



CONCORD

European Confederation of NGOs working on sustainable development and international cooperation

WHO HOLDS THE LION'S SHARE?

A closer look at Global Europe Funds for CSOs

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TABLE OF CONTENTS

EXECUTIVE SUMMARY	4
1. INTRODUCTION	6
2. METHODOLOGY	7
3. FINDINGS	8
3.1 Overall distribution of management modes and implementing partners	8
3.2 Entrusting others - support for CSOs under indirect management	11
3.3 Support for CSOs under direct management	15
3.3.1 Meeting the eligibility criteria	16
3.3.2 Beyond access to direct funding: Other barriers	19
3.3.3 Changing attitudes and approaches	19
3.3.4 Support for CSOs in limited and endangered civic spaces	20
3.4 Conclusions	21
4. RECOMMENDATIONS	23
5. ANNEXES	33
5.1. Methodology	33
5.1.1 Review of the NDICI-Global Europe action plans and measures	33
5.1.2 Semi-structured interviews	35
5.1.3 Limitations and outlook	36
5.2 Country list for the document review	37
5.3 Note on the definition of CSOs	38
5.4 Management modes	39
5.5 Grant aid modalities most likely to be used by CSOs	39
5.6 Indicator list	41
5.7 Further data sources	43
5.8 Charts and graphs	44
5.9 List of regional programmes included in the study offering funding opportunities for CSOs through calls for proposals (in €M)	55
6. BIBLIOGRAPHY AND REFERENCES	58
ACKNOWLEDGEMENTS	59

ACRONYMS

AAP	Annual Action Plan
CSO	Civil Society Organisations
EC	European Commission
EU	European Union
EUD	Delegation of the European Union
DG INTPA	Directorate-General for International Partnerships
DG NEAR	Directorate-General for European Neighbourhood Policy and Enlargement Negotiations
FFSD	Financing and Funding for Sustainable Development
GIZ	Gesellschaft für Int. Zusammenarbeit - German Agency for International Cooperation
HRD	Human Rights and Democracy
INGO	International Non-Governmental Organisation
FSTP	Financial Support to Third Parties
(M)AAP	(Multi)Annual Action Plan
MFF	Multiannual Financial Framework
MIP	Multiannual Indicative Programme
MTR	Mid-term review
NDICI-Global Europe	Neighbourhood, Development and International Cooperation Instrument - Global Europe
NGO	Non-Governmental Organisation
OPSYS	Operational System / information system used by the EC for External Actions
SDGs	Sustainable Development Goals
SIDA	Swedish International Development Cooperation Agency
TEI	Team Europe Initiative
UN	United Nations
WRO	Women's Rights Organisation

EXECUTIVE SUMMARY

The role of Civil Society Organisations in implementing development cooperation programmes and providing funding for CSOs is a key aspect of EU international partnerships. Likewise, for many CSOs the EU partnership is a vital source of income for their programmes. In recent years, the changes in EU international cooperation programmes have impacted the distribution and diversity of EU funding for CSOs. As the findings of this study suggest, the partnership practices and funding mechanisms under the EU Neighbourhood, Development and International Cooperation Instrument - Global Europe (NDICI-Global Europe) no longer allow CSOs to effectively contribute to the implementation of all EU international cooperation programmes and do not enable CSOs to maximise their contribution to sustainable development.

The current regulatory framework and partnership practices hinder equal and fair access to EU programmes by the full range of civil society actors. The study shows that this is linked to the reduced capacity of the EU entities responsible for the management of international cooperation and the widespread use of the 'indirect management' mode, whereby large amounts of the NDICI-Global Europe budget are delegated to EU Member State international cooperation institutions or agencies, and international organisations. Our analysis of action plans and measures for the NDICI - Global Europe geographic programmes suggests that almost 60% of funding is delegated to 'pillar-assessed entities'¹, and therefore outsourced to other international cooperation organisations.

We recognise that CSOs have privileged access to EU thematic programmes such as 'Civil Society Organisations' and 'Human Rights and Democracy' to encourage contributions to influencing policy, advocacy and defence of human rights around the world. However, these programmes contain modest resources representing around 3% of the overall NDICI-Global Europe budget and do

not cover the spectrum of CSO expertise and implementation capacity. CSOs are not only policy advocates, but also major implementing partners, who play a role in service provision, especially where the duty bearers do not fulfil this role adequately. CSOs are also valued for their vital role in bringing the voices of those suffering from poverty and inequality into development processes and thus in helping to meet the 2030 Agenda commitment to leave no one behind. Recognising that CSOs play a wide range of important roles in international cooperation, which contribute to the achievement of the Sustainable Development Goals (SDGs), it follows that they should be appropriately supported throughout the whole NDICI-Global Europe programme.

It is encouraging that the EU acknowledges CSOs as partners in dialogue and advocacy. However, for this partnership to be mutually beneficial, accountable and transparent, the EU must ensure that effective and standardised tools, such as regular consultation and dialogues, are given effect operationally and through a diversity of CSO funding mechanisms under the NDICI-Global Europe budget. These funding mechanisms must be adapted to the new geographic programmes, recognise the diversity of CSO actors and cover new initiatives such as the Team Europe approach and Global Gateway. They must also reflect the reduced administrative capacity of DG International Partnerships (DG INTPA), DG Neighbourhood and Enlargement Negotiations (DG NEAR) and the EU Delegations.

In light of the Mid-Term Review of the NDICI-Global Europe which will be completed in 2024, this study offers the following recommendations to improve the diversity and transparency of funding for CSOs under the instrument and to support the EU in achieving its international cooperation commitments, for the remainder of the implementation period and beyond:

- 1. Allocate earmarked budgets for CSO funding across all NDICI-Global Europe geographic and thematic programmes.**
- 2. Strengthen accessibility and inclusiveness of funding under indirect management.**

¹ Pillar-assessed entities encompass a range of institutions that have been assessed and certified for their financial capacities. EC Terms of References for pillar assessments.

3. Allocate sufficient EUD (EU Delegation) capacities and resources to implement the 'geographisation' principle.
4. Ensure more regular and inclusive consultation processes and greater feedback on programmatic decisions.
5. Provide a long-term cooperation framework for diverse CSOs.
6. Increase core funding for CSOs.
7. Improve access to calls for proposal for CSOs.
8. Augment direct, simplified financial support for local CSOs and support for a broader civil society in partner countries.
9. Facilitate tracking of funding by programme, management mode and type of entity on the Financial Transparency System and in the Commission's annual report on external financing instruments.
10. Ensure the EU Financial Regulation requires accessible information on recipients of EU funds and ensure use of the indirect management mode is based on cost effectiveness.
11. Ensure transparency and availability of information of action plans and measures.



1. INTRODUCTION

Fostering civil society has been promoted as a cornerstone of the European Union's efforts to reach the SDGs² and the EU has committed to supporting CSOs through its external action instruments and programmes since 2012³. For its 2021-2027 budget cycle, the EU introduced a new single financial instrument for international cooperation: "The Neighbourhood, Development and International Cooperation Instrument - Global Europe (NDICI-Global Europe)". NDICI-Global Europe has an overall budget of €79.5 billion and it has been set up with the specific commitment to "support civil society organisations"⁴. The NDICI-Global Europe Regulation also states that "civil society organisations should be duly consulted and have timely access to relevant information allowing them to be adequately involved and play a meaningful role during the design, implementation and associated monitoring processes of programmes"⁵. However, almost three years after the adoption of the NDICI-Global Europe, many CSOs question the **effective involvement of civil society stakeholders in NDICI-Global Europe implementation**.

There is currently very little available data to analyse how resources are allocated through the different components of the NDICI-Global Europe (geographic pillar: €60.4 billion, thematic pillar: €6.4 billion, rapid response pillar: €3.2 billion, flexibility cushion: €9.5 billion). Under

the thematic component, €1.5 billion have been earmarked for a Multiannual Indicative programme (MIP) aimed specifically at strengthening CSOs⁶. This global thematic MIP sets out the EU's civil society strategy which is to "support their role [of CSOs] as independent actors of good governance and development (...) and to efficiently include them as key partners in designing, implementing, and monitoring European policies, programmes and projects"⁷. It also states that "**the majority of the support to CSOs is foreseen to continue to be provided under the geographic programmes**, through targeted support to strengthen CSOs and by mainstreaming civil society in country areas of cooperation to attain set development goals"⁸.

However, in the absence of sufficiently detailed and well-structured data, it has been difficult to assess to what extent the EU's commitment to CSO support has been translated into **geographic funding decisions**. CONCORD members consider that "in recent years, the changes in EU international cooperation programmes have reduced the distribution and diversity of EU funding for CSOs" and "partnership practices and funding mechanisms under NDICI-Global Europe no longer support long-term sustainability and fail to encompass the diversity of the civil society sector"⁹.

In light of the **ongoing mid-term review of the NDICI-Global Europe**, which should be finalised in 2024, the present study aims to provide an evidence-based analysis of EU funding to CSOs

- 2 EU (2017), The New European Consensus on Development, https://international-partnerships.ec.europa.eu/system/files/2019-09/european-consensus-on-development-final-20170626_en.pdf.
- 3 EU (2012), The roots of democracy and sustainable development: Europe's engagement with Civil Society in external relations, COM/2012/0492 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52012D0492>.
- 4 EU (2021), Regulation 2021/947 (9 June 2021) establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R0947>.
- 5 Article 46 also provides the EU's definition of civil society organisations as "a wide range of actors with multiple roles and mandates which includes all non-State, not-for-profit independent and non-violent structures, through which people organise the pursuit of shared objectives and ideals, whether political, cultural, religious, environmental, social or economic (...) operating from local, national, regional and international levels"; EU (2021), Regulation 2021/947 (9 June 2021) establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R0947>.
- 6 European Commission, International partnerships, Civil society https://international-partnerships.ec.europa.eu/policies/peace-and-governance/civil-society_en.
- 7 EU (2021), Thematic Programme for Civil Society Organisations Multiannual Indicative Programme 2021-2027, https://international-partnerships.ec.europa.eu/system/files/2022-01/mip-2021-c2021-9158-civil-society-organisations-annex_en.pdf, p. 5.
- 8 Ibid, p. 5-6.
- 9 Funding for civil society organisations (March 2023), CONCORD position paper, <https://concordeurope.org/resource/funding-for-civil-society-organisations-in-the-neighbourhood-development-and-international-cooperation-instrument-global-europe/>.

under the NDICI-Global Europe geographic component. More specifically, the study aims to:

- (1)** assess EU funding going to and through CSOs;
- (2)** critically examine how the EU's political discourse matches NDICI-Global Europe funding decisions, and
- (3)** explore potential adaptations of the support and funding modalities to reach all types of CSOs.

The analysis aims therefore to inform, stimulate and support CONCORD's discussions with relevant EU institutions and EU Member States about the role of CSOs, and the barriers they face in the implementation of the NDICI-Global Europe. It will also contribute to discussions about and potential adaptations of the CSO funding mechanisms.

2. METHODOLOGY

The present analysis of NDICI-Global Europe funding for CSOs used a mixed methodology, focusing mainly on quantitative data and adding qualitative data for complementary insights. The study was designed and conducted between April and June 2023, over a period of 10 weeks.

The data collection and analysis were based on two main sources:

- (1)** publicly available annual and multiannual action plans and measures with their annexes;
- (2)** semi-structured interviews with EUD and CSO representatives in five countries, as well as close consultation with CONCORD members.

A detailed analysis of the methodology can be found in Annex 5.1.



