with diverse requests concerning the cooperation with HICs, including public and cultural diplomacy.
- Based on the validation survey findings, only 23 out of 60 EUDs perceive that the present EFIs make a significant or moderate contribution to enhancing the EU's capacity to extend the external dimension of its internal policies in HICs and MICs. Slightly more (29) strongly or somewhat agree that the current EFIs (including the use of public diplomacy) make the EU an attractive partner compared to other global actors. At the same time, a clear majority of EUDs strongly or somewhat supports the notion that the current EFIs contribute to enhancing the EU's leverage to address challenges at country and regional level (45) and to strengthening the EU's ability to address global challenges, resulting in a stronger global voice in the world (40).
Annex 2 – Evaluation matrix

**EQ1 – Responsiveness to EU and partner countries’ policy priorities (including overall relevance and coherence)**

**EQ1**: To what extent have the External financing instruments (EFIs) been translated into a programming process and other measures that reflect and respond to the evolution of EU political and policy priorities as well as the priorities and needs of partner countries?

<table>
<thead>
<tr>
<th>Dimension (JC)</th>
<th>Overall issue to assess (indicator)</th>
<th>Disaggregated key issues</th>
</tr>
</thead>
</table>
| JC 1.1 EFIs are coherent with EU policy framework and related programming and other measures are aligned with objectives / priorities set in the regulations | I-1.1.1 Relevance and overall coherence of objectives / priorities set in the regulations (NDICI-GE, IPA III, DOAG, INSC) with EU political and policy priorities, including the positioning of EFSD+ / EAG in the wider set of EU external action financing instruments | - Coherence with EU priorities  
- Positioning of EFSD+ / EAG |
| JC 1.1.2 Horizontal and thematic (spending) targets: i) coherence (clarity of the linkages) with EU policy priorities; ii) trends in programming / delivery | I-1.1.2 Integration of lessons from previous instruments regarding clarity of objectives / priorities (including targets) and overall coherence with EU policy framework | - Definition of the target  
- Achievement of the target |
| JC 1.1.3 Integration of lessons from previous instruments regarding clarity of objectives / priorities (including targets) and overall coherence with EU policy framework | I-1.1.3 Integration of lessons from previous instruments regarding clarity of objectives / priorities (including targets) and overall coherence with EU policy framework | - Previous EFIs (internal coherence)  
- Integration of lessons on coherence  
- Integration of lessons on targets |
| JC 1.2 The new set of EFIs has translated into enhanced strategic focus of EU programming and non-programmable actions in line with the Policy first approach | I-1.2.1 Programming (in sampled countries) more explicitly articulated around EU priorities, values and interests, including programming under EFSD+ | - Priorities in bilateral programming  
- Priorities in regional programming  
- EFSD+ programming |
| JC 1.2.2 EFIs have enabled political / policy dialogue and strategic communication and public diplomacy with EU partners about EU priorities and interests | I-1.2.2 EFIs have enabled political / policy dialogue and strategic communication and public diplomacy with EU partners about EU priorities and interests | - Dialogue and public diplomacy |
| JC 1.2.3 The extent to which the EU and its partners have a shared understanding of the Policy first approach | I-1.2.3 The extent to which the EU and its partners have a shared understanding of the Policy first approach | - Share understanding |
| JC 1.2.4 Mainstreaming in line with EU priorities (including use of targets as a strategic tool) | I-1.2.4 Mainstreaming in line with EU priorities (including use of targets as a strategic tool) | - Quality of mainstreaming |
| JC 1.2.5 Integration of lessons from previous instruments regarding strategic focus of programming and integration of EU’s evolving policy and political priorities in programming | I-1.2.5 Integration of lessons from previous instruments regarding strategic focus of programming and integration of EU’s evolving policy and political priorities in programming | - Previous EFIs (strategic focus)  
- Integration of lessons on the Policy first approach |
| JC 1.3 The new set of EFIs has translated into a stronger partnership approach with authorities and other stakeholders from partner countries and regions | I-1.3.1 Quality of dialogue / consultations with the authorities from partner countries and regions to identify areas of mutual interests and alignment (including consultations during programming), including integration of relevant national priorities and sector policies under IPA III specific programming processes | - Participation of national authorities  
- Alignment with national priorities |
| JC 1.3.2 Strength of partnerships with other country / regional stakeholders (including CSO, LA, private sector) aimed at ensuring meaningful participation in programming, implementation and monitoring processes | I-1.3.2 Strength of partnerships with other country / regional stakeholders (including CSO, LA, private sector) aimed at ensuring meaningful participation in programming, implementation and monitoring processes | - Partnership with stakeholders |
| JC 1.3.3 Perceptions by stakeholders of the Geographisation principle of EU external action as a vehicle to ensure better responsiveness to partner country / regional realities and priorities | I-1.3.3 Perceptions by stakeholders of the Geographisation principle of EU external action as a vehicle to ensure better responsiveness to partner country / regional realities and priorities | - Geographisation principle (perceptions) |
| JC 1.3.4 The application of the Geographisation principle under NDICI-GE is based on a clear assessment of needs, risks, and the feasibility of interventions (e.g., through risk analysis, political economy or conflict analyses) while ensuring ‘a fair share’ to the different themes, sectors and actors (including in terms of addressing global threats and challenges) | I-1.3.4 The application of the Geographisation principle under NDICI-GE is based on a clear assessment of needs, risks, and the feasibility of interventions (e.g., through risk analysis, political economy or conflict analyses) while ensuring ‘a fair share’ to the different themes, sectors and actors (including in terms of addressing global threats and challenges) | - Understanding of needs and context |
EQ2 – Efficiency and flexibility in programming and delivery

EQ2: To what extent have programming and delivery gained in efficiency and flexibility between the previous and current MFFs?

<table>
<thead>
<tr>
<th>Dimension (JC)</th>
<th>Overall issue to assess (indicator)</th>
<th>Disaggregated key issues</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>JC 2.1</strong> Enabling environment for establishing and practicing new ways of working, fit to optimally implement the NDICI-GE and IPA III regulations</td>
<td>I-2.1.1 Provision and level of understanding of timely guidance and training to take up new ways of working under the EFIs, in particular for EFSD+ and IPA III</td>
<td>Guidance and training</td>
</tr>
<tr>
<td></td>
<td>I-2.1.2 Level of understanding (and perception) within the EU of budgetisation of EDF and the abolition of the NAO role, and examples of how these are processed through programming and delivery</td>
<td>EDF budgetisation</td>
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<tr>
<td></td>
<td>I-2.1.3 Level of understanding (and perception) of the new thematic and country programming logic underlying IPA III, and examples of how this logic is processed through programming and delivery when faced to emerging crises</td>
<td>IPA countries vs thematic programming</td>
</tr>
<tr>
<td></td>
<td>I-2.1.4 Establishment of new and well-understood governance mechanisms for the ESFD+, its programming and risk management and the speed of its set up.</td>
<td>EFSD+ mechanisms</td>
</tr>
<tr>
<td></td>
<td>I-2.1.5 The new EFIs facilitate an effective dialogue and collaboration with line DGs (e.g., CLIMA, ENV, HOME, AGRI, TRADE, REGIO, and others as applicable) to combine EU internal and external action priorities</td>
<td>Collaboration at EC level</td>
</tr>
<tr>
<td><strong>JC 2.2</strong> Transaction costs are reduced as a result of EFI streamlining and simplification</td>
<td>I-2.2.1 Benefits of the new EFI architecture in terms of more efficient programming processes (including degree of use of harmonised and simplified templates, instructions / timeline, etc.)</td>
<td>Efficient (Cost / Time) programming</td>
</tr>
<tr>
<td></td>
<td>I-2.2.2 Simplification and streamlining of decision-making processes (i.e., simplified and clearer mechanisms for interactions between internal actors and with external stakeholders on key decisions during programming and delivery)</td>
<td>Interactions and decision-making</td>
</tr>
<tr>
<td></td>
<td>I-2.2.3 Adoption and utilisation of more efficient internal reporting and accountability procedures.</td>
<td>Internal reporting and accountability</td>
</tr>
<tr>
<td><strong>JC 2.3</strong> The EU is increasingly able to flexibly respond to crises and emerging challenges at local, country, regional and global level</td>
<td>I-2.3.1 Timing and precision of the use of the non-programmable rapid response funding for: i) situations of crisis, instability and conflict; ii) resilience challenges; and iii) EU foreign policy needs and priorities</td>
<td>Use of the Rapid Response pillar</td>
</tr>
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<td></td>
<td>I-2.3.2 Clarity of the rationale of mobilisation of funds from carry-overs, and from the &quot;emerging challenges and priorities ‘cushion’ to respond to unforeseen circumstances, new needs or emerging challenges and new Union-led international initiatives</td>
<td>Use of the cushion for flexibility</td>
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<td></td>
<td>I-2.3.3 Identification by the services of lessons learnt with the EU attempts to efficiently and flexibly respond to the COVID-19 and the war in Ukraine</td>
<td>Learning in response to global crises</td>
</tr>
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<td></td>
<td>I-2.3.4 Degree to which the top-ups, and the ‘emerging challenges and priorities cushion’ guarantee additional resources for the ‘human rights and democracy’, the ‘civil society organisations’ and the ‘global challenges’ thematic programmes (467)</td>
<td>Cushion for thematic programmes</td>
</tr>
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</table>

## I-2.3.5 Integration of lessons from previous instruments regarding flexible responses to crises and emerging challenges, both at country and cross-border levels

<table>
<thead>
<tr>
<th>Dimension (JC)</th>
<th>Overall issue to assess (indicator)</th>
<th>Disaggregated key issues</th>
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<tbody>
<tr>
<td>JC 3.1</td>
<td>The new EFIs have strengthened the whole-of-EU approach which the previous EFIs already sought to achieve</td>
<td>I-3.1.1 Degree to which EFIs have facilitated / incentivised coherence and synergies within individual EFIs</td>
</tr>
<tr>
<td></td>
<td></td>
<td>I-3.1.2 Degree to which EFIs have facilitated / incentivised coherence and synergies with other external instruments, (including CFSP, humanitarian aid and off-budget EPF, as well as INSC and NDICI-GE on CBRN, and consistency of NDICI-GE on CBSD)</td>
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<td></td>
<td>I-3.1.3 Degree to which EFIs have facilitated / incentivised coherence and synergies with internal policies / programmes</td>
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<td></td>
<td>I-3.1.4 Degree to which EFIs have facilitated / incentivised coherence and synergies with other European actors, including EU DFIs / IFIs as well as European actors of joint (e.g., Team Europe) initiatives (468)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>I-3.1.5 Coherence between the NDICI-GE and IPA regulations / programming priorities, and new EU policy initiatives such as the Global Gateway and the Investment Plans</td>
</tr>
<tr>
<td>JC 3.2</td>
<td>EU’s programming and delivery is increasingly coherent and synergetic with the priorities of other actors</td>
<td>I-3.2.1 Coherence of EU support provided under the EFIs with the efforts of continental / regional organisations</td>
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<td></td>
<td>I-3.2.2 Coherence of EU support provided under the EFIs with the efforts of non-EU external actors / donors / International Organisations</td>
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<tr>
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<td>I-3.2.3 Integration of lessons from previous instruments regarding responses to coherence and synergies with other actors</td>
</tr>
<tr>
<td>JC 3.3</td>
<td>The EFIs have increasingly contributed to strengthened EU added value</td>
<td>I-3.3.1 EU added value provided in terms of size of engagement, critical mass, particular expertise or weight in advocacy and political leverage</td>
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<tr>
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<td></td>
<td>I-3.3.2 EU added value provided in terms of being able to engage at different levels (global, regional, national and local) and ensure coherent approaches</td>
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<td></td>
<td>I-3.3.3 EU added value in terms of promoting values (democracy, human rights, rule of law) in the prevailing international environment (both under the previous and current EFI architectures)</td>
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<td>I-3.3.4 Degree to which EFIs have facilitated / incentivised the sharing of European reform approaches and good practices</td>
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(468) Including coherence and synergies with actors such as EBRD in the area of nuclear safety.
**EQ4 – EU’s leverage to achieve expected results**

**EQ4: To what extent have the EFIs strengthened EU’s leverage to achieve the expected results of EU external action?**

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<tr>
<th>Dimension (JC)</th>
<th>Overall issue to assess (indicator)</th>
<th>Disaggregated key issues</th>
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<tbody>
<tr>
<td>JC 4.1</td>
<td>The EFIs have enabled EU’s role as a major development cooperation partner</td>
<td>• Effects on Policy reform</td>
</tr>
<tr>
<td></td>
<td>I-4.1.1 Degree to which EFIs increased EU leverage on policy reforms and transformational change, including through incentive-based approaches (e.g., linked to accession dynamics or the application of the ‘more for more’ principle in the Neighbourhood South region)</td>
<td></td>
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<tr>
<td></td>
<td>I-4.1.2 Degree to which EFIs are likely to contribute to strengthened responses at regional level (including cross-border responses in the Enlargement and Neighbourhood context)</td>
<td>• Effects at regional / multi-country level</td>
</tr>
<tr>
<td></td>
<td>I-4.1.3 Degree to which EFIs enabled to link specific modalities (guarantees, blending, trust funds, budget support) and national development processes</td>
<td>• Opportunities created by modalities</td>
</tr>
<tr>
<td></td>
<td>I-4.1.4 Degree to which EFIs increases EU’s financial leverage, particularly in relation to the EFSD+ and External Action Guarantee while ensuring inclusive development outcomes</td>
<td>• Financial leverage</td>
</tr>
<tr>
<td></td>
<td>I-4.1.5 Adequacy of learning and monitoring systems measuring EU contribution to cooperation objectives reflected in applicable results frameworks</td>
<td>• Results monitoring and learning</td>
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<td></td>
<td>I-4.1.6 Integration of lessons from previous instruments regarding EU (financial) leverage</td>
<td>• Previous EFIs (bilateral / regional level)</td>
</tr>
<tr>
<td>JC 4.2</td>
<td>The EFIs are contributing to reinforcing the EU’s position to effectively address global challenges, including through multilateral frameworks (469)</td>
<td>• Approach to global challenges</td>
</tr>
<tr>
<td></td>
<td>I-4.2.1 Coherence of objectives, means and approaches to addressing global challenges across the levels of intervention (global, regional, country, local) under the new EFI architecture, including integration of multilateral frameworks such as the 2030 Agenda for Sustainable Development and the Paris Agreement on climate change</td>
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<td></td>
<td>I-4.2.2 The EFIs facilitated better EU responses to global challenges, amongst others by forging strategic alliances with partner countries and regions at various levels</td>
<td>• Strategic alliances</td>
</tr>
<tr>
<td></td>
<td>I-4.2.3 Integration of lessons from previous instruments regarding EU (financial) leverage</td>
<td>• Previous EFIs (global level)</td>
</tr>
<tr>
<td>JC 4.3</td>
<td>The EFIs have enabled EU’s role as a geopolitical actor</td>
<td>• Interest-driven approach</td>
</tr>
<tr>
<td></td>
<td>I-4.3.1 EFIs enable the EU to pursue a more realistic and interest-driven approach to external action</td>
<td></td>
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<tr>
<td></td>
<td>I-4.3.2 EFIs enable the EU to increase its global influence, power using different strategies, approaches and tools</td>
<td>• Global voice</td>
</tr>
</tbody>
</table>

(469) This judgement criterion also applies to the IPA context. The IPA III Regulation clearly states that the Enlargement policy and related EFI is a “strategic investment in peace, security, stability and prosperity in Europe’ and should allow the ‘Union to be better positioned to address global challenges’ (see Art. 5 of the IPA III Regulation).
Annex 3 – Overview of consultations

Semi-structured interviews

An extensive round of semi-structured interviews (e.g., via online platforms such as Microsoft Teams) was carried out throughout the evaluation. The Evaluation Team has conducted consultations with 344 key informants and consulted with EU staff at HQ, including DG INTPA, DG NEAR and FPI, as well as other EC services (several line DGs), EEAS, EUDs / Offices and Civil Society Organisations (CSOs) representatives (see Figure 4 below). The Team also expanded its outreach after the desk phase to additional key informants at EU HQ and EUD levels, as well as to external stakeholders (e.g., representatives from UN agencies, EU Member States, national partner governments, international CSOs and in-country CSOs).