3. FINDINGS

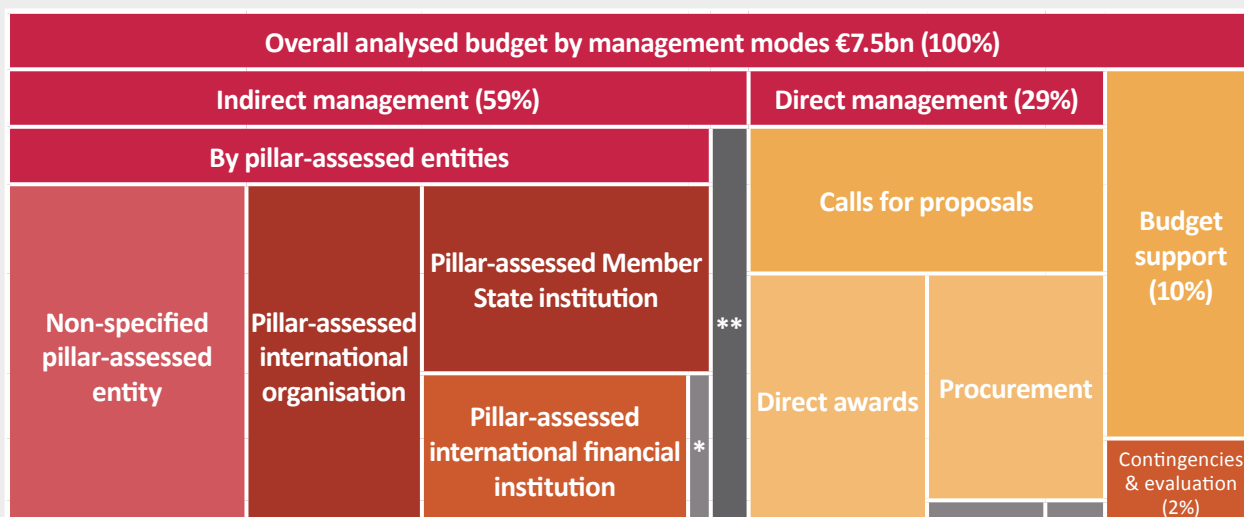
This chapter provides an analysis of EU NDICI-Global Europe funding for CSOs, considering both progressive shifts and remaining challenges. It presents the major findings of the funding data analysis, the choice of management modes and funding modalities, as well as further insights into the quality of CSO support.

3.1 Overall distribution of management modes and implementing partners

Based on the sample of 278 geographic action plans and measures under NDICI-Global Europe, the analysis shows that:

- the majority (59%) of the analysed geographic funding is spent through indirect management;¹⁰
- less than one third of funding is spent through direct management¹¹, excluding budget support.

Figure 1: Overview of the budget analysed in €bn by management modes



* pillar-assessed partner governments | **other

Note No.1: The tree map chart shows the hierarchical data by indicating the relative share of different management modes and funding modalities. At the top level, it distinguishes between four different categories of management modes and then gives a breakdown by financing modality. Each main category is represented by a large rectangle, the size of which indicates the relative importance or scale of the specific management mode. Percentages are indicated for four categories of management modes: Indirect management, Direct management, Budget support, Contingencies & evaluation costs.

Note No.2: Pillar-assessed entities encompass a range of institutions that have been assessed and certified for their financial capacities. While action plans and measures sometimes specify the type of implementing partner (international organisation, Member State institution, etc.), many only refer to the non-specific term “pillar-assessed entity”.

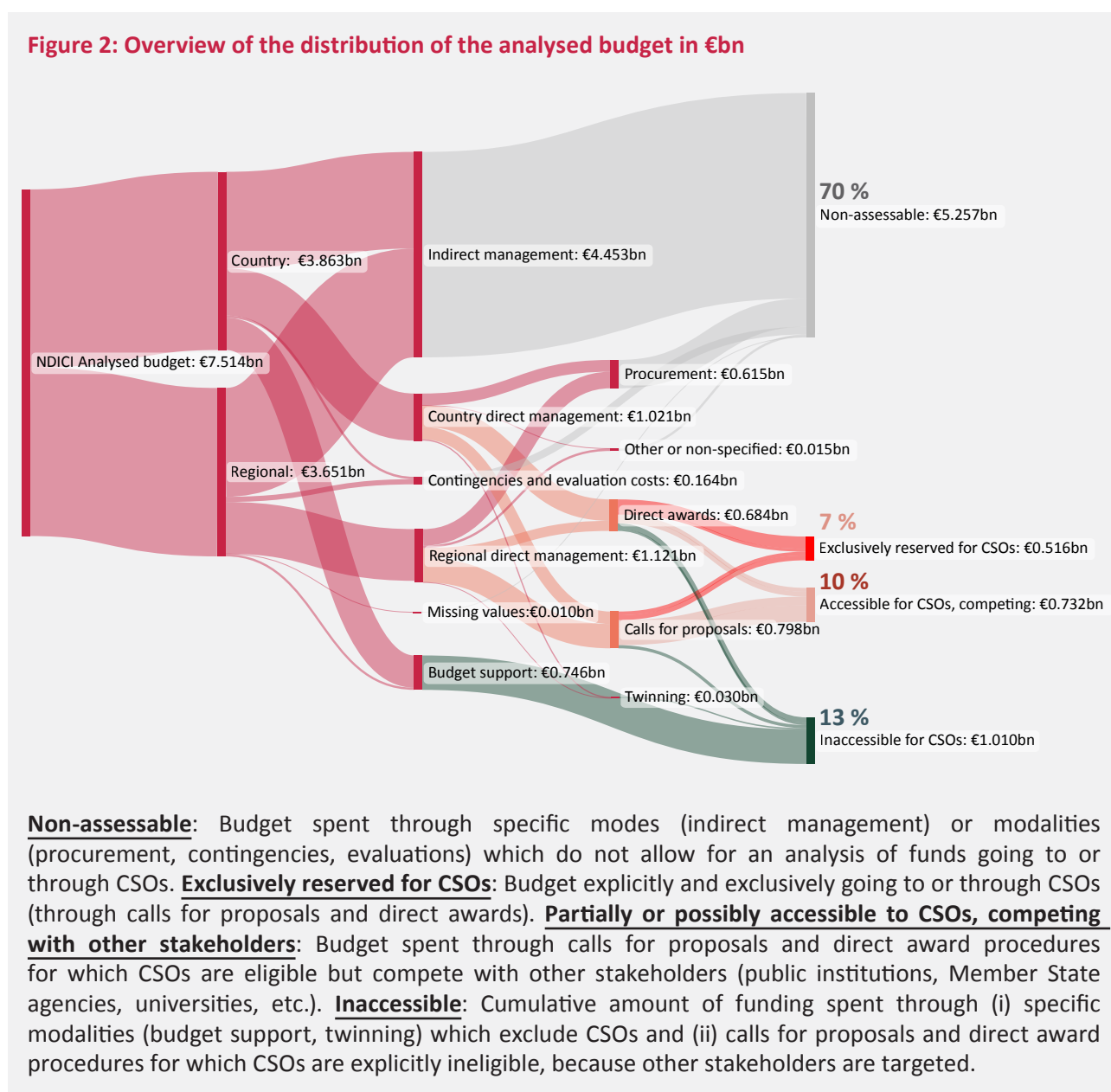
¹⁰ Note: **indirect management** is the funding managed by partner organisations or other authorities inside or outside the EU; **direct management** is EU funding managed directly by the European Commission, https://commission.europa.eu/funding-tenders/find-funding/funding-management-mode_en#direct-management.

¹¹ *ibid.*

Figure 2 below gives the budget flows analysed. It distinguishes –from left to right – between geographic scopes (country vs regional), the two major management modes and funding modalities, and indicates the percentage values of the findings on the righthand side. The data must be interpreted with caution, given the non-representativeness of the sample and the high amount of non-assessable data, which is particularly significant in regional action plans and measures. For more details, please see see Figures 11 & 12 in Annex 5.8.2.

- The share of indirect management is markedly higher:
- When an action plan or measure is part of a TEI (country-level: 58%, regional: 84%, see Annex 5.8.5, 5.8.6).
 - In Special Measures¹² (country-level: 66%, regional: 74%, see Annex 5.8.8).
 - In closed civic spaces (country-level: 63%, regional: not applicable, see Annex 5.8.12).
 - In crisis-affected contexts (country-level: 60%, regional: not applicable, see Annex 5.8.13).
 - In specific sectors (see Annex 5.8.9), such as
 - At country-level: Disaster Prevention & Preparedness (99%) and Water Supply & Sanitation (88%);

Figure 2: Overview of the distribution of the analysed budget in €bn



12 See an explanation of different action plan and measure types under 2.1 Review of NDICI-Global Europe action plans and measures and Annex 6.1.

- At regional level: Population Policies and Reproductive Health (100%) and Energy (88%);
- In the Government & Civil Society sector, the share of indirect management is slightly lower at country-level (50%) and much higher at regional level (72%).

A **similar pattern** is revealed when comparing indirect and direct management modalities in contexts marked by low to high risks of crisis, based on the EC INFORM Risk indicator¹⁴ which assesses the risk level for humanitarian crises and disasters. In the budget support management mode, the pattern is slightly reversed.

Comparing the budget distribution by management modes and the degree of openness of civic space, based on the CIVICUS civic space rating (from 1-open civic spaces to 5-closed civic spaces), reveals **interesting patterns** - which must nonetheless be treated with some caution due to the non-representativeness of the data sample: **In obstructed, repressed or closed civic spaces¹³, indirect management is the preferred mode** (respectively 55%, 53% and 63% of the overall country-level budget).

However outside of these specific contexts, the choice of indirect management seems directly linked to the lack of EU institutional capacity to manage a large number of grants. For instance, an interview with an EUD representative highlighted that EUDs' resources are limited, which forces them to delegate or find solutions to limit the number of directly managed grants and the large number of proposals received when opening a call.

Figure 3: Country-level budget distribution in €M by management modes and civic space ranking

CIVICUS civic space rating <i>rounded figures</i>		Indirect management	Direct management	Budget support	Contingency and evaluation budget	Total
↓	1 - open	0%	15%	85%	1%	100%
	2 - narrow	28%	32%	39%	1%	100%
	3 - obstructed	55%	23%	21%	1%	100%
	4 - repressed	53%	29%	17%	2%	100%
	5 - closed	63%	30%	6%	1%	100%

Note: The table focuses on the analysed budget at country-level (in total: €3863M) and compares budget distribution according to the CIVICUS civic space ratings.

Figure 4: Country-level budget distribution in €M by management modes and crisis risk levels

EC INFORM Risk level <i>rounded figures</i>		Indirect management	Direct management	Budget support	Contingency and evaluation budget	Total
↓	1 - Very low	NA	NA	NA	NA	100%
	2 - Low	33%	39%	27%	1%	100%
	3 - Medium	51%	20%	27%	1%	100%
	4 - High	54%	25%	20%	2%	100%
	5 - Very high	60%	31%	9%	1%	100%

Note: The table focuses on the analysed budget at country-level (in total: €3863M) and compares budget distribution according to the EC INFORM Risk Level index.

¹³ Civicus Civic Space Monitor (April 2023): <https://monitor.civicus.org/>.

¹⁴ INFORM Risk Index 2023 (April 2023), <https://drmkc.jrc.ec.europa.eu/inform-index/INFORM-Risk/Results-and-data/moduleId/1782/id/453/controller/Admin/action/Results>.

3.2 Entrusting others - support for CSOs under indirect management

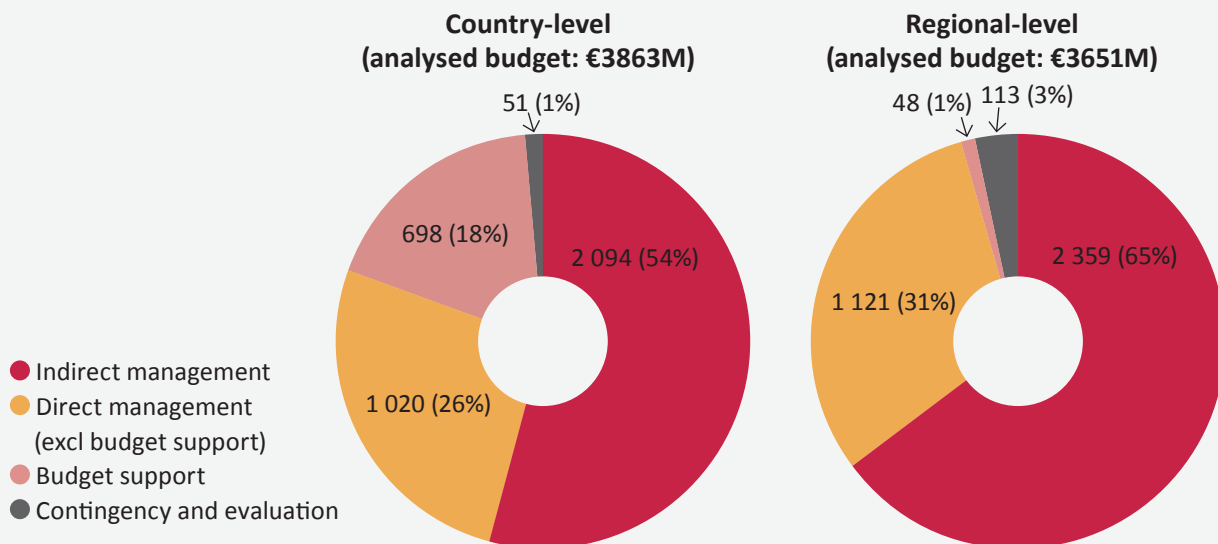
As stipulated in the NDICI-Global Europe Regulation, the EU can entrust implementing partners with budget implementation tasks. As seen above, indirect management is the leading management mode deployed, both in country-level (54%) and regional action plans and measures budgets (65%).

EU funds are mostly **managed by privileged implementing partners of the EU, the “pillar-assessed entities”**. The term “pillar-assessed entities” encompasses public law bodies and private law bodies with a public mission whose financial management capacities have been certified¹⁵. They include international organisations, mainly UN agencies and Member State development cooperation institutions or agencies¹⁶.

Even though eligible partners must undergo a “Pillar Assessment” before approval to manage EU funds, **the funding choices of the pillar-assessed entities, are largely invisible, and it is therefore impossible to assess to what extent they support CSOs**. The EU gives very few instructions to its “pillar-assessed entities” as to how they should support and fund CSOs. For instance, the study finds that only 11% of country-level action plans and measures using the indirect management mode explicitly mention sub-granting to CSOs. At regional level, only 6% mention sub-granting to CSOs. The EU’s preferred management mode therefore remains opaque when assessing support to CSOs. This raises questions about compliance with the NDICI-Global Europe Regulation and the EU’s own commitments to inclusive partnership, transparency and mutual accountability¹⁷.

As Figure 6 indicates, Member State international cooperation institutions and international organisations are important partners for the implementation of the geographic component of NDICI-Global Europe.

Figure 5: Budget distribution in €M by management modes



Note: The charts above show the distribution of the analysed budget at country-level (left) and regional level (right).

15 DG INTPA Terms of reference for expenditure verifications (June 2022), https://international-partnerships.ec.europa.eu/policies/audit-and-control_en.

16 For a more detailed analysis, see Annex 5.4.

17 Extract from NDICI-Global Europe regulation Article 8.6: “In line with the principle of inclusive partnership and transparency, where appropriate, the Commission shall ensure that relevant stakeholders of partner countries, including civil society organisations and local authorities, are duly consulted and have timely access to relevant information allowing them to be adequately involved and play a meaningful role in the design, implementation and associated monitoring processes of programmes.”

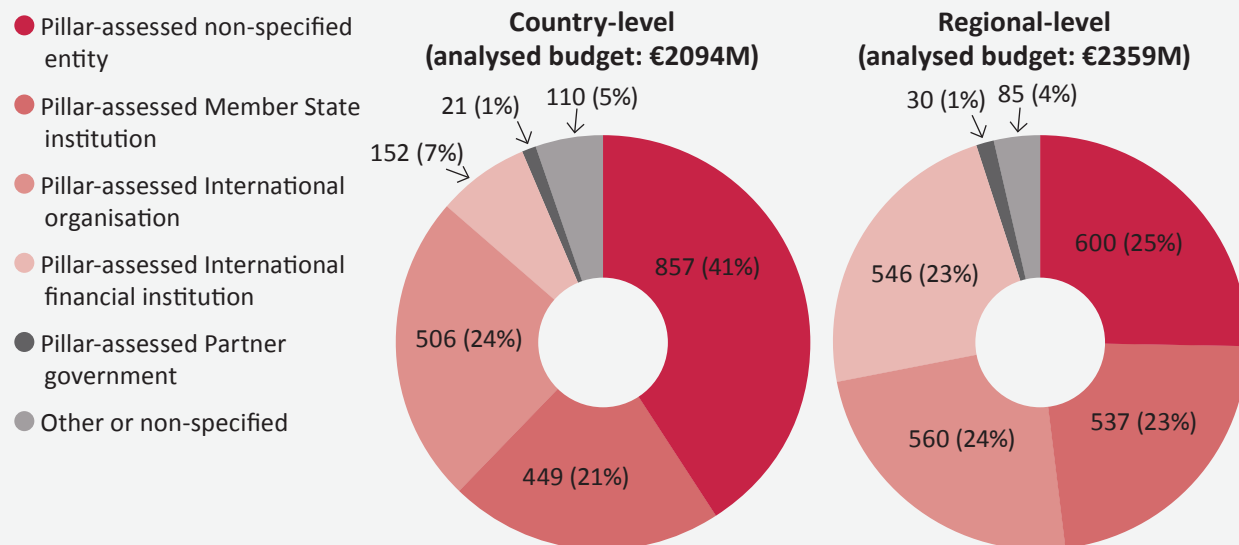
According to this study:

- International organisations are entrusted with at least 24% of the indirectly managed budget, both in country-level and regional action plans and measures.
- Member State international cooperation institutions and agencies are entrusted with at least 20% of the indirectly managed funding.
- At regional level, international financial institutions, such as the World Bank, are equally important implementing partners, entrusted with 23% of the analysed regional indirectly managed budget.
- Only some 1% of the analysed indirectly managed geographic budget is implemented through partner country governments.
- These **figures must be interpreted carefully given the widespread use of the category of non-specified “pillar-assessed entities”**. As a result of this lack of precision, it is impossible to (a) determine the exact distribution of

indirect management responsibilities among the various pillar-assessed entities and (b) to know whether or not international organisations and Member State international cooperation institutions and agencies are in fact entrusted with even higher shares of the overall indirectly managed budget.

Moreover, the analysis shows that it is difficult to understand what place is reserved for CSOs under indirect management. While some CSOs may theoretically become “pillar-assessed entities” as some can be “private law bodies with a public mission” according to the definition provided in the EU Financial Regulation¹⁸, the current restrictive definition under the Financial Regulation and practices excludes most of them. The 2021 Annual activity reports¹⁹ of DG INTPA and DG NEAR show that, in 2021, **no single CSO was entrusted with indirect management of EU funds**.

Figure 6: Indirect management budget distribution in €M by implementing partners



Note 1: The two charts above show the distribution of the analysed budget which is indirectly managed, at country-level (left) and regional level (right), by different implementing partners.

Note 2: Pillar-assessed entities encompass a range of institutions that have been assessed and certified for their financial capacities. While action plans and measures sometimes specify the type of implementing partner (international organisation, Member State international cooperation institution, etc.), many refer to the non-specific term “pillar-assessed entity”.

¹⁸ Article 62 REGULATION (EU, Euratom) 2018/1046 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 July 2018, Article 62 <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX%3A32018R1046>.

¹⁹ EC/DG INTPA (2021), Annexes to the Annual Activity Report, https://commission.europa.eu/system/files/2022-05/annual-activity-report-2021-international-partnerships-annexes_en.pdf, 550ff and EC/DG NEAR (2021), Annexes to the Annual Activity Report, https://commission.europa.eu/system/files/2022-05/annual-activity-report-2021-neighbourhood-and-enlargement-negotiations-annexes_en.pdf, 267ff.

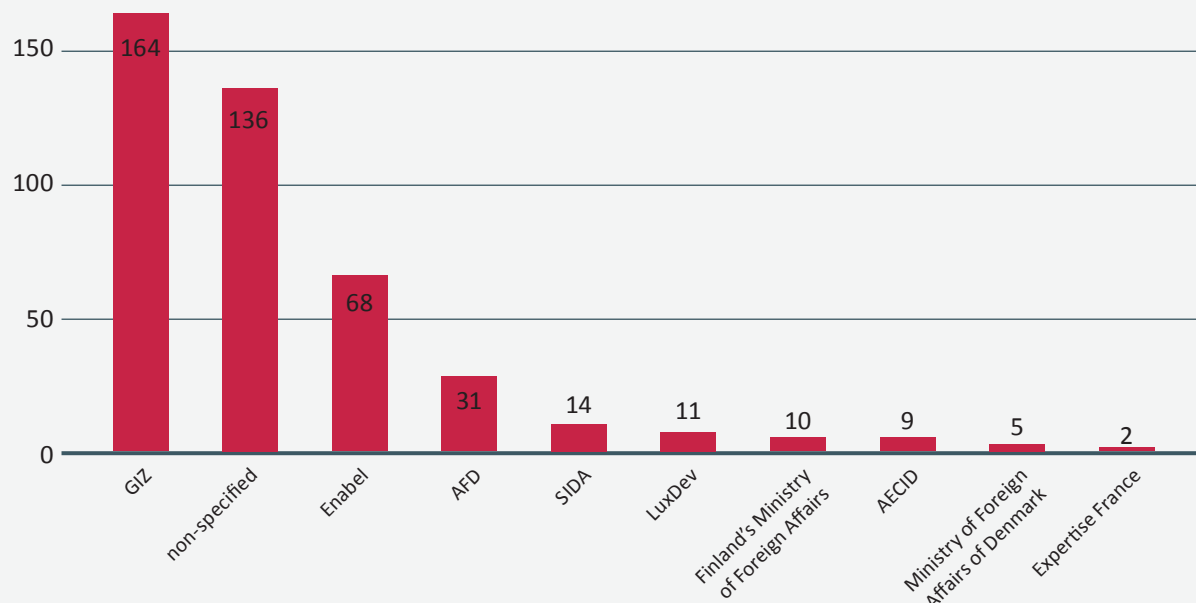
Among Member State international cooperation agencies selected for indirect management, in terms of budget share, the German international cooperation agency (GIZ) is the EU's most important Member State implementing partner for the analysed budget, entrusted with at least 164 million euro under indirect management (37% of the overall country-level Member State-managed analysed budget, see Figure 7 below).

Despite the absence of CSOs under indirect management, it is possible that they may benefit from sub-granting. However, very little data is available. As it has not been possible to estimate the approximate amount of sub-granting to CSOs channelled through the EU's primary implementing partners, the analysis of funding for civil society in the action plans and measures, using indirect management relies on **two alternative indicators of CSO support under indirect management:**

1. Based on the country-level sample, the analysis shows that 30 out of 130 action plans and measures (23%) mention selection criteria favouring **expertise or experience in working with CSOs** for the choice of the implementing partner (regional: 3%).

- For example, the *Action Document for Strengthening the Rule of Law and the Fight Against Corruption in Ghana (2022)*, indicates that a “pillar-assessed entity” would be selected by considering, among other criteria, the entity’s “expertise in providing technical assistance to state institutions and civil society and the media; experience and capacity to award, monitor and evaluate, and financially manage grants to civil society organisations (including media organisations)” and its “experience in overseeing and supporting public education, public awareness, and advocacy campaigns by civil society and the media”.
- According to the *Action Document for EU-Cambodia Partnership for Public Financial Management Reform (Stage IV)* the allocation of €3.5M to the Swedish International Development Cooperation Agency (SIDA) under indirect management was justified by SIDA’s “proved [sic] ability to support Civil Society Organisations (CSOs) engaging in good governance, anti-corruption strategies, promotion of transparency and public participation in policy-making” as well as its “specific mandate to focus its support on

Figure 7: Indirect management budget distribution by Member State implementing partners, in €M, country-level



Note: The chart shows the distribution of the analysed country-level budget in €M indirectly managed by Member State international cooperation institutions or agencies.

human rights, rule of law and democracy and to work through Civil Society Organisations (CSOs)” (p. 26-27).