Figure 4  Overview of interviewees per stakeholder category

Out of the 344 persons consulted, some of which several times and at different stages of the evaluation, 44 % of respondents were from EU HQ. Among them, the majority belongs to DG INTPA (53 %), followed by DG NEAR (23 %), EEAS (14 %) and FPI (10 %).

The second biggest category of interviewees is ‘EU HQ – other’ (14 % of the total of persons interviewed), which corresponds to line DGs, namely DG AGRI, DG BUDG, DG CLIMA, DG CNECT, DG DEFIS, DG ECFIN, DG ECHO, DG ENER, DG ENV, DG GROW, DG HOME, DG JUST, DG REGIO, DG TRADE, as well as respondents from EC SG.

Respondents from IOs and international CSOs represent 13.4 % of the people consulted and includes think tanks; UN agencies, regional organisations, research institutes and fora for international cooperation.

Other EU actors include EUDs, which represent 12.2 % of people interviewed, mostly from the sample countries (470), EU Member States (4.1 %) and European Development Financial Institutions / IFIs (7 %).

Finally, the team conducted 18 interviews with in-country stakeholders (authorities, CSO), accounting for 5.2 % of the total of interviews.

Online Public Consultation (March-June 2023)

Three online consultations / surveys were deployed in the context of this evaluation. The first was an Open Public Consultation (OPC) which took place from 31 March to 23 June 2023 (open for 12 weeks) with the aim to gather stakeholders’ views and experience on the EU’s EFIs for the 2014-2020 and 2021-2027 multiannual

(470) Namely Chad, Chile, Egypt, Honduras, Jordan, Kenya, Kosovo*, Madagascar, Moldova, Morocco, North Macedonia, Senegal, Serbia, Tajikistan, Türkiye, Ukraine.
financial frameworks in the context of the ongoing evaluation. It targeted all types of stakeholders, including citizens.

235 stakeholders responded to the questionnaire from 58 countries, including from 20 EU Member States (107 respondents representing 46 % of the answers).

The highest number of responses came from Moldova (32 answers; 14 % of the total), Türkiye (27 answers; 11 %), Belgium (23 answers; 10 %), France (21 answers; 9 %) and Germany (20 answers; 9 %). Figure 5 below shows the repartition of answers per country of origin selected by the participants.

Figure 5  
Distribution of responses by country

As for the type of stakeholders who replied, public authorities (including embassies and development agencies) constituted the largest share, with 95 respondents (40 % of the total). 69 respondents were from non-governmental organisations and 32 were citizens (18 from the EU and 14 non-EU). Among the 7 % of stakeholders who responded ‘Other’, 53 % were from UN agencies, 24 % from regional organisations, 12 % from international financial institutions and 12 % from other types of organisations.

Figure 6  
Distribution of responses by type of respondent

Also, 84 % of the respondents indicated that their institution, organisation, or company benefited from EU support or managed EU funded initiatives in the context of EU external cooperation over the past 2 years.

In-country stakeholder survey

The second survey deployed was an in-country stakeholder survey. The objective of this stakeholder survey, which took place from 19 July to 6 September 2023 (open for 7 weeks), was to gather the views and experience of Civil Society Organisations (CSOs) and National authorities in EU partner countries on the EU’s EFIs for the 2014-2020 and 2021-2027 multiannual financial frameworks in the context of their ongoing evaluation.
In total, 336 persons in the 17 sample countries \(^{(471)}\) were contacted to reply to the e-survey. This summary report on the results of the consultation provides an overview of the received responses.

92 stakeholders responded to the questionnaire from 16 countries \(^{(472)}\). The highest number of responses came from North Macedonia (14 answers, 15 % of the total) and Moldova (12 answers, 13 %). Figure 7 below shows the repartition of answers per country of operation selected by the respondents.

**Figure 7** Distribution of responses by country

As for the type of stakeholders who replied, CSOs constituted 55 %, with 51 respondents, whereas national authorities constituted for the remaining 45 %, with 41 respondents.

Of the 51 CSO respondents, 28 (55 %) indicated that their CSO was a national / local organisation, while 18 (35 %) respondents came from local representations of international CSOs.

More than 30 % of respondents have worked directly or indirectly with IPA II or IPA III (38 %) and EIDHR (35 %). Respondents were less experienced working with NIDIC-GE, DCI, EDF and ENI (this ratio is of course influenced by the overall distribution of countries), while they were least experienced with PI and IcSP. It is noticeable that for each instrument between 20 and 30 % of respondents did not know whether they actually worked with it.

**Figure 8** Work experience with EU external action instruments

**Validation survey to EU Delegations / Offices and HQ**

The third survey was the validation survey to EUDs / Offices and HQ. The objective of the EUDs / Offices and HQ survey, which took place from 11 August to 10 September 2023 (open for 4 weeks), was to validate and generalise some of the team’s emerging findings on the EU’s EFIs for the MFF 2014-2020 and MFF 2021-2027 in the context of their ongoing evaluation.

\(^{(471)}\) Chad, Egypt, Honduras, Jordan, Kenya, Kosovo*, Madagascar, Moldova, Morocco, Nepal, North Macedonia, Papua New Guinea, Senegal, Serbia, Somalia, Tajikistan, Türkiye.

\(^{(472)}\) No responses were received from Madagascar.
The survey targeted all EUDs/Offices and HQ staff who had been interviewed in the previous weeks and months. In total, around 240 persons were contacted to reply to the e-survey – 91 from EU HQ and around 130 from EUD/Offices. EUDs/Offices and HQ Units contacted were asked to provide at least one response per EUD/Office/Unit.

**Affiliation**

82 EU stakeholders responded to the questionnaire. Of the respondents, 19 (23 %) indicated that they come from EU HQ, while 63 (77 %) were from an EUD or Office.

The 63 respondents coming from EUDs belong to 60 different Delegations/Offices (473).

**Coverage of instruments**

Respondents were asked to specify the (geographic, thematic/other) EFIs used by their EUD/Office or HQ Unit.

Three instruments are used by the majority of respondents: NDICI-GE (77 %, 63), EIDHR (70 %, 57), and DCI (63 %, 52). EDF is used by half of respondents (50 %, 41). While two instruments are used by more than 25 % of the respondents: IcSP (35 %, 29), EFSD (33 %, 27). PI and ENI are used by around 1 in 8 respondents – 13 % and 12 % respectively. The last five instruments are used by less than 10 % of respondents, with only 2 % of respondents using GD and INSC.

(473) Only three EUDs contributed twice instead of once to the survey: Angola, Togo and Côte d'Ivoire.
Annex 4 – List of documents

General documentation

EU overarching policies

- Council of the EU, Concept for an Integrated Approach on Climate and Conflict, 2022.
- Council of the EU, Conclusions of the Council and of the Representatives of the Governments of the Member States, meeting within the Council, on the establishment of a Civilian CSDP Compact, 2018.
- EU, Council conclusions on EU Climate Diplomacy: accelerating the implementation of Glasgow outcomes, 6120 / 22, 2022.
- EU, Joint Communication on strengthening the EU’s contribution to rules-based multilateralism, JOIN(2021) 3, 2021.
- EU, The Treaty of the functioning of the EU (TFEU), 2012.
- EU, Common Position for the Fourth High Level Forum on Aid Effectiveness, 2011.
- EU, Communication on how to increase the impact of EU Development Policy: An Agenda for Change, 2011.
- EU, Conclusion of the council and the representatives of the governments of the member states on EU Code of Conduct on Complementarity and Division of Labour in Development Policy, 2007.
- European Council, The Union as a strong global actor, EUCO 79 / 14, 2014.
EU overall guidance


EU thematic policies and guidance

Conflict


Human Rights and Democracy

- EU, Council Conclusions on Democracy, 12836 / 19, 2019.

Environment and Climate Change


Food security and resilience

- EU, Because women matter, Designing interventions in food, nutrition and agriculture that allow women to change their lives, Guidance for DEVCO staff in the Delegations, 2019.
- EU, Closing the gender gap through agri-food value chain development, How EU development cooperation can help close the gender gap in value chain development, 2019.
• EU, Gender transformative approaches in a rural world, Tackling root causes of discrimination against rural women and girls, 2019.
• EU, Because results count: An Intervention Logic and Catalogue of Indicators for Food and Nutrition Security and Sustainable Agriculture, 2018.
• EU, Gender equality matters for food nutrition: How EU development cooperation can improve both gender equality and nutritional outcomes in the rural sector, 2018.
• EU, Women’s land rights matter: How EU development cooperation can help close the gender gap in land tenure, 2018.
• European Council, Council Conclusions on Strengthening global food and nutrition security, 2018.

EU budget
• EU, MFF 2021-2027 and Next Generation EU, Infographics, 2021.
• EU, BUDGETS DEFINITIVE ADOPTION (EU, Euratom) of the EU’s general budget for the financial year, 2014-2022.
• EU, SECTION III COMMISSION, Revenue Accruing From Persons Working With The Institution And Other Union Bodies, 2014-2022.
• EU, SECTION X EEAS, Contribution of the EU to the financing of the expenditure of the European External Action Service for the financial year, 2014-2022.

EU Strategic Evaluations (country, thematic, instruments)
• European Commission, Final evaluation of EU support to Human Rights Defenders mechanism, 2023.
• European Commission, Mid-term evaluation of the implementation of the EU Gender Action Plan III (2021-2025), 2023.
• European Commission, Evaluation of the EU support to Rule of Law and Anti-corruption in Partner Countries (2010-2021), 2022.
• European Commission, Evaluation of the EU cooperation with Georgia, 2022.
• European Commission, Evaluation of the EU’s support to climate action and environment in Enlargement and Neighbourhood regions, 2022.
• European Commission, Final sector evaluation of IcSP support to in-country civil society actors in conflict prevention, peacebuilding and crisis Preparedness, 2022.
• European Commission, Global Evaluation of the EU Engagement on Counter-Terrorism, 2022.
• European Commission, Evaluation of EU Budget Support and Blending in the Kyrgyz Republic (2010-2019), 2021.
• European Commission, Learning Lessons from the EUTF, 2021.
• European Commission, Mid-term Evaluation of the contribution to the implementation of SDGs by EU external action in the period 2016-2021, 2021.
• European Commission, Evaluation of the EU cooperation with Armenia, 2020


EU Internal reporting (overarching level)


• European Parliament, Draft Report on the implementation of the NDICI-GE, Committee on Foreign Affairs, Committee on Development, 2023 / 2029(INI), 2023.

NDICI-GE

EFI regulations & negotiations


• EU, Joint Communication To The European Parliament And The Council A renewed partnership with the countries of Africa, the Caribbean and the Pacific, JOIN(2016) 52, 2016.


NDICI-GE Other

- EU, Guidelines for the programming of the NDICI-GE (2021-2027), 2020.

IPA III

EFI regulations & negotiations


EFSD(+) regulations & negotiations


EFSD(+) Other

INSC
EFI regulations & negotiations

DOAG
EFI regulations & negotiations
- EU, COUNCIL DECISION (EU) 2021 / 1764 of 5 October 2021 on the association of the Overseas Countries and Territories with the EU including relations between the EU on the one hand, and Greenland and the Kingdom of Denmark on the other (Decision on the Overseas Association, including Greenland), 2021.
- EU, COUNCIL DECISION 2014 / 137 / EU of 14 March 2014 on relations between the EU on the one hand, and Greenland and the Kingdom of Denmark on the other, 2014.

Studies onEFIs (incl. think thank papers)
- Bossuyt, J., Local Authorities in EU external action after 2020: Strategic actors or distant voices?, 2020.
- Di Ciommo, M. and Sayós Monràs, M., Sailing new waters in international cooperation, On the way to framing future EU engagement with more advanced developing countries, Discussion paper 244, ECDPM, 2018.
• ECDPM, *Gender equality in EU external action, Mainstreaming women’s economic empowerment*, 2023.
• ECDPM, *Catching up with Global Europe: 15 questions on the EU’s new financial instrument answered*, 2021.
• EURACTIV, *Rama: Open Balkan fulfilled its mission, time to focus on Berlin Process*, 2023.
• EURACTIV, *As EU seeks to rival China’s infrastructure offer, Africans are sceptical*, 2021.
• Lundsgaarde E., et al., *New EFSD+ and the EIB’s External Lending Mandate*, a Study commissioned by the European Parliament (BUDG committee), 2022.


Closing space – democracy and human rights support under fire, Carnegie endowment for international peace, 2014.


Council of the EU, Update on state of play of external cooperation in the field of migration policy, 2023.


EEAS, EEAS / Commission services’ issues paper suggesting parameters for a concept on Stabilisation as part of the EU Integrated Approach to external conflicts and crises, EEAS(2017)1554, 2017.


EU, EU support to the African Union Mission in Somalia: Council approves further support under the European Peace Facility, Council of the EU, Press release, 6 July 2022.


EU, Middle-income countries: Council affirms the EU’s commitment to establishing tailored partnerships, Council of the EU, Press release, 14 June 2021.


• EU, EU and 79 African, Caribbean and Pacific countries join forces for ambitious global climate deal, Directorate-General for Climate Action, 8 December 2015.


• EUD Kenya, Global Gateway: First section of modernised 560km highway along the strategic Northern Corridor, inaugurated in Kenya, will boost trade in East Africa, Press and information team of the EUD to KENYA, Mombasa, 2022.


• European Commission, Global Gateway: EU launches Digital Economy Package for Kenya to boost connectivity, skills and inclusive governance, DG INTPA, News announcement, 5 October 2023.

• European Commission, Sub-Delegated Authorising Officer Report to the Directorate-General, 2023.


• European Commission, Staff Working Document – Analytical Report following the Communication from the Commission to the European Parliament, the European Council and the Council Commission Opinion on Ukraine’s application for membership of the EU, SWD(2023) 30, 01 February 2023.


• European Commission, Launching the Global Europe Performance Monitoring System containing a Revised Global Europe Results Framework – SWD(2022) 22 final, 2022.


• European Commission, Ex post evaluation of the activities of the JRC under Horizon 2020 and Euratom 2014-2020, 2022.


• European Court of Auditors, Annual report on the performance of the EU budget – status at the end of 2021, 2022.

• European Parliament Think Tank, EU strategic autonomy 2013-2023: From concept to capacity, 2022.


• Nasser Hadian (speaker), *Spotlight on Iran, Mediterranean Dialogue*, ISPI (Italian Institute for International Political Studies), 1 March 2023.
• The World Bank, *Beyond the Gap: How Countries Can Afford the Infrastructure They Need while Protecting the Planet*, 2019.

**Block-specific documentation**

For each block the Team has consulted programming and strategic documents at country, regional and thematic level such as country and regional Multiannual Indicative Programmes (MIPs), Single Support Frameworks (SSF) and programmes at thematic level (AAPs) as well as country-level EAMRs, progress reports and various studies. Examples for block-specific documents include:


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• Barlett, W., et al., *The Economic and Investment Plan for the Western Balkans: assessing the possible economic, social and environmental impact of the proposed Flagship projects*, study requested by the AFET Committee, European Parliament, 2022.
• EEAS, *Progress Report about the implementation of the EU concept for Integrated Approach on climate and conflict, 2022.*
• EEAS, *Guidance Note on drafting a Political Framework for Crisis Approach (PFCA), 2016.*
• EU, *Mid-term Evaluation: the third phase of the Participatory Slum Upgrading Programme (PSUP III), 2023.*
• EU-ABC, *EU-ASEAN Business Sentiment Survey, 2023.*
• European Court of Auditors, *Special report EU support for the rule of law in the Western Balkans: despite efforts, fundamental problems persist, 2022.*
• European Commission, *Study on progress in regional policy of the WB6 and Turkey, 2022.*
• European Commission, *NDICI-GE thematic programme on Global Challenges – Concept note for pre-programming, 2020.*
• FPI, *Strategic Plan (2020-2024), 2020.*
• Leaders of the EU and its Member States, *Brdo Declaration 6 October 2021, 2021.*
• Southern African Development Community (SADC), *Joint Conclusions from the Fourth Meeting of the High Level Group of the 11th EDF Regional Indicative Programme for the Eastern Africa, Southern Africa and Indian Ocean Region, 2016.*
• UNODC, *Final in-depth evaluation Strengthening the Administration of Justice and Operationalizing Alternatives to Imprisonment in Kenya, 2023.*
Annex 5 – Results from the eSurveys and OPC

Disclaimer: the views presented in these summary reports are not the views of the European Commission but of the stakeholders that participated in the e-surveys. It cannot under any circumstances be regarded as the official position of the Commission or its services.