2. At country-level, 14 out of 129 (11%) action plans and measures using the indirect management mode explicitly mention **sub-granting to CSOs**. At regional level, only five out of 80 (6%) mention sub-granting to CSOs. **However, it is impossible to identify specific sub-granting amounts, except from one specific example:**

- The *Action Document for Good Governance and Gender Equality linked to the annual action plan in favour of the Republic of Namibia (2022)* is a rare example of a programme managed by UNFPA and UNDP which clearly indicates sub-granting to CSOs (€0.75M and €0.05M or €0.8M in total). Indeed, the document states that “grants to Civil Society Organisations (CSOs) will be of utmost importance for the achievement of the defined results, most notably in results area 3.3, for which CSOs, including women’s organisations, will be playing a pivotal role.” (p. 4)²⁰.

When discussing this topic with EUD representatives, their take on CSO support through indirect management seems to be mixed:

- One interviewee described the **indirect management mode as part of a specific strategy for CSO support**. Having more than one implementing partner for one programme “goes against all good practices. However, to avoid putting CSOs at risk, the project was divided”, ensuring that one implementing partner works with the government, while another implementing partner works with civil society and communities.
- Conversely, another interviewee described **a loss of control when relying heavily on indirect management**: “We delegate the funds to the UN, now we’re in their hands.”

Geographisation and civil society consultations: a mixed result

Several EUD representatives interviewed emphasised that several mechanisms and activities had been put in place during the programming phase of NDICI-Global Europe to gather views on what would be its priorities. The growing importance of civil society consultations may be linked to the geographisation of NDICI-Global Europe²¹. According to one interviewee, this is a positive trend for CSOs because “there used to be a lack of access to EU grants when the processes were centralised and managed from Brussels (...) now the processes have been decentralised, and funds are more accessible depending on EUDs, should they advertise broadly their calls for proposals.” (CSO representative).

The involvement of CSOs in the programming process is often referred to in the country-level action plans and measures. For example, the *Action Document for “Supporting progress in key areas of public administration reform in Lebanon” (2022)* mentions that “Consultations with civil society actors were organised and their recommendations are duly reflected in the design of the action.” (p.12)²². In some countries, EUDs have committed to pursuing CSO consultations during the implementation phase. For example, in Libya, the EU envisages “broad consultations with CSOs” and a “participatory approach (...) for the key phases of the action, also triggering a bottom-up decision making/consultation process.” (*Special Action Document for Support to climate change strategy and environment protection in Libya (2022)*, p. 15)²³. Emphasising the importance of such processes, two EUD representatives mentioned **challenges identifying which CSOs to invite for consultations and ensuring balanced**

20 Available at: https://international-partnerships.ec.europa.eu/action-plans_en?f%5B0%5D=countries_countries_multiple_%3Ahttp%3A//publications.europa.eu/resource/authority/country/NAM

21 “Geographisation means that most funds are disbursed in at the national and regional level and that EUDs and Member States in partner countries have a greater role in decision making over priorities and allocations in a given country.”, EU (2021), Global Challenges’ Thematic programme Multi-annual indicative programme 2021-2027, https://international-partnerships.ec.europa.eu/system/files/2022-01/mip-2021-c2021-9157-global-challenges-annex_en.pdf

22 Available at: https://neighbourhood-enlargement.ec.europa.eu/commission-implementing-decision-7122022-financing-annual-action-plan-favour-lebanon-2022_en

23 Available at: https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-11/C_2022_8264_F1_ANNEX_EN_V1_P1_2325250.PDF

representation. According to an EUD official, reaching out to CSOs located in marginalised regions and at the grassroots level might be challenging due to their lack of visibility.

During interviews, CSO and Women's Rights Organisation (WRO) representatives generally expressed appreciation for the **consultation processes**. On the one hand, CSOs found that the programme design and choice of programme components were participatory and increased the ownership of civil society. They felt that the consultation and participation of CSOs, particularly those representing indigenous peoples, recognised the importance of actively including these groups, since they had unique insights and perspectives that were valuable in the planning phase. On the other hand, interviews with several CSO representatives also showed **the short-comings of consultations**; they greatly regretted that organisations involved in consultations were rarely informed about the outcomes of the discussions. *"We have been asked to make recommendations, but we do not see the implementation of these recommendations on the ground."* (WRO representative).

Indeed, it is **difficult to measure the impact of CSO consultations on the actual programming and funding** decisions. For instance, a representative of a WRO partner referred to a consultation focusing on internally displaced women and girls, during which CSOs contributed to the formulation of an action plan. "This action plan was collectively appreciated, including by the EU, which mentioned further funding. To date, I have not heard of direct support for WROs working with internally displaced women. If this direct support has materialised, information should at least be passed on to the organisations that have been consulted and they should be offered to form a consortium" (WRO representative). In another example, in 2021, the EUD in another country conducted a one-week consultation with civil society to identify priority areas. During the consultations, CSOs expressed their concern about competing with international NGOs. As a result, the criterion of having at least one local co-applicant in the implementation process was integrated at both country level and in the regional programme.

To conclude:

- The analysis shows that international organisations and EU Member States international cooperation institutions or agencies have privileged access to EU funds under the indirect management mode, while the EU does not currently offer comparable advantage to CSOs.
- Precise data on CSO funding (amounts or modalities) under indirect management is currently insufficient and unexploitable. It is therefore not possible to assess the extent to which international organisations, Member States international cooperation institutions or agencies, and other partners entrusted with EU funds are sub-granting to CSOs.
- While efforts have been made by the EU to adopt a more collaborative approach to involve CSOs in programming and implementation under the NDICI-Global Europe, civil society stakeholders as well as EU officials interviewed recognise the significant challenges that persist in consultation mechanisms.

3.3 Support for CSOs under direct management

Under **direct management** the EU implements actions through procurement, budget support to partner governments, as well as through grants which are allocated either as direct grants or through calls for proposals. **CSOs can access support through two main modalities: calls for proposals and direct grants.** Through calls for proposals, CSOs are invited to participate in a competitive bidding process, while beneficiaries of direct awards are selected, without a call for proposals, on the basis of EUD deliberations (see Annex 5.4).

As Figure 8 shows, at country-level, **direct awards make up almost half of the directly managed funding (46%)**. This can be explained by the relatively large amount of direct grants: while the median direct award budget at country-level is €7.5M, the median budget of calls for proposals is about half of this figure at €3.93M.

Direct awards are primarily used in crisis contexts. The EU Regulatory Framework only

permits the use of this procedure in precise predefined cases, such as crisis-affected contexts and emergencies identified by the European Commission, or in case of a monopoly (where no other organisation can provide the service). This results in 81% of the direct award budget being deployed in countries considered with a “very high” or “high” risk level, and only 0.3% of the direct award budget is allocated to “low” risk contexts. The study shows that direct awards are the most important modality (38%) in the Government & Civil Society sector (Annex 5.8.9). Finally, the analysis finds that, at country-level, 75% of direct awards (€349M out of €465M) are accessible to CSOs and other stakeholders, and 56% of direct awards (€265M out of €465M) are exclusively reserved for CSOs.

Contrary to direct awards, the calls for proposals are mainly used in low-risk and medium-risk contexts: representing 56% of the calls for proposals budget. This distribution may indicate that, in low-risk and medium-risk contexts, calls for proposals seem to be either more feasible and relevant or the regulatory framework applicable in these contexts limits the use of other funding

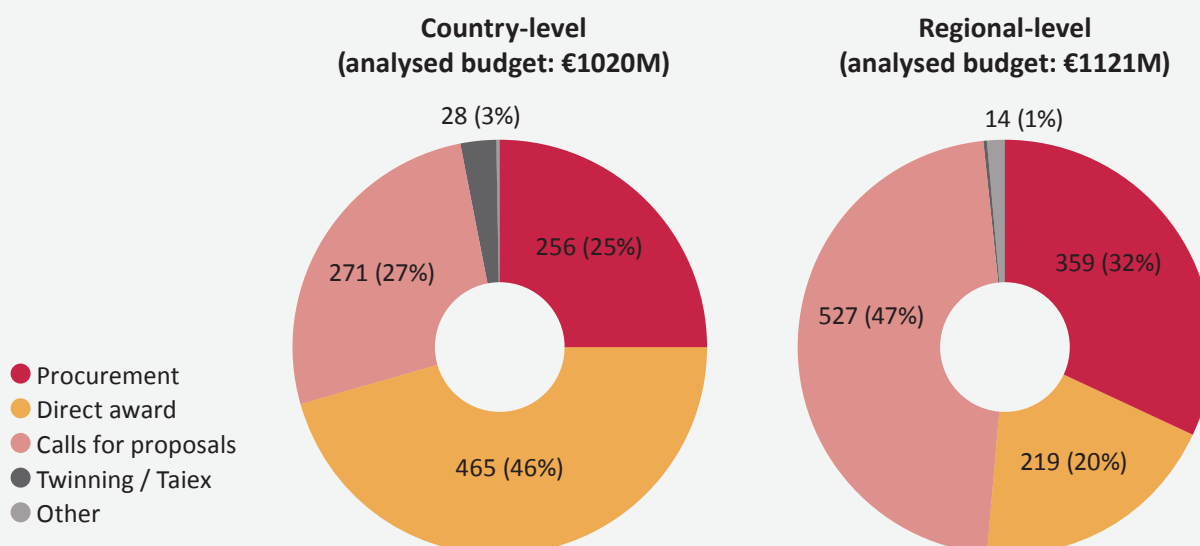
mechanisms for CSOs. Based on the review of country-level action plans and measures, 100% of the budget allocated through calls for proposals is accessible to CSOs. However, only 30% are exclusively reserved for CSOs. For the remaining 70%, CSOs compete for grants alongside other stakeholders.

At regional level, calls for proposals are the dominantly used modality and make up almost half of the directly managed budget (47%), but there is little data on how CSOs are targeted through these modalities. A list of regional programmes included in the study offering funding opportunities for CSOs through calls for proposals can be found in Annex 5.9.

3.3.1 Meeting the eligibility criteria

Both for direct grants and calls for proposals, it is important to note that documents **rarely indicate specific eligibility criteria**. It is also generally difficult to assess the types of organisations that are selected by EUDs through calls for proposals and direct awards.

Figure 8: Budget distribution in €M by modalities under direct management (excl. Budget support)



Note: The two charts above show the distribution of the analysed budget which is directly managed, at country-level (left) and regional level (right). In analysed country-level action plans and measures, the largest share of the directly managed budget (46%) is spent through direct awards, at regional level Calls for proposals prevail (47%).

Direct awards: As highlighted above, direct awards to CSOs are only possible in fragile contexts and exceptionally in case of a monopoly, where no other organisation can provide the service in a specific context. The use of this modality to fund CSOs is therefore quite limited. In addition, a closer analysis of **different types of CSOs eligible for direct awards** shows that the names or the exact types of CSOs selected for direct awards are not consistently indicated. Among 36 documents featuring direct awards, less than 45% (16) indicated the specific names of beneficiaries selected for direct award; the remaining 55% only indicated the types of organisations and entities to be selected. On the basis of such limited data, the graph below illustrates the overall distribution of the direct award budget according to the different types of organisations and CSOs.

It clearly shows that **an overall share of 17% of the analysed geographic NDICI-Global Europe budget (€7.5 bn) was accessible to CSOs:**

- 10% of the analysed budget is accessible to CSOs but they compete with other stakeholders, such as intergovernmental organisations, public authorities or universities.
- **Only 7% of the analysed budget (€ 0.5bn) is**

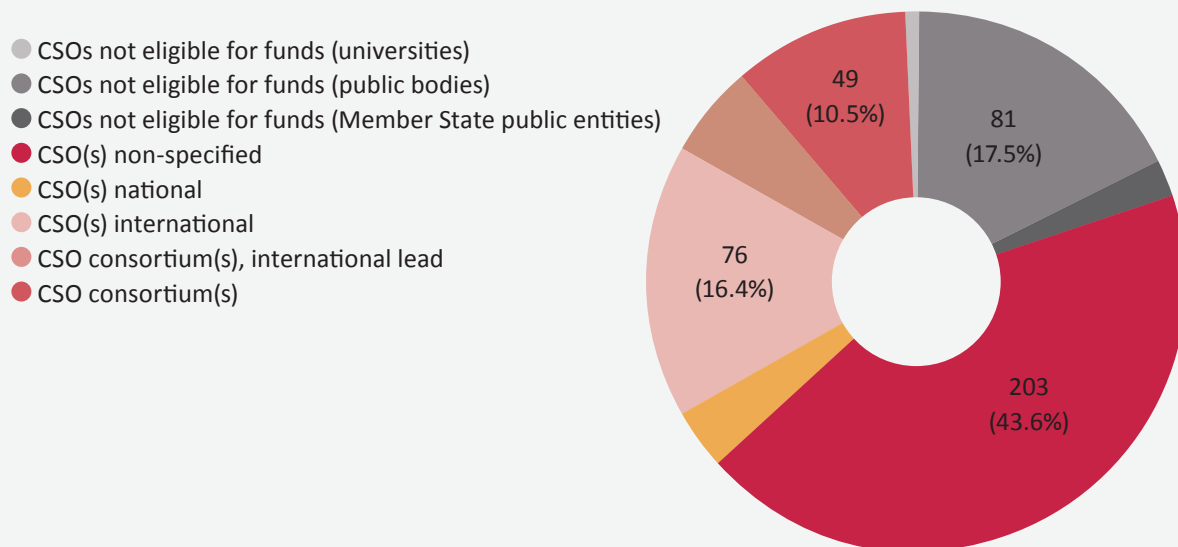
exclusively reserved for CSOs through direct awards and calls for proposals.

It remains a challenge to evaluate to what extent the figures encompass different types of CSOs at local, national and international level without having access to signed EU contracts with CSOs. However, they highlight an overall limited access to EU funding for CSOs.

While direct grants are available to a limited number of pre-identified organisations it is worth mentioning that:

- Once the EUDs have been authorised to use direct awards with a waiver of standard rules, the document review shows that EUDs often use the procedure of calls for expression of interest to grant direct awards. In one country, for example, the EUD conducted sector assessments to pre-identify, based on their experience, a pool of relevant stakeholders in the sector in a discreet way, without advertising calls for proposals publicly (EUD interviewee). The four to five selected potential partners were then invited to submit proposals confidentially for internal assessment, and one or two were chosen for funding. According to the interviewee, this approach makes it possible for the EUD to

Figure 9: Eligibility of CSO types in the direct awards budget in €M, country-level



Note: The chart above shows the distribution of the analysed country-level budget which is spent through direct awards (€465M), by categories of eligibility of (different types of) CSOs.

reach out to a range of stakeholders, despite the restrictive context for CSO support.

- The *Action Document for the EU Support to Democratic Governance in Nigeria (EU-SDGN) Phase II (2021)*²⁴ is an **interesting example** of an action with a strong CSO component. This is built on well-identified partnerships between the EUD and nine different Nigerian CSOs who implement most of the actions (specific objectives 2 - 5), altogether worth €15.5M, with an additional budget of €3.4M for other CSOs through call for proposals (specific objective 6), thereby attributing 46% of the action's global budget (€39M) to Nigerian CSOs.
- Direct awards may also benefit national umbrella organisations which, in some contexts, are considered to have a monopoly. In Cambodia, for example, the EUD identified the Cooperation Committee for Cambodia (CCC) as the only civil society umbrella organisation capable of intervening across sectors and, for this reason, granted it a direct award.

With regard to calls for proposals:

Only 26.5% of the overall analysed budget deployed under direct management is spent on calls for proposals. The review of country-level action plans and measures reveals that eligible applicants are usually defined very broadly. Most calls for proposals are potentially open to CSOs.

However, a certain skill set is required for CSOs to meet the **complex eligibility criteria of calls for proposals**:

- **Technicality of the proposal:** Some of the small or local CSOs face challenges in meeting the requirements of the technical proposal and are not always able to allocate dedicated human resources. As one interview partner recounts, some CSOs hire a grant writing expert, usually a consultant with proficient English skills, to draft their proposals. In consequence, proposals submitted under the same call for proposals have tended to be similar, as the proposals submitted by several different organisations under the same call were written by the same consultant.
- **Financial capacity:** All interviewees - EUD and CSO representatives - are aware that strong

financial capacities and experience with managing such amounts of funding are critical criteria. These requirements are described by one interviewee as a “vicious circle”: in order to “access funding, one must be able to demonstrate experience in managing funding of the same amount. How to gain experience without being able to access funding? Even the co-applicants of a consortium must be able to justify their experience in financial management.” (WRO representative).

- **Access to information and support:** According to some interviewees, CSOs face challenges with access to information and communication technologies. Weak internet signals in remote areas and limited ICT skills make it difficult or even impossible for some organisations to submit their reporting on a digital platform. Furthermore, several interviewees underlined the relational nature of access to information and support by EUD staff. For instance, one interviewee expressed regret about a recent staff change: “Before, the EU's support and funding for CSOs were quick, on time, and open to civil society. They used to coach us, and to provide supervision.” (CSO representative). Finally, several CSO representatives mentioned that language barriers constitute a significant problem in application procedures.

These requirements are not currently adapted to the diversity of capacity and expertise of CSOs. As a consequence, EUDs and their implementing partners continue to face difficulties reaching a diversity of CSOs, especially smaller community-based and grassroots organisations. Two WRO representatives from different countries highlighted that women's rights organisations are even more disadvantaged in the selection processes, because they deal with even more pronounced challenges (lack of capacities to draft technical proposals, lack of ICT capacity and access to information). According to one CSO interview partner “the EU is undergoing an evolution, they are trying to become more flexible, transitioning from a large scale to a medium scale and eventually to a smaller scale. In the future, the most important aspect will be ensuring that grassroots organisations can meet the criteria, or maybe **the criteria should be**

²⁴ Available at: <https://eusdgn.org/>

minimised and the funding modalities should be adapted accordingly.”

Indeed, some interviews with EU representatives indicate that EUDs seem to be considering changes in order:

- to offer generally smaller grants;
- to use sub-granting through local CSOs as a modality to reach smaller and grassroots organisations with very small grants (3 EUDs interviewed). For example, in Tanzania, under a programme dedicated to CSO support, sub-granting to CSOs is managed by a local CSO, the Foundation for Civil Society, which has a strong network at the grassroots level. According to the EUD, this modality is suitable for reaching smaller organisations. However, sub-granting procedures can be complex, and the amount allocated is insufficient for medium-sized organisations.

3.3.2 Beyond access to direct funding: Other barriers

Beyond the challenges associated with eligibility criteria, several interview partners mentioned new difficulties arising during implementation.

- One interview partner underlined the challenges associated with one particular **financial rule**: when implementing EU-funded activities, CSOs receive 90% of the grant. Even though they have to spend the entire estimated budget to bring the project to an end, they cannot access the remaining 10% before submitting the final report. The process of submitting the final report and the liquidation can be lengthy, which poses a financial risk for small CSOs that do not have sufficient cash flow (CSO representative).
- It is clear from examples given by interviewees that the EU relies on **international CSOs to support and partner up with smaller CSOs**. They are only rarely explicitly mentioned in action plans and measures. Nonetheless, considering the grant size and the associated requirements, the EU seems to have an implicit expectation that such partnerships should be formed. Yet, this strategy seems to

be a double-edged sword:

- On the one hand, according to a CSO representative, **a consortium with international NGOs constitutes a channel for grassroots organisations lacking capacities and experience** in funding applications and grant management. From this point of view, the consortium model between international lead- and national or local co-applicants is a mutually beneficial approach, as international NGOs may lack the ability to reach communities.
- On the other hand, **this approach encounters criticism** by some CSO interviewees, who feel that “small and medium-sized organisations are not trusted.” (WRO representative).

The lack of capacity in local organisations is often put forward as an argument to justify the choice of indirect management modes or, under direct management, the delegation of support to smaller CSOs to intermediaries - such as Member State international cooperation agencies, bodies of the United Nations or international non-governmental organisations. One EU representative argued that EUDs also set the criteria **in order to restrict the number of proposals** so that the assessment can be done internally and does not have to be externalised. This is a further indication of the lack of EUD capacity to manage several grants at the same time (EUD interviewee). The cost effectiveness argument is also frequently put forward: “It is not cost-effective to manage ten €100k grants compared to one €1M grant.” (EUD interviewee).

3.3.3 Changing attitudes and approaches

Some action plans demonstrate **self-awareness and critical reflection on the inclusiveness of EU support for a wide diversity of civil society organisations**:

- The *Action Document for associations for local development in Burundi* critically reflects: “Community-based associations are often left out of development programmes (often due to the lack of capacity to manage large

amounts)” and need to be better supported by the EU. p. 6²⁵.

- The *Action Document for Cultiv'ARTE – Strengthening the cultural sector in Mozambique (2022)* undertakes a critical reflection on the reasons why Mozambican CSOs, particularly those outside of the capital, are excluded from implementation and underrepresented in calls for proposals. The document proposes to develop “**targeted customised strategies and approaches to the different territories and stakeholders**” and to provide “information dissemination, support in project design and development; the use of local and clear language and simplified procedures; and structural and longer-term relationships and support are also essential to ensure a wider benefit and participation and sustainable impact.” (p. 12)²⁶.
- The *Action Document for the 2022 Special Measure in support of the Syrian people* also formalises a change in attitudes and approaches: “The EU has been heavily focused on capacity-building of local Syrian organisations and is looking to **provide more support directly to local organisations, rather than through INGOs** (International Non-Governmental Organisations). The EU is currently piloting such a programme with the intention of expanding this approach with this Special Measure should it prove to be effective.” (p. 9-10)²⁷.

3.3.4 Support for CSOs in limited and endangered civic spaces

In limited and endangered civic spaces, the room for manoeuvre of both CSOs and the EU may be restricted. Several interviews with CSO and

EUD representatives provided insights into the challenges and counter-strategies.

- **Restrictions and challenges:** In some countries, CSOs work under close scrutiny by the government. In Jordan, for example, foreign-funded projects require government approval, and CSOs affiliated to the royalty (e.g. royal humanitarian organisations and foundations) have, according to EU and CSO representatives, become implementing partners with a clear privilege, especially compared to more critical human rights organisations or organisations working on sensitive issues (e.g. on the long-term integration of refugees or the rights of children of binational parents). According to a CSO representative from another country, CSOs must hire full time teams to meet the government’s requirements, which small CSOs cannot afford.
- In such contexts, **self-censorship may impact structured dialogue and consultations.** As an EUD representative states, in such contexts “continuous bilateral and informal dialogue is much more effective”.
- In such a context, the EU seems to prioritise more consensual topics for calls for proposals such as climate change, rather than human and women’s rights (CSO representative).
- As the following example shows, in endangered civic spaces, local and grassroots CSOs are more than ever in need of support: According to one interview partner, international NGOs feel reluctant partnering with local CSOs in unstable contexts because of the potential impact on the project implementation: “If the CSO partner is forced to close due to government requirements,

25 EN Translation of the passage from p. 6, Document d'action de programme de soutien au monde associatif pour le développement local au Burundi: “Community-based associations are often left out of development programmes (often because they lack the capacity to manage large amounts of money). It is more often than not the INGOs that benefit from the support of the Technical and Financial Partners (TFP), and so the local CSOs work in sub-delegation with these INGOs. While this configuration has enabled national associations to become stronger, it is now time to give them more responsibility by adopting a more direct approach (avoiding too many intermediaries) so as to support their own involvement in development projects that respond as closely as possible to the needs of rural populations - who are sometimes too remote/isolated to be considered. Finally, the lack of financial independence of the associations will be addressed by developing the approach of associative entrepreneurship and the logic of sustainability.”