EFIs are the main funding source for supporting the EU’s action on the global scene in the framework of EU development and external cooperation, Neighbourhood and Enlargement policies that form part of the EU’s external action, as defined in the Treaties.

Synthesis report – OPC online survey


Objectives of the consultation
The objective of the public consultation, which took place from 31 March to 23 June 2023 (open for 12 weeks), was to gather stakeholders’ views and experience on the EU’s EFIs for the MFFs 2014-2020 and 2021-2027 in the context of their ongoing evaluation. This summary report on the results of the consultation provides an overview of the received contributions.

The open public consultation targeted all types of stakeholders, including citizens (see Annex 3 above for an overview of the respondents). The questionnaire was divided into two parts: the first and more general part was intended for the general public and the second and more technical ‘expert’ part was aimed at stakeholders with specific knowledge of EU external cooperation (e.g., development agencies, non-governmental organisations and public authorities). This public consultation questionnaire consisted of 8 general questions and 14 expert questions. The questions were available in five languages (English, French, German, Portuguese and Spanish) and replies could be provided in any of the 24 official EU languages. Respondents could also upload a document if they wished to develop their replies in detail.

Main responses

General questions
This first set of seven questions was intended for the general public, and respondents were able to give their assessment using the following scaling answers: Not at all; Not really; Neutral; Very; Totally; I don’t know. The ‘I don’t know’ answers (6% of total responses on average) were excluded to allow for better visualisation of the respondents’ perceptions. The average number of responses (excluding ‘I don’t know’ answers) for the general questions was 215.

Question 1 Has the EU enhanced its partnerships with partner countries thanks to its external cooperation over the last two years?

While overall a small majority of respondents (55%) agreed that the EU enhanced its partnerships with partner countries, this positive outlook is not uniformly shared by all respondent groups. NGOs that responded to the questionnaire expressed more sceptical views (22% in this group believe that EU has not really or not at all been able to enhance partnerships). In contrast, public authorities in their responses reported the most positive views on this question with 62% believing that the EU has succeeded in enhancing partnerships through its external cooperation.
Question 2  Have the EU external cooperation instruments been flexible in responding to new challenges and crisis situations in partner countries?

With regards to **flexibility** of the EU external cooperation instruments in responding to new challenges and crisis situations in partner countries, NGOs that responded to the questionnaire are less positive in their assessment than public authorities that participated in the consultation (31% versus 53% of positive answers). The difference is even more striking when comparing EU citizens (29% of positive answers) and non-EU citizens (64% of positive answers) that reacted to the consultation.

Question 3  Is the EU contributing through its external cooperation to the promotion and implementation of EU values, priorities and interests worldwide?

Regarding the contribution to **EU values, priorities and interests worldwide**, a majority of participants replied positively across all stakeholder groups. The agreement is highest among public authority participants (with 79% positive answers) and lowest among the group of EU citizens that responded to the questionnaire (with 50% positive answers and 17% who replied ‘not at all’).

Question 4  Has it become easier in the past two years to access EU funds for external cooperation?

Regarding **access to EU funds**, 49% of respondents did not agree that it had become easier in the past two years, compared to only 19% of positive views. Negative views are most frequent among NGO respondents (62%) and company/business respondents, while public authority participants provide a slightly more positive outlook (32% negative views).

Question 5  In their external cooperation, have the EU and EU Member States worked more as a team over the last two years?

N = 216
Respondents tend to agree that **EU and EU Member States** worked more as a team in their external cooperation over the last two years. Public authority participants provided a more positive assessment (52 %) compared to NGO respondents (22 % positive answers).

**Question 6**  
**Does the EU’s external cooperation contribute to positive and sustainable changes in partner countries?**

![Bar Chart](https://via.placeholder.com/150)

A large majority of respondents (72 %) rated the contribution of EU’s external cooperation to **positive and sustainable changes** in partner countries as positive. While all of the non-EU citizen participants answered positively, only 44 % of EU citizens and 54 % of company / business respondents provided a positive assessment.

**Question 7**  
**Has the EU’s external cooperation become more visible in the past two years?**

![Bar Chart](https://via.placeholder.com/150)

Finally, participants assessed the **visibility of EU’s external cooperation** positively with 50 % of positive answers against 23 % of negative replies. There is a stark difference between public authority participants (56 % positive replies) and NGO respondents (only 29 % positive replies). Negative views on the question are most prominent amongst company / business respondents (45 % negative answers).

**Expert questions**

The following fourteen questions were intended for respondents that have specific knowledge of EU external cooperation. Participants were able to give their assessment using the same scaling answers as for the general questions. The ‘I don’t know’ answers were excluded to allow for better visualisation of the respondents’ perceptions. Since the questions are more specific, the rate of ‘don’t know’ answers varies between 7 % and 76 %, averaging at 38 % across all questions (which corresponds to an average of 129 answers per question).

**Question 8**  
**Has the EU improved its capacity to respond to global challenges in partner countries?**

![Bar Chart](https://via.placeholder.com/150)

In response to the question regarding the EU's improved capacity to address **global challenges** in partner countries, 51 % of respondents answered positively and 19 % negatively. Public authorities are overall more positive (57 % positive replies) than NGOs (30 % positive replies). Negative views on the question are most prominent amongst company / business respondents (40 % ‘not really’ answers for 30 % of ‘very’ answers).
**Question 9**  Is the EU’s external cooperation adequately contributing to the Sustainable Development Goals of the 2030 Agenda and to the implementation of the Paris Agreement on climate change?

N = 196

Regarding the EU’s external cooperation and its adequate contribution to the **Sustainable Development Goals** of the 2030 Agenda and the implementation of the **Paris Agreement on climate change**, the overall assessment is positive (13 % replied ‘totally’ and 44 % replied ‘very’). The assessment is much more positive for public authorities (67 % positive answers) than for NGOs (34 % positive answers), and for non-EU citizens (100 % positive answers) than EU citizens (50 % negative against 43 % positive answers).

**Question 10**  Has the replacement of previously separate instruments with a broad instrument (NDICI-Global Europe) brought a positive change in the EU’s external cooperation?

N = 163

Concerning the replacement of previously separate instruments with the **broad instrument** (NDICI-Global Europe) and its impact on the EU’s external cooperation, 10 % of respondents replied that it ‘totally’ [brought positive change], 27 % replied ‘very’, 38 % replied ‘neutral’, 21 % replied ‘not really’, and 4 % replied ‘not at all.’ While public authorities gave a more positive assessment (43 %), NGOs appear to be split on the matter (33 % positive and 36 % negative answers). EU citizens gave more negative than positive answers (36 % against 21 %) and company / business respondents gave no positive answers (80 % negative, the rest neutral).

**Question 11**  Has the consolidation of different geographic regions into one broad instrument (NDICI-Global Europe) facilitated cooperation across regions?

N = 152

Regarding the consolidation of different geographic regions into the **broad instrument** (NDICI-Global Europe) and its facilitation of cooperation across regions, 6 % of respondents replied that it ‘totally’ [facilitated cooperation], 20 % replied ‘very’, 36 % replied ‘neutral’, 31 % replied ‘not really’, and 7 % replied ‘not at all.’ EU citizens and public authorities are respectively split between positive and negative answers (36 % for EU citizens and around 30 % for public authorities). Company / business respondents are mostly negative (57 %, the rest neutral) and non-EU citizens mostly positive (50 %).
Question 12  Have the thematic dimensions been adequately addressed in geographic programmes?

N = 175

As for adequately ‘addressing the thematic dimensions in geographic programmes’, responses were overall more positive (40 %) than negative (28 %). The categories of respondents whose answers were more positive than negative were public authority, company / business, non-EU citizen, and academic / research institution. Both environmental and ‘other’ respondents were split evenly between positive and negative answers, while NGOs and EU citizens were more negative in their assessments.

Question 13  Is the set of targets under NDICI-Global Europe an efficient way to attain the Instrument’s policy objectives?

N = 155

Regarding the efficiency of the set of targets under NDICI-Global Europe in achieving the Instrument’s policy objectives, the respondents’ answers were 43 % positive, 40 % replied ‘neutral’, and 17 % negative. EU citizens were the most negative (45 % negative against 18 % positive answers), while all other categories of respondents contained more positive than negative answers.

Question 14  Has the EU improved its capacity to attract and support investment in partner countries, including from the private sector?

N = 153

In terms of the EU’s capacity to attract and support investment in partner countries, including from the private sector, 36 % of respondents replied positively, 32 % replied ‘neutral’, and 32 % negatively. While public authorities gave a 41 % positive assessment, both NGOs and non-EU citizens were evenly split between positive and negative answers (respectively 29 % and 38 %). Both company / business and EU citizens gave an overall negative feedback (87 % and 54 % respectively).

Question 15  Has the incentive-based approach contributed to the promotion of policy objectives and priorities in the EU’s neighbouring countries?

N = 134
When asked about the contribution of the incentive-based approach to promoting policy objectives and priorities in the EU's neighbouring countries, 37 % of respondents replied positively, 39 % replied 'neutral', 24 % negatively. Public authorities, non-EU citizens, academic / research institution and ‘other’ respondents were overall more positive than negative, while it was the opposite for NGOs, company / business, EU citizen, and environmental organisation respondents.

**Question 16** Under the IPA III instrument, has the change from geographic to thematic programming improved the EU support to IPA III beneficiaries on their accession path?

![Bar chart showing responses to Question 16]

N = 105

To the question 'under the IPA III instrument, has the change from geographic to thematic programming improved the EU support to IPA III beneficiaries on their accession path', 4 % of respondents replied 'totally', 40 % replied 'very', 42 % replied 'neutral', 8 % replied 'not really' and finally 6 % replied 'not at all.' All respondent categories were mostly positive, the highest share of negative answers for citizens (EU and non-EU, around 23 %), followed by public authorities (17 %) and company / business (14 %).

**Question 17** Is IPA III assistance strengthening IPA III beneficiaries' capacity with regard to the rule of law and fundamental rights; economic governance; democratic institutions; public administration reform; and their ability to meet the membership criteria?

![Bar chart showing responses to Question 17]

N = 101

In terms of whether IPA III assistance is strengthening IPA III beneficiaries' capacity in areas such as the rule of law and fundamental rights, economic governance, democratic institutions, public administration reform, and their ability to meet membership criteria, 6 % of respondents replied 'totally', 51 % replied 'very', 32 % replied 'neutral', 9 % replied 'not really' and finally 2 % replied 'not at all.' The highest number of negative answers come from public authorities (11 % negative against 63 % positive answers), and citizens (23 % negative against 35 % positive answers on average).

**Question 18** Do EU Election Observation Missions contribute to improving the reliability of electoral processes in partner countries?

![Bar chart showing responses to Question 18]

N = 111

Regarding the contribution of EU Election Observation Missions to improving the reliability of electoral processes in partner countries, respondents were mostly positive (53 %), 33 % replied 'neutral', and 14 % gave a negative answer. No respondent category gave an overall negative assessment, but EU citizens (30 %), public authorities (11 %) and NGOs (11 %) recorded the highest number of negative answers.
Question 19  Does the new Decision on the Overseas Association including Greenland (DOAG) improve the EU’s capacity to respond to the specific challenges of the Overseas Countries and Territories (OCTs)?

When asked about the new Decision on the Overseas Association including Greenland (DOAG) and its impact on the EU’s capacity to address the specific challenges of the Overseas Countries and Territories, 2% of respondents replied that it ‘totally’ [improved], 19% replied ‘very’, 74% replied ‘neutral’, 2% replied ‘not really’ and finally 3% replied ‘not at all.’ Due to the lower number of respondents, the disaggregation by groups is not statistically meaningful.

Question 20  Are the former Greenland Decision and the new DOAG helping the EU to play a more influential role in the Arctic region?

To the question ‘are the former Greenland Decision and the new DOAG helping the EU to play a more influential role in the Arctic region’, 2% of respondents replied ‘totally’, 21% replied ‘very’, 69% replied ‘neutral’, 2% replied ‘not really’ and finally 6% replied ‘not at all.’ Due to the lower number of respondents, the disaggregation by groups is not statistically meaningful.

Question 21  Has EU support through the European Instrument for International Nuclear Safety Cooperation (INSC) strengthened the partner countries’ nuclear safety and safeguard capacities?

Finally, the last question was ‘has EU support through the European Instrument for International Nuclear Safety Cooperation (INSC) strengthened the partner countries’ nuclear safety and safeguard capacities.’ 8% of respondents replied ‘totally’, 22% replied ‘very’, 59% replied ‘neutral’, 6% replied ‘not really’ and finally 5% replied ‘not at all.’ Due to the lower number of respondents, the disaggregation by groups is not statistically meaningful.

Qualitative comments

Respondents were given the possibility to provide qualitative inputs at the end of the questionnaire. 75 comments were received. In addition, 43 participants chose to also upload further explanatory documents (either explanations on answers given or pre-existing documents such as position papers or reports). Recurring topics of both qualitative inputs are synthesised in the following paragraphs.
In the 8 contributions from the **EU citizens** and 1 from **non-EU citizens** the main concern was the allocation of sufficient financial resources. No further explanatory documents were uploaded by these stakeholder groups.

Similarly, **non-governmental organisation** respondents (32 contributions) stressed the contradiction between the recognised importance CSOs & NGOs and the related programming and funding under NDICI-GE, as there is a perceived erosion in funding opportunities, and limited transparency in funding allocation. They also stressed the importance of decentralised cooperation and advocated for greater recognition of local and regional governments. A total of 24 additional documents were uploaded by NGO respondents. The most recurring theme was the perception of reduced and more difficult engagement options for civil society with EU cooperation in partner countries, in addition to more specific issues emerging from the respondents’ core areas of activity (e.g., energy, human rights).

The participants from **public authorities** (19 contributions) reported facing challenges in implementation and programming (slow, complicated, and non-transparent), perceived neglect of Local Authorities, reduced involvement and coordination with partner countries and lack of dedicated resources to support decentralisation, governance, and local development. They mentioned that the focus on Global Gateway actions has diverted the EU’s external cooperation away from its primary target of supporting poverty reduction and addressing SDGs. Public authority participants uploaded 10 additional documents, most of which were provided by EU Member States representatives. The topics covered are diverse, ranging from observations on key shifts and features of the new financing instruments (e.g., simplification, Geographisation principle or Global Gateway) to requests for a greater emphasis on geopolitical challenges (such as Russia’s war of aggression against Ukraine).

**Other contributors** such as UN agencies, regional organisations and international financial institutions (15 contributions) also raise similar concerns: challenges in decision-making and programming, neglect of local government associations and limited understanding of local government and contexts. They however perceive the ‘Team Europe’ approach as a powerful means of translating the principles of the Paris Agreement on climate change and the EU Code of Conduct on the Division of Labour into practice. In addition to these comments, 9 documents were uploaded by this stakeholder group, which contained additional views on topics related to the participants’ line of work – on EU migration policy, mainstreaming of human rights and democracy in EU external action and the use of guarantees and blending, among others.