26 Available at: <https://www.gtai.de/resource/blob/901886/08efc172210e125ff86beb23a80fbb04/PRO20220927901876%20-%20Annex%202.PDF>

27 Continuation of the quotation: “... Building upon activities in the area of general capacity-building for civil society actors in Syria, the EU will focus upon strengthening governance, operational capacities and the ability to advocate and participate in decision-making for organisations involved in the fields of health and education. These activities will directly respond to the need to broaden the definition of which actors constitute civil society in Syria, while at the same time supporting structures which can provide informed inputs in important policy areas. The presence of competent and well-organised interlocutors may create a counterbalance to actors who currently control all the levers of power, thereby strengthening accountability and social cohesion.”

it could put the entire project at risk. If the donor agrees, they prefer to implement the project alone” (International CSO interviewee).

- In such a situation, the EU must be reactive and flexible: “For example, if one international NGO has four local partners and two of them close down, the EUD would quickly revise the entire project, including changing objectives and activities so the two partners left can continue operating” (EUD interviewee). In highly restrictive contexts, another option for EUDs seems to be to turn to global thematic programmes, such as the pillar for Human Rights and Democracy (€1.36bn), “negotiating with Brussels to allocate some funds” shifting support to CSOs continuing work in exile.

To maintain support to CSOs in crises-affected contexts and in limited and endangered civic spaces, EUD staff may find it difficult to maintain or reallocate funding efficiently. Little quantitative data is available on EUD counter-strategies, but in interviews, EUD representatives identified five paths that could potentially improve EU modalities under such circumstances:

More flexibility: “We need pre-agreed specific rules so we can work more effectively.”

- **Possibilities for confidentiality:** “We need appropriate rules, including rules that allow us to maintain confidentiality.”
- **Diversification of the types of organisations supported.**
- **Joint forces and better coordination** so that governments would be more hesitant to shut down a programme:
 - by diversifying implementing partners, including international organisations;
 - by diversifying funding sources and donor organisations;
 - by putting into place stronger coordination mechanisms between EU Member States.
- **Possibilities to maintain funding** after the closure or departure of a CSO into exile, including through the strategic use and activation of funds through global thematic rather than geographic programmes.

3.4 Conclusions

While the geographic component of the NDICI-Global Europe should provide most of the CSO support and civil society mainstreaming, the following key findings are based on the review of 278 action plans and measures and an overall analysed budget of €7.5 billion:

It is impossible to assess the exact share of funding going to or through CSOs in the EU’s financing decisions for 70% of the analysed geographic NDICI-Global Europe budget.

This assessment challenge is linked to the fact that the EU heavily delegates funding management to pillar-assessed entities, without clear instructions as to whether and how they should sub-grant to CSOs. As there is no evidence that CSOs were entrusted with indirect management of EU funds and no information available about pillar-assessed CSOs, not being pillar-assessed may hinder CSO access to funding.

- Most of the geographic NDICI-Global Europe funding is delegated to other stakeholders, the “pillar-assessed entities”, and managed through “indirect management” (59%).
- Data on funding going to or through CSOs is scarce. For instance, the study finds that only 11% of country-level action plans and measures using the indirect management mode explicitly mention sub-granting to CSOs. At regional level, only 6% mention sub-granting to CSOs.

In addition, while the study shows that a small share of the analysed NDICI-Global Europe funding is indeed accessible to CSOs, it remains difficult to draw further conclusions on the type of CSOs and the measures put in place in order to target CSOs:

- A share of **7%** is identified as explicitly reserved for CSOs (€0.5bn) through grants (direct awards and calls for proposals).
- For a share of **10%**, funding is accessible to CSOs (€0.7bn) but they compete with other stakeholders, such as intergovernmental organisations, Member State international cooperation institutions or universities under direct management.

- A share of **13% is identified as inaccessible to CSOs** (€1bn), reserved for other stakeholders, such as intergovernmental organisations, public authorities and universities.

Finally, the study reveals that efforts have been made by the EU to adopt a more collaborative approach to involve a wider diversity of CSOs in programming and implementation under the NDICI-Global Europe. However, significant challenges persist in key areas such as consultation mechanisms and funding accessibility.



4. RECOMMENDATIONS

The findings of this study show that the current EU funding modalities and practices under the NDICI-Global Europe limit the ability of CSOs to effectively contribute to the implementation of the EU international cooperation programmes.

It is encouraging that the EU acknowledges CSOs as partners in dialogue and advocacy. However, for this partnership to be mutually beneficial, accountable and transparent, the EU must ensure that effective and standardised tools, such as regular consultation and dialogues, are given effect operationally through a diversity of CSO funding mechanisms under the NDICI-Global Europe budget. These funding mechanisms must be adapted to the new geographic programmes, recognise the diversity of CSO actors and cover new initiatives such as the Team Europe approach and Global Gateway. They must also reflect the reduced administrative capacity of DG International Partnerships (DG INTPA), DG

Neighbourhood and Enlargement Negotiations (DG NEAR) and the EU Delegations.

The current regulatory framework does not allow equal and fair access to EU programmes by the full range of possible implementing actors. Instead it favours indirect management by EU Member State international cooperation agencies or international organisations over other funding modalities which are considered too burdensome by EU institutions, considering their limited resources.

This final chapter presents a set of recommendations aimed at fostering greater transparency in NDICI-Global Europe funding and at diversifying the funding going to and through CSOs. The recommendations cover two major themes:

1. Programming and implementation;
2. Access to information & transparency.

Programming and implementation recommendations for NDICI-Global Europe



Allocate earmarked budgets for CSO funding across all NDICI-Global Europe geographic and thematic programmes

Sub-recommendations

1

• Embrace the two types of objectives for working with CSOs: to strengthen a pluralist and independent civil society in partner countries and to meet other development objectives beyond strengthening civil society. Recognising the diversity of CSO expertise and operational capacity, the EU should enable CSOs to contribute to the implementation of all geographic and thematic programmes other than CSO and Human Rights and Democracy (HRD) thematic programmes and enable CSOs to effectively contribute to the wider spectrum of thematic sectors beyond 'government and CSO' category, as confirmed by the official ODA data. The EU should acknowledge the complementary humanitarian, development and peace actions and the crucial role and contribution of CSOs in these actions.

• At least 15% of the NDICI-Global Europe geographic programmes budget should be exclusively reserved for CSOs.

Explanation and good practices

This recommendation is aligned with the OECD recommendation to earmark funding for CSOs, including CSOs based in partner countries.²⁸ It is also aligned with external instruments' regulations under the previous MFF, especially the 11th European Development Fund Regulation.

This is also supported by the Mission letter for Commissioner Urpilainen²⁹ that emphasises the importance of a *“dedicated focus on supporting civil society around the world,”* stressing that the EU shall work to *“ensure they have a far greater role in designing and implementing European policies, programmes and projects.”* In line with this, the European Commission committed to support CSOs across all geographic and thematic programmes.

CSOs have privileged access to the EU thematic programmes ‘Civil Society Organisations’ and ‘Human Rights and Democracy’, which are aimed at policy formulation, advocacy and the defence of human rights internationally. However, these programmes have modest resources representing some 3% of the overall NDICI-GE budget and do not cover the wide spectrum of CSO expertise and implementation capacity.

The 2022 OECD report Aid for CSOs report³⁰ confirmed that most EU aid for CSOs in 2019 and 2020 supported emergency response and government and civil society sectors.



Strengthen accessibility and inclusiveness of funding under indirect management

2

Sub-recommendations

- Rectify the imbalance between the funding mechanisms and financial flows to pillar-assessed organisations as main programme implementers on behalf of the European Commission, on the one hand, and funding mechanisms and flows to CSOs, on the other. Implement strategies to help rectify the imbalance, for example by identifying ways to allow CSOs, with relevant expertise, size and management capacity, to become “pillar-assessed entities”.
- The Financial Framework Partnership Agreement (FFPA) could be a tool to identify CSOs in a specific context and/or thematic sector to be entrusted with the management of EU fund
- Put in place an obligation for pillar-assessed entities to include CSO partners in consortia when conceptualising their programmes under indirect management and to partner with CSOs throughout the project/programme cycle.

28 Funding Civil Society in Partner Countries: Toolkit for Implementing the DAC Recommendation on Enabling Civil Society in Development Co-operation and Humanitarian Assistance, <https://doi.org/10.1787/9ea40a9c-en>, OECD, 2023.

29 Mission letter for Commissioner Urpilainen, https://commissioners.ec.europa.eu/system/files/2022-11/mission-letter-urpilainen-2019-2024_en.pdf.

30 Aid for Civil Society Organisations: Statistics Based on DAC Members' Reporting to the Creditor Reporting System Database (CRS), 2019-2020, <https://www.oecd.org/dac/financing-sustainable-development/development-finance-topics/Aid-for-CSOs-2022.pdf>, Development Assistance Committee, 2022.

- Support and funding to CSOs may be fixed in action plans and measures, and by indicators in the logical framework matrix (e.g. amount of funding made available to CSOs through sub-grants).
- Establish a requirement for pillar-assessed entities to take into account indirect costs for CSO partners or sub-grantees.
- Ensure the choice of pillar-assessed entities is guided by selection criteria that consider the entity's experience and commitment to support civil society stakeholders.

Explanation and good practices

The EU Financial Regulation Art. 62 provides a prescriptive list of entities that may be entrusted with the implementation of EU funds. However, Art. 156 of the same Regulation foresees the possibility for other entities to be 'assimilated' to those under Art. 62. Using Art. 156 could facilitate EU confidence in and reliance on CSOs and increase their access to EU funding³¹.

The EU could use the FPPA as foreseen by Art. 130 of the Regulation to provide for a long-term cooperation mechanism including an ex ante assessment allowing for reliance on the internal systems and procedures of CSOs.

EU Member States are already using modalities that allow CSOs to directly manage funds and sub-grants to CSOs. EU Member States are already using modalities that allow CSOs to directly manage funds and sub-grants to CSOs. For instance, Sweden (SIDA) has a framework agreement with 17 Strategic Partner Organisations (SPO) that receive one quarter of SIDA's funding to support more than 2000 CSOs internationally.³² This modality enables the SPOs to provide core funding to the CSOs they support. France also allows local CSOs to become umbrella organisations and sub-grant to other local CSOs through its Dispositif d'Initiative³³.

This study finds that most NDICI-Global Europe geographic funding is indirectly managed. An obligation for pillar-assessed entities to partner or sub-grant to CSOs would help the EU achieve its commitments to channel its support to CSOs through the NDICI-Global Europe geographic programmes.

Under the Terms of Reference for Pillar Assessments, up to nine pillars may be assessed, the 'Grants' pillar (providing financing from EU funds through grants) should be made mandatory to ensure all pillar-assessed entities are able to provide grants to CSOs.

The Terms of Reference for a Pillar Assessment of an entity requesting to be entrusted with the implementation of the EU budget under indirect management specify that entities must meet the requirements vis à vis nine pillars: three related to the internal control of the entity, three to provide funds to third parties (grants, procurement and financial instruments) and three related to this provision of funds. The three pillars to provide funds to third parties may not be applicable. Making the 'Grants' pillar mandatory would facilitate partnerships with and sub-granting to CSOs.

31 Financial regulation applicable to the general budget of the Union, <https://op.europa.eu/en/publication-detail/-/publication/e9488da5-d66f-11e8-9424-01aa75ed71a1/language-en/format-PDF/source-86606884>

32 Guiding Principles for Sida's Engagement with and Support to Civil Society, Swedish International Development Cooperation Agency, Sida, 2019, https://www.sida.se/contentassets/86933109610e48929d76764121b63fc6/10202931_guiding_principle_2019_no_examples_web.pdf.

33 Financing NGO projects, <https://www.afd.fr/en/financing-ngo-projects>.



Allocate sufficient EUD capacity and resources to implement the 'geographisation' principle

Sub-recommendations

- Assign sufficient financial and human resources to EUD to ensure meaningful interaction and engagement with civil society beyond Gender, HRD and CSO focal points. Ensure clarity over the specific focal point that CSOs can contact for questions.

Offer capacity-building initiatives to potential beneficiaries, especially small and local CSOs, to enhance their ability to access NDICI-Global Europe funding and become implementing partners

3

Explanation and good practices

Several interviewees stressed the need to have dedicated resources at EUD level. This is also aligned with the recommendations in the CONCORD 2023 report: "Implementing the EU Gender Action Plan III: Turning ambition into impact?"