**Summary analysis of uploaded document material**

**Cushion**
- The cushion is seen as an important tool providing flexibility but there are widespread concerns about its rapid depletion due to unforeseen events in the first two years of the current MFF.
- There is also continued concern over the fact that the cushion has already been earmarked and used well into the future, leaving little to no margin of manoeuvre for the remainder of the MFF until 2027.
- Some voices state that the cushion has been underfunded to begin with and criticise that its volume was further reduced in order to mitigate budgetary shortcomings at other levels (in relation to the top-ups for NDICI-GE thematic programmes, e.g., Global Challenges, and in relation to the Syrian refugee crisis).
- Ukraine is highlighted as a case in point showing the necessity and correct use of the cushion. A more targeted use of the cushion for such unforeseen events would be preferable to many respondents, as opposed to diverging the use of the cushion to foreseeable and plannable priorities.
- The lack of transparency and strategic discussions regarding the use of the cushion with the Council has been noted by some respondents.

**Budgetisation of EDF**
- The budgetisation of EDF is highlighted by some respondents as a welcome element of administrative simplification.
- Yet, its effects (particularly in terms of flexibility), mostly remain unseen – possibly due to the fact that actions previously programmed under the 11th EDF are still ongoing.
- There are concerns that this might lead to a less tailored and oversimplified cooperation.
- There are voices criticising that the budgetisation of EDF has not been adequately compensated by an increase to the heading 6 ceiling and to the NDICI-GE budget.

**Rapid Response Pillar (RRP)**
- Respondents highlighted the importance of the Rapid Response Pillar (RRP) in particular for its linkage of crisis response and building resilience (effectively linking humanitarian and development cooperation). It was described as a flexible tool allowing a swift response to crises and in particular
the possibility to shift funds across regions and between aid modalities was seen as contributing positively to the overall flexibility of EU support.

- In that context, the resilience component was seen as key to maintain a strong Humanitarian-Development-Peace nexus, considering the ever-increasing need for support in fragile contexts. This should have the priority over mainstreaming resilience in the MIPs through the geographic pillar. When solutions are complex, a nexus approach is needed.

- Respondents further highlighted the importance of ensuring a functioning ‘transfer’ from short-term to long-term funding instruments. They identify an unmet need when it comes to bridging short-term rapid response actions with long-term actions. In theory, the current instruments enable this transition but it hasn’t been put to practice. In the previous MFF, trust funds provided an easy way for flexible follow-on funding. The current MFF lacks such a bridging element between short-term and long-term budget lines.

- There are concerns over the fact that the funding of the resilience component has been used to fund the Syrian refugee packages with Türkiye and the Middle East, effectively reducing EU’s capacity to react to other (less mediatised) crises.

- There is a need for greater transparency in RRP management. There should be more regular and more informative (e.g., regarding strategic orientations and use of RRP) ex ante discussions with the Council. DG ECHO should be consulted to ensure coherence. CSOs should be considered primary implementing partners as well as beneficiaries of RRP actions.

**Flexibility**

- In their responses, OPC participants see and welcome (increased or at least continued) flexibility through a variety of tools and processes:
  - EDF features such as multi-annuality of budgets, budget shifts across regions and between modalities have carried over.
  - In theory, NDICI-GE offers a lot of flexibility with specific envelopes, even though in practical terms the flexibility is not being sufficiently applied by all services.
  - Defining priorities with IPA partner countries on the basis of the Programming Framework and Strategic Responses rather than MIPs contributes to greater flexibility in terms of strengthening the policy-driven approach and efficiency of the EU support, while building horizontal partnerships.
  - Flexibility in general has improved, but sometimes at the cost of an excessively unidirectional vision from the EU, due to the difficulty of bringing together positions in order to reach consensus positions.

- Some respondents also note areas and elements through which EU support has lost flexibility:
  - Trust funds enabled EU to be more reactive to changing contexts and provided the possibility to proactively propose projects out of country and regional frameworks. While in the previous MFF, the Trust Funds fulfilled the role of flexible follow-on funding, NDICI-GE has so far fallen short in terms of ensuring links between budget lines that fund short term pilots and those that fund longer term programming.
  - More prominent role of joint programming allowed a more flexible co-creation approach. Working better agenda seems to have diluted under the Team Europe approach (paradoxically).
  - Flexibility in response to crises has fallen short due to insufficient funding (see cushion and RRP).

- The following recommendations with regards to flexibility were highlighted by respondents:
  - More flexible planning and implementation processes are needed, which will require a rethinking of the Regulation.
  - Regarding flexibility in relation to Team Europe, it will be key to keep the exercise informal and flexible, while ensuring that it lives up to the joint programming standards of partners’ ownership and real joint analysis and design. Otherwise, there is a risk the development effectiveness agenda becomes undermined by over-simplification.

**Team Europe**

**Positive remarks**

- It is recognised that TE has made some progress to improve the coordination between the EU institutions and EU Member States. Thanks to Team Europe, partner countries are increasingly coming to recognize the EU as a single global actor. One respondent argues that Team Europe
collaborative approach has become particularly visible in the African Union and the EU's D4D Hub project.

- Visibility has increased, however it has to be matched by deliverables. One voice highlights that the new paradigm of Team Europe with its cooperative, co-creative approach has brought about needs for additional resources in coordination among actors. Another respondent points out that TEIs have also brought more coherence between the member state and EU funding at national level.

In relation to joint programming

- Enhanced joint programming paves the way for enhanced joint implementation as also being the preferred approach by NDICI-GE, whenever appropriate, and thereby advances the Team Europe approach. Joint working is being promoted foremost and strongly by concrete TEI, but less so by stipulations from NDICI-GE in comparison to its predecessor instruments. Nevertheless, with the preference for joint programming as approach at country level, NDICI-GE represents an improved framework.

- According to some respondents, a negative impact of TE is that we are going backwards in terms of joint implementation. Joint implementation requires joint teams and much more than joint intervention logics and parallel approaches under a single contract (multi-partner contribution agreement). One respondent highlights how, in previous financing instruments (2014-2020), joint programming had a more prominent role, contributing to a more flexible co-creation approach in line with the Working Better Together agenda. Team Europe approach has brought dynamism and renewed momentum, but risks undermining the standards of joint programming regarding partners’ ownership and comprehensive joint analysis and design. Sometimes, TEIs have become an alternative to (rather than a lever for) joint programming and implementation.

Criticisms and considerations

- The main criticism to the TE approach is the lack of transparency and the lack of ownership of partner countries in the design and implementation of Global Gateway projects and Team Europe initiatives (TEIs). The design and elaboration of TEIs have mostly been an EU-driven process. One voice highlights how engagement by implementation agencies of Member States should promote ownership by local actors.

- Another widespread consideration is that constant changes in the communication approach and a proliferation of unclear concepts has made it more difficult both for Team Europe actors and for partner countries to understand and integrate the new narratives.

- Many respondents raise several critical points about TE and TEI: 1) There is lack of clarity of roles of the different actors and lack of harmonisation of coordination mechanisms and governance structures across TEI. 2) Lack of access to data on Team Europe Initiatives, with the EU’s own TEI and Joint Programming tracker only availing superficial information. 3) Lack of inclusion of CSOs and Local Authorities in the conceptualisation and governance of TEIs. 4) Lack of transparency regarding the funding sources of TEIs (including TEIs branded as Global Gateway projects) which does not ensure accountability of the different actors involved, including development finance institutions.

- Some respondents point out that there is the impression that GG projects and TEIs are just a rebranding exercise and do not bring any additional funding to the table. This ‘rebranding exercise’ of EU international cooperation seems to also take away funds from the previously programmed initiatives to the large infrastructure programmes that offer more visibility.

- One respondent warns that a negative impact of TE is that we are going backwards in terms of joint implementation. One respondent claims that the role of Member States is not as clear as it was with regards to the programming, selection and approving of these elements beforehand. To counter this trend it is important to 1) Ensure inclusiveness in the participation in TEI, which requires reviewing the need for co-financing (or for having in place bilaterally funded actions) to be part of TEIs. 2) Broader and more creative and flexible criteria must be developed to reflect the commitment of EU Member States and their public administrations to implement actions already funded by EU taxpayers. If not, considering TEIs make up for two-third of NDICI-GE funding, they risk becoming tools for bigger EU Member States to leverage funds for their specific priorities, undermining complementarities.

Recommendations

- One main recommendation is to ensure that partner countries take ownership of the TEI process and that local actors, including CSOs, take an active role in implementation.

- Many respondents recommend that the EC needs to resolve the coordination, monitoring and governance of the TEIs and ensure transparent access to TEI information.

- According to one respondent, a smooth transition from programming into implementation (ensuring a true joint implementation of EU-funded projects) and improving the work on Team Europe narratives is key to avoid fragmentation in perceptions of the EU.
According to one voice, EUDs should play a more prominent role leading structured coordination spaces. Moreover, they highlight the need for more structured, specific procedures for information flows and more clear channels for participation.

More efforts should be directed towards communication of EU external actions. According to one respondent, the visibility of the European Union as the largest collective donor of development aid has improved. However, in many partner countries, it may still be unclear what aid has been provided by the EU and what has been provided by Member States, as well as what Team Europe approach and Global Gateway initiatives are specifically.

One voice recommends, that, as per the Youth Action Plan (YAP) in EU external action 2022-2027, Team Europe, including the European Commission via NDICI, should ensure there is funding for youth-inclusive and youth-led peacebuilding, and this funding should be accessible for grassroots organisations.

According to one respondent, it is necessary to ensure that all NDICI-GE programming, Team Europe initiatives and joint programmes are based on an intersectional analysis, and that a twin-track approach (which combines disability mainstreaming with targeted initiatives) is used.

**Geographisation principle**

**Positive Remarks**

- Some respondents welcome the Geographisation principle, as it could give the possibility for more ownership of partner countries but argue that it was to some extent overshadowed by the Policy first approach which pushed EU interest to the forefront.
- According to one respondent, the Geographisation principle has improved the negotiation, formulation, and execution of new ‘national or bilateral’ projects. Direct contact with the EUD has led to an improvement in the quality of these projects.

**Criticisms and recommendations**

- The Geographisation principle raised some concerns about the decreased funding going to thematic programmes. However, one respondent argues that thematic spending / action targets set by the NDICI-GE Regulation on gender, climate, human development and social protection, human rights, democracy and good governance now play an important role in balancing this out. Another voice highlights the importance of democracy appearing high in the list of geographical priorities. One respondent is very critical of the allocation of a much larger proportion of funds via geographical programmes. According to them, development aid is now considered a tool to leverage partner countries’ cooperation on matters linked to EU interests, such as security and migration. The EU has lost sight of aid’s original purpose: addressing the root causes of poverty.
- Many respondents are concerned that the Geographisation principle undermines the EU’s capacity to respond to global challenges, which are better addressed through regional / transregional actions. There is a need to balance the imperatives of the Geographisation principle and national ownership with core and flexible funding. Respondents highlight how the Geographisation principle: 1) limits the funds for global level initiatives, with a potential impact on the EU’s influence in multilateral fora; 2) limits the funding of projects at regional level, making it dependent on the existence of units with regional budget lines; 3) it limits the funds (and will) for transregional actions.
- According to one respondent, there is a perception of a narrow administrative approach to Geographisation which risks undermining support to regional integration as a distinctive element of the EU and its external projection. Regional and national actions have a mutually beneficial relationship that must be actively promoted.
- Moreover, the Geographisation principle may have also contributed to CSOs limited access to EU funding as they are considered solely as implementing partners under thematic programmes which have smaller budget allocations.
- With the shift towards Geographisation, greater emphasis is now placed on bilateral cooperation at the country / regional level and on aligning development programmes with priorities of partner countries / regions. One respondent highlights the need to involve in the consultation with partner countries on priorities, not only the central government, but wider society, including civil society, private sector actors and Local Authorities. In this respect, policy dialogues between EUDs and partner country / region actors are key to enhancing the EU’s partnership with partner countries, and to delivering on NDICI-GE’s Geographisation principle. However, policy dialogues are not as advanced in all parts of the world. One voice recommends that EUDs pursue these actively and comprehensively.

**Policy first approach**

- The Policy first approach is especially welcomed by some respondents. A coordinated Policy first approach is seen as needed to answer to global challenges, reinforcing the strategic dimension of...
NDICI-GE and the focus on political priorities as a guide for EU external action. In line with the Policy first approach, NDICI-GE should be steered in a way to adequately respond to more pressing challenges. The Policy first approach also needs to be extended from programming and into implementation, through the facilitation / promotion of permanent policy dialogue mechanisms.

- According to respondents, it is difficult to assess whether the current MFF is policy-driven. For some, the targets contribute to making NDICI-GE a policy-driven instrument. The new IPA III programming process is also strengthening the Policy first approach while building horizontal partnerships. Others highlight the need to clarify the concept more strategically, ensure proper operationalisation, and reinforce the partnership approach (focus not only on EU priorities but shared priorities with partner countries).

- There are voices highlighting the need to put SDGs at the core of the Policy first approach, reflecting the concern by some respondents of the risk of dominance of EU interests over interests of partner countries. Although the EU has tried to build horizontal partnerships and ensure ownership, there is a perception by some partner countries that there is no balance when setting cooperation priorities, which end up aligning mostly with EU geopolitical priorities. The impression of a 'EU-only Policy first' approach is widespread among participants. Team Europe and Global Gateway in particular are seen as contributing to a top-down approach with less involvement of the partner countries and regional entities. In this context, there is currently little transparency on how the EU takes forward the concept of equal partnership and involves partner countries in decision-making, rather than setting its own priorities and interests first.

- One particular challenge is to ensure 'policy-driven investments' in the Global Gateway investment agenda, embedding investments in shared priorities and orienting them towards development results. This could be supported by broader technical cooperation facilities in order to nurture policy dialogue processes, contribute to set in place the institutional, policy and regulatory frameworks required for the successful kick-off and implementation of multiple PIPs (across sectors or countries), in line with the Policy first approach.

**Global actor (and related issues – EQ4)**

- Some respondents welcome the promotion of a more global and geopolitical approach. In this context, the recent blending activities and upcoming guarantee activities combined with a more concrete communication on Global Gateway flagships are identified as a step forward to better demonstrate EU / Team Europe's impacts in line with local needs. According to one respondent, thanks to Team Europe, partner countries more and more perceive the EU as a whole global actor and less as a sum of its Member States.

- One respondent acknowledges the EU's increasing attention for democratic principles and governance and its external action to defend and promote democracy across the world. It is argued that the EU's footprint as a global leader on democracy could be further strengthened through a more effective application of its EFIs to advance democracy (e.g., by allocating at least 20 % of the budget for geographic programmes to democratic governance and human rights, allowing it to play a central role in development and complement the thematic programmes where democratic space is available). One respondent highlights how the EU is an important actor in promoting peace and security. In this context, FPI is a key efficient and flexible mechanism that can provide support to areas affected by crisis and conflict. Coordination needs to be ensured between FPI and other EU actors in implementing NDICI-GE.

- There is concern among respondents about the lack of a clear development mandate for the Global Gateway. They describe a risk of prioritising countries with strategic geopolitical interest, leaving behind the most vulnerable regions and losing the focus on SDGs. In this context, respondents highlighted a perception by some partner countries that cooperation priorities are unbalanced, which end up aligning only with EU geopolitical priorities. Some respondents are concerned about the risk of redirection of NDICI-GE funds that have been already programmed in the country / regional / thematic MIPs during the MTR process of NDICI-GE to achieve commercial competitiveness and geopolitical objectives. Moreover, they are concerned over the lack of transparency and public scrutiny of the instrument.

- One respondent highlights the growing gap between EU’s ambitions on the global stage and the resources available to achieve them. Many of the EU’s financing tools and flexibility instruments are almost fully committed. The level of funds in the MFF is not enough. This is shared by others who see a need to adapt the long-term budget to protect the EU’s positive impact, influence and credibility on the global stage. Several reasons are the EU’s purchasing power reduced due to inflation, funding for key thematic programmes emptied due to COVID-19, and overall funds reduced due to the frontloading of resources in 2021 and 2022.
Another voice suggests the adoption of a private sector engagement strategy helps foster inclusiveness in EU external action (leveraging a pool of 27 public policy models in the EU) and to achieve a more geopolitical development cooperation (embedding actions in shared policy priorities identified through policy dialogues, which then nurture EU political dialogues). However, it is recognised the risk again that geopolitical interests take over development priorities.

**EU values and interests**

- Respondents highlighted a contradiction between the promotion of EU interests and pursuit of strategic autonomy, and EU values. There is concern about the dynamics between partner countries and the EU, and policy coherence for sustainable development, in particular the risks of extractivism of partner countries' resources for the EU's own strategic autonomy and growth. One example is the concept of equal partnerships. There is not enough transparency in how the EU involves partner countries in decision-making, rather than setting its own priorities and interests first. In that context, specific needs of partners should be taken into account more thoroughly in a collaborative process and equal partnerships. Conditionality of compliance with EU values should be reserved to the IPA III context, where partners have an interest in joining the EU (and aligning themselves with EU values and legal framework).

- To ensure that EU values and principles are promoted through its external cooperation, the EU should adopt a people-centred approach, refocussing on sustainable development and allocating more resources to human development. In that context, respondents further highlighted the importance of ensuring that a balance is struck between using external instruments to promote the EU’s geopolitical interests, and the interests and priorities of partner countries, particularly when it comes to development objectives. The focus on thematic priorities through six investment windows in the EFSD+ has allowed the instrument to both focus on and promote EU values in partner countries. In addition to this, the creation of the Global Gateway strategy and of Team Europe Initiatives has strengthened the focus on those investments that are most in line with EU policies and priorities, thus contributing to the promotion of these priorities in partner countries.

- In the context of unmet international targets on climate change and biodiversity protection by the EU, there are voices concerned that the repercussions on partner countries will undermine the promotion and implementation of EU values, priorities and interests worldwide.

- In the context of value-based external action, technical cooperation is a good instrument to help embedding EU values, standards and policy approaches in policy dialogue with partner countries.

**EU added value**

- There are calls to prioritize investment in human development over investments in hard infrastructure, as a key area for the EU’s added value. Shifting away from more ‘traditional’ human development could leave significant gaps in EU support to partners.

- One respondent recognizes the added value of regional programmes, especially regional public technical cooperation programs in regions such as LAC. They bring better policy coherence and coordination between different countries, raise to regional fora issues that can’t be dealt with nationally and build policy dialogue spaces that nurture EU bi-regional political dialogues (beyond relations between EU and individual countries). According to the respondent, proper fund allocation for regional programs must be ensured and coordination and synergies with 1) national and 2) cross-regional ones.

- According to some voices, a value-based cooperation and external action is seen by partner countries as a hallmark and distinctive asset of the EU, especially vis-à-vis other global actors.
Synthesis report – In-country stakeholder survey


Objectives of the consultation

The objective of the partner country stakeholder survey, which took place from 19 July to 6 September 2023 (open for 7 weeks), was to gather stakeholders’ views and experience on the EU’s EFIs for the Multiannual Financial Frameworks 2014-2020 and 2021-2027 in the context of their ongoing evaluation. The questionnaire consisted of 3 thematic sections with a total of 10 questions. The questionnaire was available in English.

The partner country stakeholder survey targeted Civil Society Organisations (CSOs) and National authorities in EU partner countries. In total, 336 persons in the 17 sample countries (474) were contacted to reply to the e-survey. This summary report on the results of the consultation provides an overview of the received responses. Annex 3 above presents an overview of the respondents by country and organisation.

Main responses

Familiarity with EU external action instruments

Question 1  How familiar are you with the EU external action instruments on a scale from 0 (not at all) to 10 (highly familiar) …

![Graph showing familiarity with EU external action instruments]

N = 92

Asked about their familiarity with the EU external action instruments before 2021, respondents on average indicated 5.74 (on a scale from 0 to 10). National authorities’ familiarity on average was slightly higher (6.29) than CSOs’ (5.28). When asked about their familiarity with the EU external instruments now, the average of respondents’ answers has increased for all stakeholder groups to 6.63 in total, with respondents from national authorities feeling slightly more familiar (6.93) than CSO respondents (6.38).

Clarity of EU’s priorities

Question 2  Currently, would you say that the EU’s external cooperation priorities* in your country are…

![Graph showing clarity of EU’s priorities]

The vast majority of respondents from both CSOs and national authorities agreed that the EU’s external cooperation priorities in their countries were very clear or rather clear (above 80%). The share of respondents selecting ‘very clear’ was considerably higher among national authorities (39 % vs 16 % among CSOs).

When asked about the evolution since 2021, most respondents among both groups (55 %) indicate the EU’s external cooperation priorities have been equally clear before and after 2021.

**Question 3** Since 2021, have the EU’s external cooperation priorities in your country become ...

![Bar Chart](image)

- **Clearer than before 2021**
- **As clear as before 2021**
- **Less clear than before 2021**

Of the respondents who replied that EU priorities became clearer than before, some added qualitative comments that have been summarised below.

- In line with the changing political landscape, development partners like EU have become clearer about their priorities.
- The EU has offered consultation spaces and improved on hosting conversations with civil society to discuss and present priorities to them. In some countries, civil society was able to directly participate to the drafting of the roadmap on EU’s engagement with the civil society.
- By accompanying big infrastructure projects, the EU managed to increase its cooperation by taking into consideration national priorities.
- Other respondents stress that the increased clarity comes from them becoming more familiar with the application process for EU funding.

Some respondents who replied that EU priorities remained as clear as before.

- Some have expressed that there has not been any change, and that some negotiation processes have remained at standstill. In theory, the priorities for IPA are very clear i.e., to prepare the country for membership. However, some membership perspectives have been lost in the recent years, thus making it difficult to say that the priorities for assistance are clear. Another comment on IPA stressed that it should be the EU’s instrument to support beneficiaries’ preparation for membership, yet its structure differs substantially from that of European structural and investment funds (ESIF).
- After 2018 when a different modality of implementation of IPA II was in place such as Annual Action Programme, Direct and Indirect management, Sector Budget Support has become confusing to some. They do not have all information and progress of the actions / projects from the first hand as was with IPA I when implementation was based on Multi -Annual Operational Programme.
- The EU usually socializes its multiannual indicative plan in the country and consults to define priorities in its calls for proposals and roadmap. There are weaknesses in the follow-up of these dialogues.

Finally, some have replied that EU priorities are less clear than before because of:

- Frequent replacement of project managers and their bureaucratic approach to project implementation hinders effective work.
- Terms of reference are sometimes developed without active participation from beneficiaries. Selection of consultants / firms are often done without involvement of beneficiaries which can result in some questionable consultants who produced low levels of outputs.
Programming of EU support

Question 4  Compared to before 2021, would you say that the planning / programming of EU support in recent years has responded to the needs of the citizens…

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<th>Public authorities</th>
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<td>Better</td>
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<td>Worse</td>
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N = 92

With regards to **EU support’s responsiveness to the needs of citizens**, the slight majority of respondents (51%) found that it has improved compared to before 2021. CSOs’ perceptions on this were slightly more positive compared to national authorities, with 55% seeing an improvement and only 6% a deterioration, compared to 46% and 12% among national authorities’ respondents.

Question 5  Compared to before 2021, would you say that the planning / programming of EU support has become…with national policy priorities and interests

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<th>Public authorities</th>
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<td>More aligned</td>
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<td>As aligned as before</td>
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<td>Less aligned</td>
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N = 91

In terms of **alignment of EU support with national policy priorities and interests**, almost half of the respondents found that it had improved compared to before 2021. Perceptions of national authorities and CSOs varied significantly: While the majority of CSO respondents saw an improvement (57%), national authorities were less positive, with only 40% of respondents sharing this view, while the majority found EU support to be as aligned as before or even less aligned.
Question 6  Would you say that, since 2021, the relationship of national public institutions with the EU has become…

![Graph showing the distribution of responses to the question about the relationship of national public institutions with the EU.]

N = 92

A similar trend is visible in respondents’ views on the evolution of the EU’s relationship with national public institutions. While a slight majority of respondents note a stronger relationship compared to before 2021, CSOs respondents’ views were more positive, with 61% noticing an improvement, while among national authorities’ respondents only 41% share this view. It is also interesting to note that more than 20% of total respondents found the relationship to be less strong compared to before 2021.

Question 7  Would you say that, since 2021, the EU’s dialogue with CSOs (including the consultations held during the programming of EU support) in your country has become…

### Dialogue with CSOs in general

![Graph showing the distribution of responses to the question about the EU’s dialogue with CSOs in general.]

N = 91 (including 13 respondents who selected ‘don’t know’)

### Dialogue with local CSOs

![Graph showing the distribution of responses to the question about the EU’s dialogue with local CSOs.]

N = 86 (including 18 respondents who selected ‘don’t know’)

On the EU’s dialogue with CSOs, the majority of respondents found that dialogue since 2021 has become more frequent, both with CSOs in general as well as with local CSOs specifically. Interestingly, CSOs’ perceptions were again more positive than national authorities’ views, with most 60% of CSO respondents noticing a positive evolution, while among national respondents more than 50% noticed the same or less frequency of exchange.

(475) Respondents who selected “don’t know” were excluded from the graphs and from the statistical presentation of results in the text here and in the following questions. For transparency, their number (unless 0) is indicated below each graph.
Question 8   Would you say that, since 2021, CSOs’ access to EU funding in your country has become…

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<thead>
<tr>
<th>CSOs access to EU funding in general</th>
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<tr>
<td>Easier</td>
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<td>The same</td>
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<td>More difficult</td>
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| N = 91 (including 16 respondents who selected ‘don’t know’) |

<table>
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<th>Local CSOs’ access to EU funding</th>
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<td>Easier</td>
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<td>The same</td>
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| N = 86 (including 20 respondents who selected ‘don’t know’) |

In regard to CSOs’ access to EU funding, the majority of respondents find that access has been the same or has become more difficult since 2021 (69 % for CSOs in general, 62 % for local CSOs). Not surprisingly, CSO and national authorities’ respondents’ views differ substantially: Almost 30 % of CSO respondents find access for CSOs to be more difficult, while less than 10 % of national authorities share this view.

Box 5   Complementary information (incl. illustrative cases) to Question 7

Some respondents who replied that it has become easier to access EU funding for CSOs’ explained:

- It is easier to access financing for larger CSOs but direct financing from the EU remains difficult to access for smaller CSOs. Bureaucracy has increased substantially in the last two years, and the EU has required extensive paperwork from small CSOs for grants of EUR 5000. With such small grants, the amount of administration required detracts from their ability to implement their projects and achieve the foreseen results.

- Another comment stressed that grants are most available in the capital city.

Some respondents replied that access remained the same.

- The Civil Society Facility’s Calls for Proposals are very restrictive and only a handful of organisations can meet the criteria. Instead of having a list of CSOs working under this programme, it became very restrictive, as it depends on annual turnover of CSOs applying for it. Small local CSOs cannot fulfil all required selection criteria and therefore face difficulties in access EU funding.

- The 10 % contribution of local NGOs to EU projects is still one of the biggest barriers for assessing EU funding. Within those conditions the NGOs cannot compete with international organisations like UNDP, UNICEF etc.

- The EU has improved its outreach to local organisations through the labelling of cascade funds. Dialogue through the Roadmap and the effectiveness of the Liaison Group with human rights defenders should be improved.

For those who replied that access has become more difficult, reasons were:

- Access to EU funding requires a mastery of the technical language of cooperation and development, as well as the mastery of technical tools, which are not necessarily accessible to a large part of CSOs.

- Some respondents stressed they were still awaiting new EU funding since 2021, and others stressed that the mandatory inclusion of at least one local NGO restricted their willingness to apply.
EU Added Value and Overall assessment

**Question 9** Overall, compared to the previous financing instruments used in EU external action before 2021 (e.g., EDF, DCI, EIDHR, PI, IcSP, IPA II), do you think the new financing instruments since 2021 (e.g., NDICI-GE, IPA III) are…

![Bar chart showing responses to Question 9]

N = 92 (including 22 respondents who selected ‘don’t know’)

Only 44% of respondents found the new financing instruments to be better than the previous ones. CSOs’ and national authorities’ had similar views overall, with national authorities being slightly more negative than CSOs.

**Question 10** What are the top three elements that give added value to the EU’s engagement in your country compared to other international actors?

![Bar chart showing responses to Question 10]

N = 92 (each respondent could choose up to three elements; a total of 262 elements were selected)

In terms of added value to the EU’s engagement in respondents’ countries compared to other international actors, respondents found ‘funding’ to be the most relevant element (selected by 67% of respondents), followed by ‘long term commitment’ (55%) and ‘EU values’ (49%). Added value through ‘European expertise’ was highlighted in particular by national authorities’ respondents (17% vs. 3% of CSO respondents.)
Question 11  
Since 2021, would you say the added value of EU external cooperation has been…

![Bar chart showing the distribution of responses to the question about the added value of EU external cooperation since 2021. The chart shows the following categories: Strengthened, Stayed the same, Weakened. The chart also includes a comparison between public authorities and CSOs.]

*N = 91 (including 8 respondents who selected ‘don’t know’)*

Regarding the **evolution of added value of EU external cooperation** since 2021, almost 60% of respondents found added value to be strengthened. CSOs’ perceptions were overall more positive, with only one third of respondents answering that it stayed the same or was weakened (7% weakened), while among national authority respondents almost half of the respondents did not notice a positive development since 2021 (13% saw it weakened).

**Box 6  Complementary information (incl. illustrative cases) to Question 10**

Of the respondents who replied that added value of EU external cooperation has been strengthened, qualitative comments included:

- EU funders regularly engage with Government, and EU directives have been successfully translated into national legislation. The EU also works closely with both the government and the UN, convening regular meetings. EU support in political dialogue is very important, particularly as part of the EU Accession process.
- The added value of EU external cooperation has indeed been strengthened, both in terms of value and quality. Some fundings have been increased (despite COVID-19, economic and other burdens), some procedures have been slightly eased, some actions have been implemented more efficiently, while still adhering to the EU values that are unique in the world (sustainable development, good governance, inclusiveness etc.). An important feature is the long-term commitment as it allows for greater consistency of policies and actions. The war in Ukraine has shown that EU can be resilient (e.g., in finding alternative energy sources, facilitating unity despite challenges) and this momentum should be maintained for further EU leadership undertakings. EU’s external actions shall be streamlined towards faster integration of Western Balkan countries.
- Long term funding commitment in strategic way would be better than bidding in small and short term fundings.
- It is visible how EU funding included more value-based Call for Proposals, related to COVID-19, poverty, social inclusion, etc.

For those who replied that EU added value weakened, comments were as follows:

- Added value would comprise preparing beneficiaries for implementation of ESIF upon membership. But effectively, over time, IPA has distanced itself from ESIF, both in terms of programming and management procedures and in terms of involvement of the Commission’s DG’s. Moreover, the size of funding remains unrelated to the beneficiaries’ progress towards meeting membership criteria and insufficient to motivate hard political reforms.
- My opinion is that staff at the EUD are not supportive enough. Instead of pushing for the Union principles, there is a tendency to push personal agendas, as compared to the previous period.
- The financing instruments are better after 2021, since the actions are readier for implementation due to maturity assessment introduced in IPA III. However, added value weakened due to limited funding and lower number of projects, which diminished EU impact in the country.

**Synthesis report – Validation survey**

**Summary report on the survey to EUDs / Offices and HQ on the EFIs for the Multiannual Financial Frameworks 2014-2020 and 2021-2027.**

**Design and implementation of the e-survey**

The objective of the EUDs / Offices and HQ survey, which took place from 11 August to 10 September 2023 (open for 4 weeks), was to validate and generalise some of the team’s emerging findings on the EU’s EFIs for the MFF 2014-2020 and MFF 2021-2027 in the context of their ongoing evaluation.