CSOs interviewed in the context of this study, especially local CSOs, highlighted the need for regular training and capacity-building on EU requirements to access funding.



Ensure more regular and inclusive consultation processes and greater feedback on programmatic decisions

Sub-recommendations

- Make dialogue and consultation with CSOs more systematic and place greater emphasis on systematic dialogue at partner country level, while also maintaining opportunities for responsive, strategic and less formal ad hoc dialogue

4

- Use and strengthen existing mechanisms (such as the CSO Roadmaps) for consultation at local, national, and regional levels with reasonable notice for invitation to attend consultations.

- Ensure there is appropriate and quality CSO involvement and input throughout the programming process, especially at the country level, including formulation of the MIPs, drafting of Annual Action Plans (AAP) and throughout the mid-term review process.

- Encourage EUDs to allocate sufficient financial resources to implement the CSO Roadmaps and make sure the Roadmaps include:
- Stable participation mechanisms and follow-up processes, to ensure a continuous, transparent two-way dialogue, with context-specific inputs from CSOs and exchange on the state of civic space.
- Diverse representation of stakeholders, including women, youth and marginalised groups, to capture a broader range of perspectives and ensure programming reaches out to those furthest behind.
- Regular dialogue with CSOs throughout the entire lifecycle of NDICI-Global Europe projects and across sectors.
- Feedback to CSOs involved in consultations on how their inputs have been taken forward.
- Mechanisms to involve more systematically CSOs in Global Gateway and Team Europe Initiatives throughout the consultation and implementation process

Explanation and good practices

Some EUDs already showcase good practices in terms of consultation processes involving civil society. For instance, the EUD in the Philippines engages regularly with civil society through a civil society sounding board.³⁴ Many EUDs are already organising Structured Dialogues with CSOs in partner countries, and this good practice should be expanded in all EUDs. Finally, this recommendation was also figured in DG INTPA's Nexus study³⁵ for crisis-affected countries.



Provide long-term cooperation framework for diverse CSOs

Sub-recommendations

- Facilitate follow-up grants (as a modality already included in the call for proposals) to CSOs in case of positive project/programme evaluation.
- Expand use of grants that allow funding for longer than an average three-year project cycle

5

Explanation and good practices

This recommendation was already shared with the EU during the structured dialogue in 2010-2011. Follow-up grants enable partners to sustain the gains obtained by the projects/programmes. Germany (BMZ) is using a similar modality for grants with CSOs, with a possibility for a programme to be expanded if successful (phase 1 and possibility of a phase 2).³⁶

34 Implementing the EU Gender Action Plan III: Turning ambition into impact?, <https://concordeurope.org/resource/implementing-the-eu-gender-action-plan-iii-turning-ambition-into-impact/>, CONCORD, 2023.

35 HDP Nexus: Challenges and Opportunities for its Implementation, https://international-partnerships.ec.europa.eu/system/files/2023-05/eu-hdp-nexus-study-final-report-nov-2022_en.pdf, European Commission, 2022.

36 DROIT D'INITIATIVE Une étude comparative sur le Droit d'Initiative des OSC dans 6 pays européens https://www.coordinationsud.org/wp-content/uploads/CSUD_Droit_Initiative_OSC_Europe.pdf, ODS, 2022.

Some EU Member States are already providing funding for more than three years, such as Germany and Belgium that offer grants to CSOs for a five-year period.



Increase core funding for CSOs

Sub-recommendations

- Address the imbalance between project funding mechanisms for CSOs and funding flows to CSOs as independent development actors. Increase the availability of core funding/operating grants for CSOs to minimise the administrative burden on both sides and using CSOs' own or co-defined formats and organisational systems.
- Expand at geographic (country, sub-regional and regional) level the use of medium- and long-term cooperation frameworks that provide core funding to CSOs and support their "right of initiative" such as operating grants. Include the possibility for consortium, national networks and diverse types of CSOs to access them.

6

Explanation and good practices

According to the OECD 2020 report: DAC members and CSOs³⁷, core support / operating grants to CSOs are the most development-effective type of support, with advantages such as predictability, flexibility, sustainability, administrative efficiency and, significantly, ownership and accountability. Operating grants are currently offered under various EU domestic funding programmes.

As acknowledged by the OECD³⁸: support through civil society is often top-down and "provider-driven" rather than locally owned. It is also necessary to fund CSO-designed projects that can be more tailored to local needs. Some EU Member States have interesting models: France (AFD) has developed a "dispositif d'initiative" model, open to local CSOs. Belgium has a similar model and channels more ODA to CSOs (close to 18% in 2020) than through CSOs (about 7% in 2020). The EU (DG NEAR) is also already using the FPPA modality at regional level, as shown by recent examples in the Southern and Eastern Neighbourhoods.

37 OECD (2020), Development Assistance Committee Members and Civil Society, The Development Dimension, OECD Publishing, Paris, <https://doi.org/10.1787/51eb6df1-en>.

38 Ibid.23.



Improve access to calls for proposals for CSOs

Sub-recommendations

Simplify application procedures to reduce administrative burdens and encourage wider participation from a diversity of CSOs. Consider the following options:

- Avoid open calls and favour restricted calls, that only require submitting a concept note first and then a full proposal only if the CSO is pre-selected
- Allow applicants to submit proposals in multiple languages for global calls (at least the four languages of the PRAG)
- Adapt the current EU regulations to propose different administrative requirements for different sizes of grants, and reduce requirements for smaller grants (below EUR 60 000 for instance).

Ensure that training, application materials and relevant information:

- are available in multiple languages and published across networks, maximising chances to reach grassroots and remote CSOs;
- provide capacity-building on OPSYS and grants in several languages;
- include a mandatory information session by the EUD or the EC Headquarters when a call for proposal is launched.

7

Explanation and good practices

Interviews with CSOs representatives in the context of this study highlighted the barriers CSOs continue to face when applying to EU calls for proposals, especially smaller CSOs that lack expertise and resources. This recommendation is also aligned with the OECD recommendation to “decentralise and streamline administrative processes and compliance requirements at partner country level (with appropriate guidance)”.

Other donors showcase some good practices, such as USAID which provides a website dedicated to engagement with CSOs and holds regular online information sessions on how to become a partner for funding.³⁹

The CSO representatives interviewed for this study recognise that the current EU regulations represent barriers for some CSOs that do not have the capacity to comply with the financial requirements.

Some EUD already provide qualitative feedback to applicants highlighting their scores, therefore improving the learning process for CSOs

- Consistently provide detailed feedback to unsuccessful applicants that request it, highlighting areas for improvement, thus promoting a learning-oriented approach as per financial regulations.

³⁹ <https://www.workwithusaid.org/>.



Augment direct and simplified financial support for local CSOs and support for a broader civil society in partner countries.

Sub-recommendations

- Minimise the transaction cost burden of the EU grant administrative requirements for local CSOs by using CSOs' own or co-defined formats and systems and adapting requirements to contribution size and risk level.
- Expand small granting schemes for local and small CSOs under each country programme with simplified eligibility and compliance criteria.
- Allow for full pre-financing for local CSOs and facilitate removing the co-financing requirement as this is allowed by the EU Financial Regulation in justified cases
- Encourage the use of the Financial Support to Third Parties (FSTP):
 - Across all programmes
 - Increase the threshold above EUR 60 000 for sub-grantees
 - Make sure capacity-building costs for the sub-grantee are systematically included in the FSTP budget component.
 - Make sure there is no co-funding required for the FSTP component of a grant, as it is extremely difficult for applicants and small/local CSO to find co-funding for this type of mechanism
- Encourage EUDs to use support measures for CSOs (planned in the NDICI-Global Europe) for collaboration and partnership with civil society and ensure the co-financing part is manageable for small CSOs.

8

Expand access to operating grants to small and local CSOs (see above on core funding).

Explanation and good practices

The recommendation to increase FSTP thresholds is aligned with the ongoing 2023 revision to the EU Financial Regulation. In addition, to emphasise the importance of FSTP management costs, we used the following example: the 2022 Human Rights and Democracy call for proposals (EUR 20 million):

- The lead applicant must apply with a minimum of five co-applicants in a consortium. Duration is a minimum of 48 months. Actions must cover at least 10 countries.
- The total budget is EUR 20 million with a 5% co-funding requirement.
- Applicants must propose FSTP with a budget of at least EUR 3 million.
- This leaves EUR 17 million for the (minimum) six consortium members. This is around EUR 2.8 million per applicant, for four years which would need to include the FSTP management costs.

The guidelines have several specific additions related to FSTP but are silent about how to cover these costs and in particular whether they could be covered under the FSTP component i.e. EUR 3 million.

This recommendation is aligned with Articles 24 and 27 of NDICI-Global Europe.

France (AFD) has a “micro project” funding scheme with envelopes from EUR 20 000 to EUR 300 000 for small NGOs⁴⁰.

40 AFD's financing for Civil Society Organisations (2023), <https://www.afd.fr/fr/ressources/infographie-financements-afd-organisations-societe-civile>

Information and transparency recommendations



Facilitate tracking of funding by programme, management mode and type of entity on the Financial Transparency System and in the Commission's annual report on external financing instruments

Sub-recommendations

- Enhance specificity and accessibility of CSO funding data under direct management for each NDICI-Global Europe programme.
- Provide detailed information on the types and diversity of CSOs involved.
- Ensure transparent tracking of funding of indirectly managed funds to ensure cost effectiveness of this management mode.
- Disclose the amount and nature of sub-granting to CSOs in projects under indirect management.

Explanation and good practices

This recommendation is aligned with the NDICI-Global Europe Regulation.

9

It encourages the EC to take into account the European Court of auditors (ECA) recommendations on cost effectiveness:

2021 Annual Reports on the implementation of the EU budget for the 2021 financial year and on the activities funded by the 8th, 9th, 10th and 11th European Development Funds (EDFs) for the 2021 financial year,⁴¹

“8.14. As in previous years, some international organisations provided only limited access to documents (e.g. in read-only format), meaning we could not make copies of them. These issues hindered the planning and execution of our audit and led to delays in the audit team receiving the requested documentation and carrying out its work. We made related recommendations in our 2018 and 2020 annual reports. Although the Commission has stepped up its communication with the international organisations, we continue to have difficulties obtaining the requested documentation.”

According to the ECA 2023 Special report The Spotlight Initiative to end violence against women and girls⁴², “116 An adequate assessment of the Spotlight Initiative's value for money is lacking. The Commission was aware that selecting the UN as its implementing partner

⁴¹ European Court of Auditors (2021), Annual Reports on the implementation of the EU budget for the 2021 financial year and on the activities funded by the 8th, 9th, 10th and 11th European Development Funds (EDFs) for the 2021 financial year, https://www.eca.europa.eu/Lists/ECADocuments/annualreports-2021/annualreports-2021_EN.pdf.

⁴² European Court of Auditors (2023), Special report, The Spotlight Initiative to end violence against women and girls, https://www.eca.europa.eu/ECAPublications/SR-2023-21/SR-2023-21_EN.pdf

would entail higher costs, but it did not attempt to negotiate lower indirect costs than the maximum set in the financial and administrative framework agreement. Almost one third of the total budget is allocated to the management and administration of the Initiative by the UN. Management costs, as well as communication, visibility and evaluation costs, were all calculated as percentages of a programme's direct costs, but there was no detailed reasoning behind the percentages applied."



Ensure the EU Financial Regulation requires accessible information about recipients of EU funds and ensure use of indirect management mode is based on cost effectiveness

10

Sub-recommendations

Make the necessary amendments to the EU Financial Regulation to improve transparency of data on the spending of NDICI-Global Europe funds.

Explanation and good practices

This study finds that pillar-assessed entities' funding choices are largely invisible, which raises questions about compliance with the NDICI-Global Europe Regulation and the EU's own commitments to inclusive partnership, transparency and mutual accountability⁴³.