The survey targeted all EUDs / Offices and HQ staff who had been interviewed in the previous weeks and months. In total, around 240 persons were contacted to reply to the e-survey – 91 from EU HQ and around 130 from EUD / Offices. EUDs / Offices and HQ Units contacted were asked to provide at least one response per EUD / Office / Unit.
The questionnaire was structured around 5 subjects: i) EU cooperation priorities; ii) Efficiency; iii) Flexibility; iv) Team Europe and EU added value; and v) EU’s leverage. Respondents were asked to express to what extent they agreed with some statements around the subjects, formulated on the basis of the information previously collected by the team. Respondents were given five answering options to choose from: Strongly Agree, Somewhat Agree, Somewhat Disagree, Strongly Disagree and Do not know. The questionnaire was available in English.
This summary report on the results of the consultation provides an overview of the received responses.

Main responses

Understanding of EU EFIs
As shown in Question 1 below, the respondents were asked, based on their experience, to what extent current EFIs are understood by a variety of stakeholders, including European Development Financial Institutions (DFIs), EU Member States (Civil Society Organisations (CSOs) and Local Authorities, and National governments and regional partners. The vast majority of respondents agree that EFIs are partially understood or fully understood by all stakeholders (on average above 70%). In particular, 83% of respondents believe that DFIs and EU Member states have fully or partially understood current EFIs. Notably, 20% agree that DFIs have fully understood current EFIs, and only one respondent claims that they have not understood them at all.
While the percentage of respondents who claim that DFIs and EU Member States have not understood at all current EFIs at all is negligible – 1% and 7% respectively – the percentage is higher with regard to CSOs and National Government and regional partners, 20% and 16% respectively.

Question 1 Extent to which current EFIs are understood by a variety of stakeholders

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Fully understood</th>
<th>Partially understood</th>
<th>Not at all</th>
<th>Do not know</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development Financial Institutions (DFIs)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EU Member States</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CSOs and local authorities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>National governments and regional partners</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

When asked how they perceive their own understanding of the current EFIs, HQ staff consider themselves slightly less knowledgeable about current EFIs than EUD staff. 31% of respondents from EU HQ believe that HQ staff has fully understood current EFIs, while 46% of respondents from EUD / Office agree that EFIs are currently fully understood by EUD staff.
**EU cooperation priorities**

The first question was about the extent to which respondents agreed to a series of statements about **EU cooperation priorities at country / regional level related to the EFIs of the new Multiannual Financial Framework (MFF) 2021-2027** (compared to the ones of the MFF 2014-2020).

### Question 3 Statements on Partnership

- The current EFIs and underpinning ‘Policy first’ approach have helped to strengthen the strategic focus of EU programming.
- Activities of financial institutions in the context of EFSD+ are aligned with EU policy priorities.
- (For African, Caribbean and Pacific Group of States only) The budgetisation of the 11th EDF has resulted in efficiency gains.
- The current EFIs and underpinning ‘Policy first’ approach have helped to strengthen the partnership with national governments.
- (For African, Caribbean and Pacific Group of States only) The budgetisation of the 11th European Development Fund (EDF) has been well understood by all partners and well-integrated in new programming and aid delivery processes resulting in efficiency gains.
- The current EFIs improve the ability of the EU to engage strategically with local authorities and provide direct funding to them.
- The current EFIs and underpinning ‘Policy first’ approach have helped to strengthen the partnership with relevant regional actors.
- Access to EU funding by local CSOs has become easier under the current EFIs.

**Note:** Two statements (see above) were to be answered by African, Caribbean and Pacific Group of States only, thus were answered by 62 out of 82 respondents (N=62). In all the other statements, all respondents expressed their view (N=82).

As shown in Question 4, respondents’ views regarding the current instruments’ positive effects on partnerships were mixed. The vast majority of respondents find that the current EFIs and underpinning the Policy first approach have helped to strengthen the strategic focus of EU programming and that the activities of financial institutions in the context of the EFSD+ are aligned with EU policy priorities. Respondents are less unanimous in regard to whether the current EFIs have helped to strengthen the partnership with national governments (40 % agree while 49 % disagree).

44 % of respondents answered that the budgetisation of the 11th EDF has resulted in efficiency gains, while 37 % agree that the budgetisation of the 11th EDF has been well understood by all partners and well-integrated in new programming and aid delivery processes resulting in efficiency gains. The share of positive feedbacks increase considerably – to 73 % and 52 % respectively – if we don’t take into account the high number of respondents who chose ‘Do not know’ as an answer.

The majority of respondents somewhat disagrees (51 %) or strongly disagrees (20 %) with the fact that access to EU funding by local CSOs has become easier under the current EFIs. Similarly, a majority of respondents...
did not see an improvement in the ability of the EU to engage strategically with Local Authorities, nor believes that the current EFIs underpinning the Policy first approach have helped to strengthen the partnership with relevant regional actors.

**Question 4**  
**Statements on the responsiveness to EU policy and political priorities**

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly agree</th>
<th>Somewhat agree</th>
<th>Somewhat disagree</th>
<th>Strongly disagree</th>
<th>Do not know</th>
</tr>
</thead>
<tbody>
<tr>
<td>The current EFIs are flexible enough to respond to developments in the EU external action policy framework (e.g., Global Gateway).</td>
<td>10%</td>
<td>56%</td>
<td>34%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>The use of targets has helped to mainstream EU policy priorities in programming and implementation of EU cooperation.</td>
<td>20%</td>
<td>71%</td>
<td>9%</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

In regard to responsiveness of current EFIs to EU policy and political priorities, overall responses were very positive in regard to flexibility of the instrument and slightly positive about its suitability for mainstreaming EU policy priorities. More than half of respondents agree that the current EFIs are flexible enough to respond to developments in the EU external action policy framework (e.g., Global Gateway). 10 % strongly agree with this position, and 56 % somewhat agree. Views differ on whether the use of targets has helped to mainstream EU policy priorities in programming and implementation of EU cooperation. A slight majority (51 % not considering those who do not know) agrees to some extent.

**Question 5**  
**Statements on Coherence**

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly agree</th>
<th>Somewhat agree</th>
<th>Somewhat disagree</th>
<th>Strongly disagree</th>
<th>Do not know</th>
</tr>
</thead>
<tbody>
<tr>
<td>The NDICI-GE ensures better coherence and complementarity between geographic, thematic and Rapid Response pillars.</td>
<td>39%</td>
<td>61%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>The current EFIs have helped to increase the involvement of relevant Commission line DGs in programming of EU external cooperation.</td>
<td>30%</td>
<td>57%</td>
<td>13%</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

Both statements regarding the coherence of current EFIs have been considered overall positively by respondents. More than half of respondents (59 %, or 67 % not considering the option do not know) agree that NDICI-GE ensures better coherence and complementarity between geographic, thematic and Rapid Response pillars. A majority of respondents also agrees that the current EFIs have helped to increase the involvement of relevant Commission line DGs in programming of EU external cooperation (53 %, or 57 % not considering the option do not know).
Efficiency
In this section, respondents were asked whether they agreed with some statements regarding the programming and implementation under the current MFF 2021-2027 (compared to the MFF 2014-2020).

**Question 6** Statements on Efficiency

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly agree</th>
<th>Somewhat agree</th>
<th>Somewhat disagree</th>
<th>Strongly disagree</th>
<th>Do not know</th>
</tr>
</thead>
<tbody>
<tr>
<td>The reduced number of regulations under the current EFIs has helped simplifying EU programming and implementation.</td>
<td>6%</td>
<td>17%</td>
<td>19%</td>
<td>1%</td>
<td>57%</td>
</tr>
<tr>
<td>The current EFIs have reduced workload during programming for the main national partners involved in the process (e.g., central authorities, civil society, local authorities etc.).</td>
<td>12%</td>
<td>22%</td>
<td>32%</td>
<td>15%</td>
<td>21%</td>
</tr>
<tr>
<td>The current EFIs have reduced EUDs’ amount of work dedicated to communication and consultations with partners (e.g., governments, civil society, international/regional organisations, etc.) for…</td>
<td>14%</td>
<td>21%</td>
<td>26%</td>
<td>22%</td>
<td>27%</td>
</tr>
<tr>
<td>The current EFIs have reduced the amount of work dedicated to communication and consultations with EU Member States for programming and implementation.</td>
<td>10%</td>
<td>16%</td>
<td>19%</td>
<td>24%</td>
<td>31%</td>
</tr>
</tbody>
</table>

N=82

According to e-survey respondents, while the majority of respondents acknowledge a simplification of EU programming and implementation introduced by the current EFIs (66 %, or 73 % not including do not know), this simplification does not result in a reduction of workload for all stakeholders involved. More than half of respondents state that the current EFIs have not reduced the amount of work during programming for the main national partners (47 % including do not know answers, and 58 % excluding them); nor they have reduced the workload for communication and consultations with partners (59 %, or 70 % not including do not know answers) or Member states (68 %, or 83 % not including do not know). Notably, 23 out of 82 respondents strongly disagree about the reduction of workload in communication and consultation with EU Member States for programming and implementation.

Flexibility
Respondents were then asked their opinion on some statements regarding flexibility under the current MFF 2021-2027 (compared to the MFF 2014-2020). Given the elevate number of Do not know answers received for the three statements (12 %, 21 % and 39 % respectively), Question 7 considers or not the option for a better data visualisation.

**Question 7** Statements on Flexibility

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly agree</th>
<th>Somewhat agree</th>
<th>Somewhat disagree</th>
<th>Strongly disagree</th>
<th>Do not know</th>
</tr>
</thead>
<tbody>
<tr>
<td>The current EFIs have reduced the amount of work dedicated to communication and consultations with EU Member States for programming and implementation.</td>
<td>10%</td>
<td>16%</td>
<td>19%</td>
<td>24%</td>
<td>31%</td>
</tr>
</tbody>
</table>

N=82

Overall levels of flexibility have increased compared to previous MFF.

The current EFIs help to increase the availability of funding for emerging needs and challenges in my country/region (through e.g., the cushion, rapid response).

The current EFIs allow to effectively support actions along the humanitarian-development-peace nexus.
According to the majority of respondents, overall levels of flexibility have increased compared to the previous MFF. Respondents are less unanimous in regard to whether the current EFIs help to increase the availability of funding for emerging needs and challenges in their country/region. 56% disagree, with 25% of them strongly disagreeing.

Notably, a great number of respondents (32 out of 82, 39%) seem to not know whether the current EFIs allow to effectively support actions along the Humanitarian-Development-Peace nexus. Among the rest, the majority (62%) agree that the current EFIs allow for better support.

**Team Europe and EU added value**

In this section of the e-survey, respondents were asked to express their agreement or disagreement with a series of statements related to **EU added value and collective efforts at European level under the new EFIs** (compared to the MFF 2014-2020).

**Question 8 Statements on Team Europe and EU added value**

The current EFIs are suitable to foster a Team Europe approach. Overall the responses to all three statements on Team Europe and EU added value are positive, with the majority of respondents suggesting that the current EFIs contribute to fostering a Team Europe approach and the values agenda through external action, and to mobilising and sharing knowledge and expertise of EU Member States.

**EU’s leverage**

Lastly, respondents were asked to express their opinion on a series of statements related to **EU’s leverage and the use of specific forms of support under the new EFIs (compared to the MFF 2014-2020)**. Given the number of *Do not know* options chosen by respondents (more than 10% of answers for 4 out of 6 statements), Question 9 shows responses including or excluding the option for better data visualisation.
Question 9  
**Statements on EU’s leverage**

### Statements on EU’s leverage – including ‘Do not know’ answers

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly agree</th>
<th>Somewhat agree</th>
<th>Somewhat disagree</th>
<th>Strongly disagree</th>
<th>Do not know</th>
</tr>
</thead>
<tbody>
<tr>
<td>The current EFIs contribute to strengthening the EU’s ability to address global challenges, resulting in a stronger global voice in the world.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The current EFIs contribute to enhancing EU’s leverage to address challenges at country and regional level</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The current EFIs (including the use of public diplomacy) make the EU an attractive partner compared to other global actors.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The current EFIs have helped the EU to better combine different modalities and tools (e.g. financial means, political and policy dialogue, technical assistance…) to promote EU external priorities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The current EFIs contribute to strengthening the EU’s ability to project the external dimension of the EU’s internal policies in high-income and middle-income countries.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>There are good prospects for using EFSD+ guarantees to leverage private finance at country level.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

N=82

### Statements on EU’s leverage – excluding ‘Do not know’ answers

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly agree</th>
<th>Somewhat agree</th>
<th>Somewhat disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>The current EFIs contribute to strengthening the EU’s ability to address global challenges, resulting in a stronger global voice in the world.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>The current EFIs contribute to enhancing EU’s leverage to address challenges at country and regional level</td>
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<td></td>
<td></td>
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<tr>
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<td></td>
<td></td>
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</tr>
<tr>
<td>The current EFIs have helped the EU to better combine different modalities and tools (e.g. financial means, political and policy dialogue, technical assistance…) to promote EU external priorities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The current EFIs contribute to strengthening the EU’s ability to project the external dimension of the EU’s internal policies in high-income and middle-income countries.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>There are good prospects for using EFSD+ guarantees to leverage private finance at country level.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

N=78, N=77, N=74, N=53, N=73, N=63

As clearly shown by the Statements on EU’s leverage excluding the Do not know answer, the majority of respondents agree with all but one statement on EU’s leverage. Notably, over 80% of respondents agree that current EFIs contribute to enhancing EU’s leverage to address challenges at country and regional level, and 71% believe that they have helped the EU to better combine different modalities and tools to promote EU external priorities.

Respondents are less unanimous with regard to whether there are good prospects for using EFSD+ guarantees to leverage private finance at country level. 52% disagree (not considering Do not know), of whom 22% strongly disagree. 48% agree, of whom 8% strongly agree. Notably, 19 respondents chose Do not know.

Lastly, it is to be noted that 29 respondents Do not know whether the current EFIs contribute to strengthening the EU’s ability to project the external dimension of the EU’s internal policies in high-income and middle-income countries.
Annex 6 – Mapping and financial overview

As part of its work, the Evaluation Team has conducted a mapping exercise to further shed light on the financial characteristics of the previous and current EFI architecture.

Planned multi-annual financial envelopes (as per regulations)

The following table presents the multi-annual financial envelopes related to the EFIs of the previous MFF (2014-2020) as laid down in the respective regulations. Figure 11 further below provides a visual overview and presents figures based on the respective regulations.

Table 16 Multi-annual financial envelopes of the previous MFF (2014-2020)

<table>
<thead>
<tr>
<th>Instrument</th>
<th>Previous MFF 2014-2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>11th European Development Fund (EDF), incl. ‘envelope B’</td>
<td>EUR 30,506 million</td>
</tr>
<tr>
<td>Development Cooperation Instrument (DCI) – geographic programmes</td>
<td>EUR 12,654 million</td>
</tr>
<tr>
<td>European Neighbourhood Instrument (ENI)</td>
<td>EUR 15,433 million</td>
</tr>
<tr>
<td>Instrument for Pre-Accession Assistance (IPA II)</td>
<td>EUR 11,699 million</td>
</tr>
<tr>
<td>Instrument for Greenland (GD)</td>
<td>EUR 217 million</td>
</tr>
<tr>
<td><strong>Horizontal instruments</strong></td>
<td></td>
</tr>
<tr>
<td>Development Cooperation Instrument (DCI) – thematic programmes</td>
<td>EUR 7,008 million</td>
</tr>
<tr>
<td>Instrument contributing to Stability and Peace (IcSP)</td>
<td>EUR 2,339 million</td>
</tr>
<tr>
<td>European Instrument for Democracy and Human Rights (EIDHR)</td>
<td>EUR 1,333 million</td>
</tr>
<tr>
<td>Partnership Instrument (PI)</td>
<td>EUR 955 million</td>
</tr>
<tr>
<td>Instrument for Nuclear Safety Cooperation (INSC)</td>
<td>EUR 225 million</td>
</tr>
<tr>
<td><strong>Total envelope</strong></td>
<td>EUR 82,369 million</td>
</tr>
</tbody>
</table>

Source: EFI regulations

The 11th EDF was the largest single instrument during the previous MFF, accounting for almost 40% of the entire envelope. The geographic instruments represent the biggest share of the overall EFI architecture. This observation still holds true for the current MFF, where again geographic budget lines (mainly Pillar 1 of NDICI-GE and IPA III) make up for more than three quarters of the entire envelope (see Table 17). Figure 12 further below provides a visual overview and presents figures based on the respective regulations.

Table 17 Multi-annual financial envelopes of the current MFF (2021-2027)

<table>
<thead>
<tr>
<th>Instrument</th>
<th>Current MFF 2021-2027</th>
</tr>
</thead>
<tbody>
<tr>
<td>Neighbourhood, development and international cooperation instrument – Global Europe (NDICI-GE)</td>
<td>EUR 60,388 million</td>
</tr>
<tr>
<td>Pillar 1: Geographic programmes</td>
<td>EUR 6,358 million</td>
</tr>
<tr>
<td>Pillar 3: Rapid response actions</td>
<td>EUR 3,182 million</td>
</tr>
<tr>
<td>Emerging challenges and priorities cushion</td>
<td>EUR 9,534 million</td>
</tr>
<tr>
<td><strong>Other instruments</strong></td>
<td></td>
</tr>
<tr>
<td>Instrument for Pre-Accession Assistance (IPA III)</td>
<td>EUR 14,162 million</td>
</tr>
<tr>
<td>Decision on the Overseas Association including Greenland (DOAG)</td>
<td>EUR 500 million</td>
</tr>
<tr>
<td>European Instrument for International Nuclear Safety Cooperation (INSC)</td>
<td>EUR 300 million</td>
</tr>
<tr>
<td><strong>Total envelope</strong></td>
<td>EUR 94,424 million</td>
</tr>
</tbody>
</table>

Source: EFI regulations

---

(476) The EDF ‘envelope B’ can be used to cover unforeseen needs.
(477) Of which EUR 29,089 million for ACP countries, EUR 364.5 million for OCTs and EUR 1,052.5 million for support expenditures.
(478) Of which EUR 11,809 million for (non-ACP) geographic programmes and EUR 845 million for the Pan-African programme.
(479) This only refers to the total envelope of instruments covered by this evaluation. Other MFF instruments not covered include for example HUMA and CFSP.
(480) This only refers to the total envelope of instruments covered by this evaluation. Other MFF instruments not covered include HUMA, CFSP and the EPF.
Figure 11  Overview of EFIs under the previous MFF 2014-2020

MFF 2014-2020
Heading IV Instruments and EDF

Package adopted on 7/12/11 (EUR 96.2 bn in current price - 85%)

Instruments

- European Instrument for Democracy & Human Rights (EUR 1,333 b million)
- Instrument for Stability (EUR 2,339 million)
- Instrument for Nuclear Safety Cooperation (EUR 225 million)

Development Cooperation Instrument (EUR 19,662 million)
- Thematic Programs
- Global Public Goods
- Non-State Actors & Local Authorities
- Pan-African Programme

European Neighbourhood Instrument (EUR 15,433 million)

Pre-Accession Instrument (EUR 11,699 million)

Partnership Instrument (EUR 955 million)

Greenland Instrument (EUR 217.8 million)

11th EDF (EUR 30,506 million) (outside budget)

Common Implementing Regulation (except Greenland and EDF)

Other MFF instruments NOT in the package 7/12/2011 (EUR 17.2 bn in current price - 15%)

HUMA, CFSP, MACRO, EVHAC, CPFI, GUARANTEE FUND, AGENCIES

Source: EFI overview presented by the Core ISG.
Final structure of external instruments for the 2021-2027 period

Total Heading VI: EUR 110,597 million in current prices

### Geographical Programmes
- **European Neighbourhood** (at least EUR 19,332 million)
- **Sub-Saharan Africa** (at least EUR 29,181 million)
- **Asia and the Pacific** (EUR 8,489 million)
- **Americas and the Caribbean** (EUR 3,395 million)

### Thematic Programmes
- **Human Rights & Democracy** (EUR 1,362 million)
- **Civil Society Organisations** (EUR 1,362 million)
- **Peace, Stability and Conflict Prevention** (EUR 908 million)
- **Global Challenges** (EUR 2,726 million)

### Rapid Response Actions
- **Peace, stability and conflict prevention in situations or urgency. Emerging crisis, crisis and post-crisis, including those which may result from migration flows and forced displacement**
- **Strengthening resilience and linking humanitarian aid and development action and, where relevant, peacebuilding**
- **Union foreign policy needs and priorities**

### Emerging Challenges and Priorities Cushion
- **Emerging Challenges and Priorities Cushion** (EUR 9,534 million)

### Unallocated Amount under Heading 6 as of 1 January 2021
- **Unallocated amount under Heading 6 as of 1 January 2021** (EUR 684 million)

### Other
- **Other** (EUR 1,242 million)

### OCT + GD
- **OCT + GD** (EUR 500 million)

### CFSP
- **European Instrument for International Nuclear Safety Cooperation** (EUR 300 million)

### Humanitarian Aid
- **Humanitarian Aid** (EUR 11,569 million)

### European Peace Facility
- **European Peace Facility** (EUR 5,000 million)*

* Acronyms:
  - bn: billion
  - GD: Greenland
  - OCT: Overseas Countries and Territories

* not included in the budget

Source: EFI overview presented by the Core ISG.
Implementation figures – Mapping

Overview by instruments

Table 18  Distribution of Commitments by instrument for 2014-2020

<table>
<thead>
<tr>
<th>Instrument</th>
<th>Commitments (in EUR million)</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>11th European Development Fund (EDF), incl. ‘envelope B’</td>
<td>29,259</td>
<td>32.6 %</td>
</tr>
<tr>
<td>European Neighbourhood Instrument (ENI)</td>
<td>17,596</td>
<td>19.6 %</td>
</tr>
<tr>
<td>Instrument for Pre-Accession Assistance (IPA II)</td>
<td>14,421</td>
<td>16.0 %</td>
</tr>
<tr>
<td>Development Cooperation Instrument (DCI) – geographic programmes</td>
<td>11,550</td>
<td>12.9 %</td>
</tr>
<tr>
<td>Development Cooperation Instrument (DCI) – thematic programmes</td>
<td>8,139</td>
<td>9.1 %</td>
</tr>
<tr>
<td>Instrument contributing to Stability and Peace (IcSP)</td>
<td>2,170</td>
<td>2.4 %</td>
</tr>
<tr>
<td>European Instrument for Democracy and Human Rights (EIDHR)</td>
<td>1,255</td>
<td>1.4 %</td>
</tr>
<tr>
<td>Partnership Instrument (PI)</td>
<td>942</td>
<td>1.0 %</td>
</tr>
<tr>
<td>European Fund for Sustainable Development (EFSD)</td>
<td>799</td>
<td>&lt; 1 %</td>
</tr>
<tr>
<td>Development Cooperation Instrument (DCI) – other</td>
<td>510</td>
<td>&lt; 1 %</td>
</tr>
<tr>
<td>Instrument for Nuclear Safety Cooperation (INSC)</td>
<td>318</td>
<td>&lt; 1 %</td>
</tr>
<tr>
<td>Instrument for Greenland (GD)</td>
<td>217</td>
<td>&lt; 1 %</td>
</tr>
<tr>
<td>Other</td>
<td>2,677</td>
<td>3.0 %</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>89,853</strong></td>
<td><strong>100 %</strong></td>
</tr>
</tbody>
</table>

Source: Annual Reports on the implementation of the European Union’s External Action Instruments (2017 to 2022).

Table 19  Distribution of Commitments by instrument for 2021-2022

<table>
<thead>
<tr>
<th>Instrument</th>
<th>Commitments (in EUR million)</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>NDICI-GE Pillar 1: Geographic programmes</td>
<td>13,312</td>
<td>48.6 %</td>
</tr>
<tr>
<td>NDICI-GE Pillar 2: Thematic programmes</td>
<td>3,889</td>
<td>14.2 %</td>
</tr>
<tr>
<td>NDICI-GE Pillar 3: Rapid response actions</td>
<td>1,755</td>
<td>6.4 %</td>
</tr>
<tr>
<td>Instrument for Pre-Accession Assistance (IPA III)</td>
<td>3,891</td>
<td>14.2 %</td>
</tr>
<tr>
<td>Decision on the Overseas Association including Greenland (DOAG)</td>
<td>135</td>
<td>0.5 %</td>
</tr>
<tr>
<td>European Instrument for International Nuclear Safety Cooperation (INSC)</td>
<td>74</td>
<td>0.3 %</td>
</tr>
<tr>
<td>European Fund for Sustainable Development + (EFSD+)*</td>
<td>3,393</td>
<td>12.4 %</td>
</tr>
<tr>
<td>Other</td>
<td>920</td>
<td>3.4 %</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>27,369</strong></td>
<td><strong>100 %</strong></td>
</tr>
</tbody>
</table>

Source: Annual Reports on the implementation of the European Union’s External Action Instruments (2017 to 2022).

Table 20  Overview of Commitments and Payments per instrument (2017-2020)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>11th European Development Fund (EDF), incl. ‘envelope B’</td>
<td>5,137</td>
<td>3,412</td>
<td>4,602</td>
<td>3,585</td>
<td>2,856</td>
<td>3,471</td>
<td>3,432</td>
<td>4,249</td>
</tr>
<tr>
<td>European Neighbourhood Instrument (ENI)</td>
<td>2,428</td>
<td>1,946</td>
<td>2,451</td>
<td>2,062</td>
<td>2,697</td>
<td>1,997</td>
<td>2,816</td>
<td>2,486</td>
</tr>
<tr>
<td>Development Cooperation Instrument (DCI) – geographic programmes</td>
<td>1,713</td>
<td>1,442</td>
<td>1,752</td>
<td>1,481</td>
<td>1,865</td>
<td>1,450</td>
<td>1,936</td>
<td>1,623</td>
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<tr>
<td>Instrument for Pre-Accession Assistance (IPA II)</td>
<td>2,031</td>
<td>1,517</td>
<td>2,015</td>
<td>1,345</td>
<td>2,912</td>
<td>1,496</td>
<td>1,727</td>
<td>1,853</td>
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<tr>
<td>Development Cooperation Instrument (DCI) – thematic programmes</td>
<td>1,373</td>
<td>996</td>
<td>1,166</td>
<td>1,109</td>
<td>1,307</td>
<td>1,072</td>
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<tr>
<td>Instrument contributing to Stability and Peace (IcSP)</td>
<td>259</td>
<td>247</td>
<td>333</td>
<td>321</td>
<td>364</td>
<td>308</td>
<td>400</td>
<td>367</td>
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<tr>
<td>---------------------------------------------------------------------------</td>
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<td>---------------</td>
<td>------------------</td>
<td>---------------</td>
<td>------------------</td>
<td>---------------</td>
</tr>
<tr>
<td>European Instrument for Democracy and Human Rights (EIDHR)</td>
<td>176</td>
<td>145</td>
<td>172</td>
<td>173</td>
<td>164</td>
<td>141</td>
<td>164</td>
<td>138</td>
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<tr>
<td>Partnership Instrument (PI)</td>
<td>134</td>
<td>77</td>
<td>143</td>
<td>114</td>
<td>149</td>
<td>128</td>
<td>161</td>
<td>125</td>
</tr>
<tr>
<td>Instrument for Nuclear Safety Cooperation (INSC)</td>
<td>53</td>
<td>71</td>
<td>32</td>
<td>38</td>
<td>32</td>
<td>34</td>
<td>31</td>
<td>13</td>
</tr>
<tr>
<td>Instrument for Greenland (GD)</td>
<td>32</td>
<td>30</td>
<td>32</td>
<td>30</td>
<td>33</td>
<td>29</td>
<td>33</td>
<td>33</td>
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<tr>
<td>Development Cooperation Instrument (DCI) – other</td>
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<td>109</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<td>0</td>
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</table>

Source: Annual Reports on the implementation of the European Union’s External Action Instruments (2017 to 2022).

Table 21: Overview of Commitments and Payments per instrument (2021-2022)

<table>
<thead>
<tr>
<th>Budget position</th>
<th>2021 Commitments</th>
<th>2021 Payments</th>
<th>2022 Commitments</th>
<th>2022 Payments</th>
</tr>
</thead>
<tbody>
<tr>
<td>14.010101 – Support expenditure for the Neighbourhood, Development and International Cooperation Instrument</td>
<td>301</td>
<td>244</td>
<td>300</td>
<td>261</td>
</tr>
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<td>14.010165 – European Education and Culture Executive Agency – Contribution from the Neighbourhood, Development and International Cooperation Instrument</td>
<td>4</td>
<td>4</td>
<td>0</td>
<td>0</td>
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<tr>
<td>14.010175 – European Education and Culture Executive Agency – Contribution from the Neighbourhood, Development and International Cooperation Instrument – Global Europe</td>
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<td>0</td>
<td>6</td>
<td>6</td>
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<tr>
<td>14.020110 – Neighbourhood South region</td>
<td>1,052</td>
<td>90</td>
<td>1,694</td>
<td>542</td>
</tr>
<tr>
<td>14.020111 – Neighbourhood East region</td>
<td>296</td>
<td>101</td>
<td>1,121</td>
<td>910</td>
</tr>
<tr>
<td>14.020112 – Neighbourhood – Territorial and cross-border cooperation and supporting measures</td>
<td>4</td>
<td>0</td>
<td>56</td>
<td>0</td>
</tr>
<tr>
<td>14.020120 – West Africa</td>
<td>1,689</td>
<td>10</td>
<td>951</td>
<td>280</td>
</tr>
<tr>
<td>14.020121 – East and Central Africa</td>
<td>1,313</td>
<td>5</td>
<td>1,271</td>
<td>348</td>
</tr>
<tr>
<td>14.020122 – Southern Africa and Indian Ocean</td>
<td>193</td>
<td>0</td>
<td>1,063</td>
<td>44</td>
</tr>
<tr>
<td>14.020130 – Middle East and Central Asia</td>
<td>376</td>
<td>0</td>
<td>366</td>
<td>79</td>
</tr>
<tr>
<td>14.020131 – South and East Asia</td>
<td>388</td>
<td>0</td>
<td>551</td>
<td>37</td>
</tr>
<tr>
<td>14.020132 – The Pacific</td>
<td>61</td>
<td>0</td>
<td>120</td>
<td>4</td>
</tr>
<tr>
<td>14.020140 – The Americas</td>
<td>258</td>
<td>0</td>
<td>272</td>
<td>30</td>
</tr>
<tr>
<td>14.020141 – The Caribbean</td>
<td>112</td>
<td>0</td>
<td>106</td>
<td>8</td>
</tr>
<tr>
<td>14.020150 – Erasmus+ – NDICI – Global Europe contribution</td>
<td>20</td>
<td>0</td>
<td>289</td>
<td>154</td>
</tr>
<tr>
<td>14.020160 – European Development Fund – ACP Investment Facility reflows</td>
<td>0</td>
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<td>0</td>
<td>0</td>
</tr>
<tr>
<td>14.020170 – NDICI Global Europe – Provisioning of the common provisioning fund</td>
<td>1,595</td>
<td>6</td>
<td>1,950</td>
<td>1,391</td>
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<tr>
<td>14.020210 – Election observation missions – Human Rights and Democracy</td>
<td>50</td>
<td>9</td>
<td>27</td>
<td>16</td>
</tr>
<tr>
<td>14.020211 – Fundamental rights and freedoms – Human Rights and Democracy</td>
<td>150</td>
<td>13</td>
<td>266</td>
<td>69</td>
</tr>
<tr>
<td>14.020220 – Civil Society Organisations</td>
<td>200</td>
<td>0</td>
<td>358</td>
<td>40</td>
</tr>
<tr>
<td>14.020230 – Peace, Stability and Conflict Prevention</td>
<td>134</td>
<td>8</td>
<td>138</td>
<td>33</td>
</tr>
<tr>
<td>14.020240 – People – Global Challenges</td>
<td>1,612</td>
<td>697</td>
<td>410</td>
<td>0</td>
</tr>
<tr>
<td>14.020241 – Planet – Global Challenges</td>
<td>76</td>
<td>0</td>
<td>134</td>
<td>28</td>
</tr>
<tr>
<td>14.020242 – Prosperity – Global Challenges</td>
<td>130</td>
<td>0</td>
<td>132</td>
<td>16</td>
</tr>
<tr>
<td>14.020243 – Partnerships – Global Challenges</td>
<td>15</td>
<td>0</td>
<td>58</td>
<td>10</td>
</tr>
<tr>
<td>14.020310 – Crisis response</td>
<td>261</td>
<td>88</td>
<td>268</td>
<td>257</td>
</tr>
<tr>
<td>14.020320 – Resilience</td>
<td>530</td>
<td>0</td>
<td>634</td>
<td>192</td>
</tr>
<tr>
<td>14.020330 – Foreign policy needs</td>
<td>13</td>
<td>0</td>
<td>49</td>
<td>18</td>
</tr>
<tr>
<td>14.05 Decision on the Overseas Association including Greenland (DOAG)</td>
<td>63</td>
<td>1</td>
<td>72</td>
<td>30</td>
</tr>
</tbody>
</table>
Volume II: Annexes – March 2024 – Particip GmbH

<table>
<thead>
<tr>
<th>Budget position</th>
<th>2021 Commitments</th>
<th>2021 Payments</th>
<th>2022 Commitments</th>
<th>2022 Payments</th>
</tr>
</thead>
<tbody>
<tr>
<td>14.06 European Instrument for International Nuclear Safety Cooperation (INSC)</td>
<td>38</td>
<td>1</td>
<td>36</td>
<td>4</td>
</tr>
<tr>
<td>15.02 Instrument for Pre-Accession Assistance (IPA III)</td>
<td>1,494</td>
<td>7</td>
<td>2,397</td>
<td>435</td>
</tr>
</tbody>
</table>

Source: Annual Reports on the implementation of the European Union’s External Action Instruments (2017 to 2022).

Table 22  Externally assigned revenues for 2021-2022 in million EUR

<table>
<thead>
<tr>
<th>Instrument</th>
<th>2021</th>
<th>2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>NDICI-GE</td>
<td>2,316</td>
<td>15,613</td>
</tr>
<tr>
<td>IPA III</td>
<td>5,659</td>
<td>7,778</td>
</tr>
</tbody>
</table>

Source: Information provided by the Commission.

Breakdown by recipient countries / region

Table 23  Breakdown by recipient countries / region of Commitments by the European Commission from 2017 to 2022

<table>
<thead>
<tr>
<th>Countries</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>Part I: Developing Countries and Territories (Official Development Assistance)</td>
<td>16,445</td>
<td>15,151</td>
<td>15,432</td>
<td>15,053</td>
<td>14,617</td>
<td>19,149</td>
</tr>
<tr>
<td>Bilateral</td>
<td>15,996</td>
<td>14,946</td>
<td>15,166</td>
<td>14,815</td>
<td>91</td>
<td>19,146</td>
</tr>
<tr>
<td>Europe</td>
<td>6,887</td>
<td>2,680</td>
<td>4,606</td>
<td>3,071</td>
<td>2,923</td>
<td>4,989</td>
</tr>
<tr>
<td>Albania</td>
<td>80</td>
<td>110</td>
<td>93</td>
<td>258</td>
<td>68</td>
<td>107</td>
</tr>
<tr>
<td>Belarus</td>
<td>30</td>
<td>30</td>
<td>31</td>
<td>32</td>
<td>16</td>
<td>28</td>
</tr>
<tr>
<td>Bosnia-Herzegovina</td>
<td>77</td>
<td>91</td>
<td>127</td>
<td>136</td>
<td>84</td>
<td>58</td>
</tr>
<tr>
<td>Europe, regional</td>
<td>509</td>
<td>688</td>
<td>897</td>
<td>963</td>
<td>1,084</td>
<td>1,719</td>
</tr>
<tr>
<td>Kosovo*</td>
<td>171</td>
<td>176</td>
<td>153</td>
<td>175</td>
<td>119</td>
<td>126</td>
</tr>
<tr>
<td>Moldova</td>
<td>74</td>
<td>51</td>
<td>25</td>
<td>59</td>
<td>75</td>
<td>235</td>
</tr>
<tr>
<td>Montenegro</td>
<td>41</td>
<td>46</td>
<td>44</td>
<td>31</td>
<td>35</td>
<td>50</td>
</tr>
<tr>
<td>North Macedonia</td>
<td>82</td>
<td>102</td>
<td>114</td>
<td>133</td>
<td>93</td>
<td>95</td>
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<tr>
<td>Serbia</td>
<td>177</td>
<td>224</td>
<td>223</td>
<td>237</td>
<td>126</td>
<td>232</td>
</tr>
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<td>States Ex-Yugoslavia</td>
<td>23</td>
<td>0</td>
<td>0</td>
<td>15</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Türkiye</td>
<td>1,918</td>
<td>947</td>
<td>2,656</td>
<td>775</td>
<td>1,027</td>
<td>1,312</td>
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<td>215</td>
<td>243</td>
<td>257</td>
<td>194</td>
<td>1,025</td>
</tr>
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<td>6,213</td>
<td>5,470</td>
<td>4,126</td>
<td>4,753</td>
<td>6,324</td>
<td>6,970</td>
</tr>
<tr>
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<td>852</td>
<td>369</td>
<td>559</td>
<td>1,743</td>
<td>2,222</td>
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<td>752</td>
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<td>810</td>
<td>745</td>
<td>800</td>
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<td>55</td>
<td>110</td>
<td>7</td>
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<td>40</td>
<td>44</td>
<td>114</td>
<td>49</td>
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<td>Morocco</td>
<td>116</td>
<td>202</td>
<td>225</td>
<td>223</td>
<td>240</td>
<td>354</td>
</tr>
<tr>
<td>North of Sahara, regional</td>
<td>189</td>
<td>56</td>
<td>84</td>
<td>27</td>
<td>206</td>
<td>63</td>
</tr>
<tr>
<td>Tunisia</td>
<td>300</td>
<td>217</td>
<td>280</td>
<td>366</td>
<td>153</td>
<td>106</td>
</tr>
<tr>
<td>Africa (South of Sahara)</td>
<td>5,050</td>
<td>3,962</td>
<td>3,038</td>
<td>3,384</td>
<td>3,836</td>
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<td>20</td>
<td>90</td>
<td>12</td>
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<td>Cabo Verde</td>
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<td>66</td>
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<td>Chad</td>
<td>22</td>
<td>31</td>
<td>105</td>
<td>12</td>
<td>103</td>
<td>50</td>
</tr>
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<td>12</td>
<td>7</td>
<td>0</td>
<td>31</td>
</tr>
<tr>
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<td>2019</td>
<td>2020</td>
<td>2021</td>
<td>2022</td>
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Developing countries, unspecified 2,854 2,977 2,566 2,975 2,743 3,643

Bilateral, core contributions to NGOs and other private bodies / PPPs 9 5 5 5 1 0

Multilateral (inflows) 440 201 262 6 5 3

United Nations agency, fund or commission (UN) 103 107 103 91 5 2

FAO 0 0 0 0 2 2

OHCHR 0 4 0 0 0 0

UNEP 1 0 0 1 1 0

UNFCCC 0 0 0 3 2 0

UNRWA 102 102 103 87 0 0

Other multilateral institution 336 94 158 143 0 0

Global Alliance for Vaccines and Immunisation 50 0 90 130 0 0

Global Fund to Fight AIDS, Tuberculosis and Malaria 285 90 68 13 0 0

Other multilateral institutions 1 4 0 0 0 0

Triangular co-operation 0 0 0 0 0 0

Part II: Countries and Territories in Transition (NON-ODA eligible countries) 261 265 275 277 91 126

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Cyprus 35 34 35 37 0 0

Greenland 32 32 33 33 60 0

Russia 0 0 0 0 0 0

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Source: Annual Reports on the implementation of the European Union’s External Action Instruments (2017 to 2022).

Breakdown by sectors

Table 24  Sectoral breakdown of Commitments by the European Commission from 2017 to 2022

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<th>Sector</th>
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<th>2018</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
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<td>841</td>
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<td>696</td>
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<td>658</td>
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<td>732</td>
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<td>229</td>
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</table>
### Breakdown by aid mechanism

Table 25  
**Breakdown by aid mechanism of Commitments by the European Commission from 2017 to 2022**

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<td>883</td>
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<td>2,203</td>
<td>2,595</td>
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<td>2,816</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>16,972</strong></td>
<td><strong>15,682</strong></td>
<td><strong>15,977</strong></td>
<td><strong>15,612</strong></td>
<td><strong>15,491</strong></td>
<td><strong>20,096</strong></td>
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</tbody>
</table>

*Source: Annual Reports on the implementation of the European Union's External Action Instruments (2017 to 2022).*

### Breakdown by channels

A breakdown by channels (i.e., implementing partners or direct recipient of EU funding) is not provided by the Annual Reports on the implementation of the EU External Action Instruments.\(^{(481)}\) To get an overview of the main channels used and gain a better understanding of the budget structure under each EFI, the Evaluation Team extracted and analysed data on commitments from the EU’s ‘Statistical Dashboard.’ Due to the way things are coded in the ‘Statistical Dashboard’ and the presence of multiple coding errors, the Evaluation Team invested a considerable amount of time in recoding and checking the data. The time needed to develop a robust mapping for one instrument led the Evaluation Team to focus on only one instrument related to the current MFF – NDICI-GE – and its corresponding instruments under the previous MFF. The result of the analysis is summarised in the table below.\(^{(482)}\)

The table highlights some key specificities in early NDICI-GE programming (2021-2022) such as the impact of COVID-19 or the Syrian refugee crisis on the channels used in EU external action, but also the

\(^{(481)}\) The Annual Reports only provide an overview of the largest recipients of funding under indirect management.\(^{(482)}\) Due to the way things are coded in the ‘Statistical Dashboard’, many exceptions in the dataset make a more granular analysis difficult; moreover, a slight margin of error remains.
large share that is taken up by the EFSD+ in the EFI architecture, esp. through the provisioning of guarantees via the Common Provisioning Fund (CPF). Although not visible in the categorisation used in the Statistical Dashboard nor in the table below, the guarantees provisioned via the CPF actually cover a variety of implementing partners / channels – e.g., EU Member States Development Finance Institutions, multilateral development banks such as EBRD, the World Bank and regional development banks. Most of them were channelling various forms of EU funding under the previous MFF. Given the size of EFSD+ and the financial contributions going to the CPF, this observation is important to take into account when comparing the largest channels of EU support between the previous and current MFF. (483)

Table 26 Breakdown of NDICI-GE Commitments by channels

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</thead>
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<td>Recipient Government</td>
<td>26,57 %</td>
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<td>EU Member States agencies &amp; actors</td>
<td>11,87 %</td>
<td>7,70 %</td>
</tr>
<tr>
<td>UN agencies</td>
<td>10,47 %</td>
<td>11,16 %</td>
</tr>
<tr>
<td>Banks (incl. WB and IMF)</td>
<td>7,97 %</td>
<td>1,43 %</td>
</tr>
<tr>
<td>Trust Funds</td>
<td>7,73 %</td>
<td>0,02 %</td>
</tr>
<tr>
<td>Multilateral and intergovernmental organisations</td>
<td>6,02 %</td>
<td>1,89 %</td>
</tr>
<tr>
<td>International and local NGOs and civil society</td>
<td>5,09 %</td>
<td>4,98 %</td>
</tr>
<tr>
<td>Private sector</td>
<td>1,84 %</td>
<td>0,89 %</td>
</tr>
<tr>
<td>Donor or third country Government</td>
<td>1,07 %</td>
<td>0,71 %</td>
</tr>
<tr>
<td>Thematic instruments / pillars</td>
<td>16,90 %</td>
<td>28,12 %</td>
</tr>
<tr>
<td>International and local NGOs and civil society</td>
<td>5,99 %</td>
<td>5,88 %</td>
</tr>
<tr>
<td>UN agencies</td>
<td>3,65 %</td>
<td>2,86 %</td>
</tr>
<tr>
<td>Multilateral and intergovernmental organisations</td>
<td>1,44 %</td>
<td>11,33 % (484)</td>
</tr>
<tr>
<td>EU Member States agencies &amp; actors</td>
<td>2,14 %</td>
<td>1,52 %</td>
</tr>
<tr>
<td>Private sector</td>
<td>1,34 %</td>
<td>1,03 %</td>
</tr>
<tr>
<td>Recipient Government</td>
<td>0,52 %</td>
<td>4,70 % (485)</td>
</tr>
<tr>
<td>Other</td>
<td>1,81 %</td>
<td>0,80 %</td>
</tr>
<tr>
<td>EFSD+, ELM, MFA</td>
<td>1,22 %</td>
<td>26,85 %</td>
</tr>
<tr>
<td>Common Provisioning Fund (CPF)</td>
<td>0,00 %</td>
<td>26,85 %</td>
</tr>
<tr>
<td>Other</td>
<td>1,22 %</td>
<td>0,00 %</td>
</tr>
<tr>
<td>Other</td>
<td>3,26 %</td>
<td>2,01 %</td>
</tr>
</tbody>
</table>

Source: Authors’ own analysis of EU Statistical dashboard data (based on extractions of sheet 23 in March 2023).

Overview of Trust Funds

Table 27 Overview of Commitments and Payments through Trust Funds (2014-2020)

<table>
<thead>
<tr>
<th>Trust Funds</th>
<th>Commitments</th>
<th>Payments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trust Fund Africa*</td>
<td>5,186</td>
<td>3,091</td>
</tr>
<tr>
<td>Trust Fund Bêkou</td>
<td>314</td>
<td>197</td>
</tr>
<tr>
<td>Trust Fund Colombia</td>
<td>123</td>
<td>66</td>
</tr>
<tr>
<td>Trust Fund Madad</td>
<td>2,282</td>
<td>1,515</td>
</tr>
<tr>
<td>Total</td>
<td>7,905</td>
<td>4,869</td>
</tr>
</tbody>
</table>

Source: Annual Reports on the implementation of the European Union’s External Action Instruments (2017 to 2022).

(483) In addition, compared to grant contributions, EU funding provided in the form of guarantees present various specificities. In particular, the EU financial contributions going to the CPF correspond to ‘provisioning’ for specific guarantees, not to the actual budget of the investment projects supported through these guarantees. Moreover, unlike other forms of support, it is difficult to make a distinction between commitments and spending since allocations to guarantees are eventually used only in cases of default. Some observers also argue that, from an economic point of view, funding provided in the form of guarantees cannot be considered as equivalent to a grant contribution in quantitative terms.

(484) More than 90 % of this sharp increase relate to the EU’s response to the COVID-19 pandemic channelled through The Global Fund to Fight AIDS, Tuberculosis and Malaria and the GAVI alliance.

(485) More than 80 % of this sharp increase relate to funding under the RRP going to Türkiye in support of Syrian refugees.
Annex 7 – Presentation of the Evaluation Team

The Evaluation Team consists of a core team and several individual block teams. In some cases, core team members have also lead or supported blocks. In total, the following persons have contributed to the evaluation:

Core Team
Landis MacKellar (TL), Camille Massey, Volker Hauck, Jean Bossuyt, Alexei Jones, Tino Smaïl, Sarah Bellot Le Hellidu, Michael Lieckefett

Block leads
Paul Georis, Charlotte Vaillant, Jörn Dosch, Thomas Keck

With the support of
Amandine Sabourin, Ana-Maria Moreno Mendieta, Andrew Sherriff, Anthony Land, Cecilia D’Alessandro, Fatima Laanouni, Federico Bilder, Fernanda Faria, Isabell Breunig, Judi Clarke, Karim Karaki, Katarina Jurlina, Lida Rodriguez, Louise Escudier, Maëlle Salzinger, Mariella Di Ciommo, Nino Khursidze, Pauline Veron, Ratka Sekulovic, Reza Lahidji, Sara Gianesello, Sophie Desmidt, Stefan Lang, Tamara Ulla
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