Ensure transparency and availability of information of action plans and measures

11

Sub-recommendations

This includes:

- Using consistent language on implementing modalities and partners
- Improving information on selection criteria for each management mode, modalities and implementing entities
- Detailing specific sub-granting amounts and modalities for CSOs under indirect management in the action plans and measures
- Give a more detailed rationale behind selection criteria especially regarding CSO types and consortium requirements.

⁴³ Extract from Article 8: "6. In line with the principle of inclusive partnership and transparency, where appropriate, the Commission shall ensure that relevant stakeholders of partner countries, including civil society organisations and local authorities, are duly consulted and have timely access to relevant information allowing them to be adequately involved and play a meaningful role in the design, implementation and associated monitoring processes of programmes."

5. ANNEXES

5.1. Methodology

The present analysis of NDICI-Global Europe funding for CSOs used a mixed methodology, focusing mainly on quantitative data and adding qualitative data for complementary insights. The study was designed and conducted between April and June 2023, over a period of 10 weeks.

The data collection and analysis were based on two main sources:

- (1) publicly available annual and multiannual action plans and measures with their annexes;
- (2) semi-structured interviews with EUD and CSO representatives in five countries, as well as close consultation with CONCORD members.

5.1.1 Review of the NDICI-Global Europe action plans and measures

The desk research focused on **annual and multiannual action plans and measures**, which are the richest in information among openly accessible data sources containing relevant information on management modes and implementing or funding modalities. They also include additional information that can be disaggregated by, for example, primary activity sectors. Action plans and measures are official documents which are adopted by means of Implementing Acts. They present the programmes and actions supported by the EU under NDICI-Global Europe, made publicly available, in English or French, on the DG INTPA⁴⁴ and DG NEAR websites⁴⁵. Given the importance of the geographic component of the NDICI-Global Europe, which represents 75% of the overall NDICI-Global Europe budget (€60.3 billion), the study focused on country-level and regional action plans and measures. It deliberately excluded other components (thematic programmes including the specific thematic programme for CSOs⁴⁶, rapid

response activities and the flexibility cushion). An overview of the NDICI-Global Europe components and the research design, based on the geographic components, is given via Figure 10.

The document review is mostly based on annual and multiannual action plans including support measures (250 out of 278 documents)⁴⁷. The study also considered 22 special measures, two individual measures and four other measures not included in the NDICI-Global Europe Regulation (civil society facilities and investment facilities).

Note on different action plans and measures

According to Articles 23 and 24 of the NDICI-Global Europe Regulation, the EC may adopt different types of actions:

- **Annual or multiannual action plans** based on programming documents and aligned with MIP objectives (may exceptionally “be used to implement rapid response actions”);
- **Annual or multiannual action plans** may include **support measures** providing “support expenditure for the implementation of the Instrument and for the achievement of its objectives”, covering research, evaluation and learning, technical assistance and communications;
- **Individual measures** adopted before or after the adoption of action plans, aligned with MIP (may exceptionally “be used to implement rapid response actions”);
- **Special measures** in the “event of unforeseen needs or circumstances, and where funding is not possible from more appropriate sources”, defining actions not provided for in the MIP;
- **Exceptional assistance measures** may be adopted for rapid response actions.

44 https://international-partnerships.ec.europa.eu/action-plans_en

45 <https://neighbourhood-enlargement.ec.europa.eu/european-neighbourhood-policy>

46 This thematic programme’s overall aim is to “to strengthen CSOs as independent actors of good governance and development in their own right”; EU (2021), Thematic Programme for Civil Society Organisations Multiannual Indicative Programme 2021-2027, https://international-partnerships.ec.europa.eu/system/files/2022-01/mip-2021-c2021-9158-civil-society-organisations-annex_en.pdf.

47 Addendums were considered to replace the initial action plan or measure if the new breakdown of the budget was specified.

Documents describing action plans and measures are mostly structured around six chapters; follows: (1) Synopsis, (2) Rationale, (3) Description of the action (including in most cases a logical framework matrix), (4) Implementation Arrangements (including information on management modes, implementation modalities and the indicative budget), (5) Performance Measurement, and (6) Strategic Communication and Public Diplomacy. Sometimes, the Annex specifies information about the envisaged number of contracts and reporting in the EU's information and programme management system OPSYS.

Budget-related information was extracted from Chapters 1 and 4. Budget figures were taken from the sub-chapter 'Indicative budget' (usually 4.5), data on management modes and modalities details⁴⁸ were extracted from the sub-chapter 'Implementation Modalities' (usually 4.5). **Data on CSO eligibility** was also analysed on the basis of the sub-chapter 'Implementation Modalities' (usually 4.5)⁴⁹. Further CSO-related information was collected through the contextual reading of Chapters 1, 2, 3 and facilitated by keyword searches (starting with 'civil society'/'CSO', and narrowing down or broadening the terminology if necessary)⁵⁰.

Based on an initial review of the documents describing geographic action plans and measures, it was expected that quantitative data could be collected on:

- **Indirectly managed funds**, disaggregated by pillar-assessed entities (EU Member States, international organisation, international financial institutions, partner governments, etc.). When the EU fully or partially outsources the NDICI-Global Europe budget implementation tasks, action documents rarely give instructions on the extent to which the pillar-assessed entities should involve or support CSOs. Therefore, it was anticipated and confirmed that **it would not be possible to estimate the amount of funding for CSOs under indirect management**. Two alternative indicators of CSO support under indirect management were therefore chosen:

- Experience and partnerships with CSOs as one of several criteria for the selection of implementing partners (explicitly mentioned);
- Sub-granting to CSOs (explicitly mentioned).

- **Directly managed funds**, especially two 'CSO-relevant' funding modalities: direct awards and calls for proposals. On the basis of these two categories, it was expected that it would be possible to estimate the total funding amount (€) and the relative funding amount (%) available for CSOs under direct management.
- **Other budget categories**, namely *budget support* (directly integrating partner government budgets), *contingencies* and *evaluation* costs were only considered for comparative purposes.

After the completion of the data review, collection and cleaning, four types of indicators were operationalised⁵¹:

- **Basic indicators** including the unique identifier for each action plan and measure, the document type, its scope, etc.
- **Context indicators** including programming information (links to MIP and MIP priorities, links to TEIs, primary activity sector, CIVICUS civic space rating, EC INFORM crisis risk levels.)
- **General budget indicators including management modes and implementing modalities**
- **CSO funding, eligibility and support indicators**
 - Alternative indicators to evaluate the place of CSOs under indirect management
 - CSO funding and eligibility indicators under direct management

The analysis covered all programming documents available for a sample of 40 countries, which were selected based on a non-probability sampling, considering:

- **Data availability** of at least one action plan or measure
- **Geographic quotas** defining a number of countries per region: Asia Pacific (8), Africa (20), Middle East and Eurasia (8), Latin America and Caribbean (4)
- **Diversity quotas** considering the variety of contexts and civic spaces [list of Least

48 For an overview of different management modes and the grant modalities and aid modalities most likely to be used by CSOs, see Annex 5.3 and 5.4.

49 Hypothetical scenarios of changes in modalities were not taken into account.

50 Note on the definition and consideration of CSOs through contextual reading: Annex 5.3.

51 See full list in Annex 5.6.

Developed Countries⁵², EC INFORM risk indicator from 1 very low to 5 very high as well as CIVICUS' ranking of civic spaces from 1 open to 5 closed]

Overall, the document review included 162 country-level and 116 regional action plans and measures, published in English or French between November 2022 and April 2023. Data was collected through an extensive computer-assisted review of 278 documents altogether and fed into a common database. Data processing and cleaning, including data coherence checks, were necessary before proceeding to the data analysis phase.

The diagram below gives an overview of the sources, methods and indicators used and developed for this study.

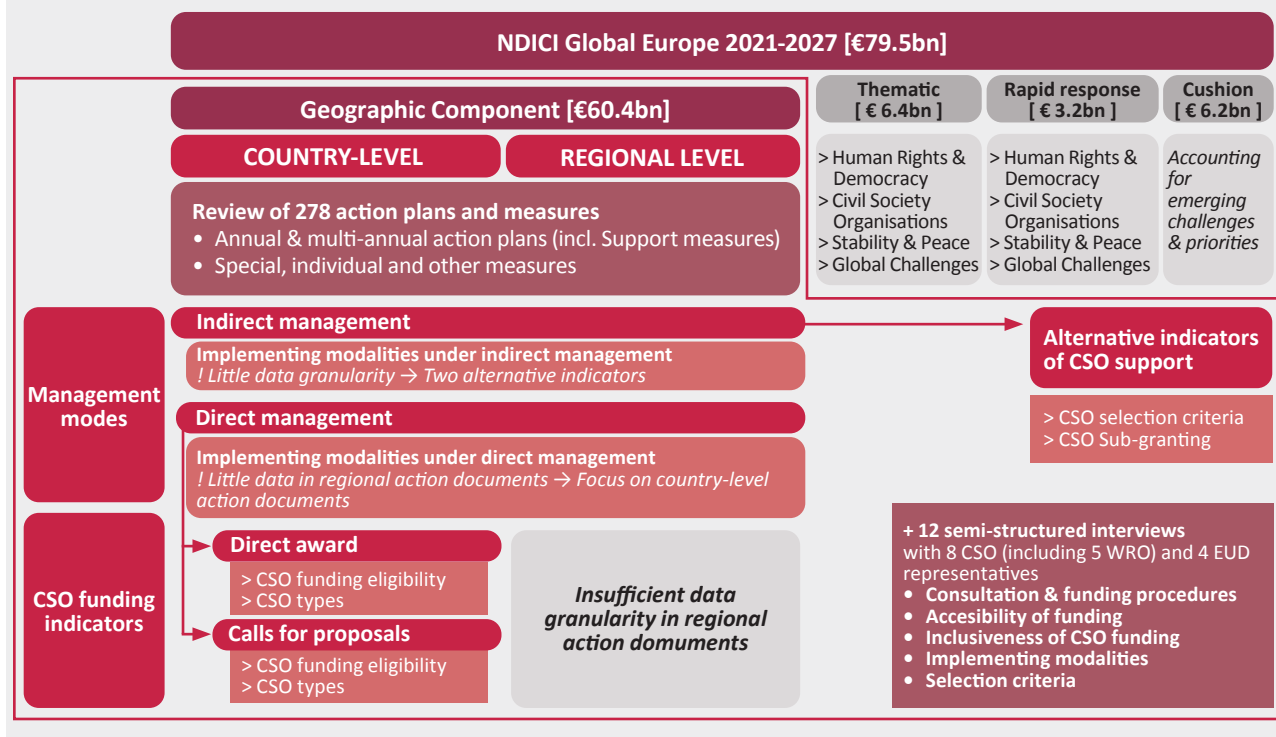
5.1.2 Semi-structured interviews

Among the 40 selected countries, a sub-sample of five countries was identified for case studies:

- Sub-Saharan Africa: **two countries**
- Southern Neighbourhood: **one country**
- Latin America and the Caribbean: **one country**
- South-east and East Asia: **one country**


At the **country-level**, the aim was to conduct **15 semi-structured interviews** with representatives of the five EU Delegations (EUD), ideally the Heads of cooperation, and two CSOs per country, including at least one WRO and covering CSOs with different levels of EU partnership and funding experience⁵³. At regional and global level, for further insights into CSO funding and support mechanisms, the objective was to conduct **five more interviews** with three representatives of Directorates-General's Regional Units and two representatives of some of the most actively involved Member State international cooperation agencies, namely GIZ and AFD.

Figure 10: Study design, sources, methods and indicators



52 UN List of Least Developed Countries, <https://www.un.org/ohrls/content/list-ldcs>

53 A minimum of experience and knowledge was considered necessary in order to speak about EU consultation and support mechanisms.



The semi-structured interviews aimed to capture the respondents' perspective on EU support and funding mechanisms, to identify perceived barriers and challenges, and to discuss recommendations for improvement. Specific semi-structured interview guides were developed for the different target groups, and adapted to the role and experience of each individual interviewee, for example, according to whether a CSO had a lot or very little experience with EU grants. Beyond predefined questions, during the interview, an open approach was taken in order to leave space for additional questions and a free flow of the conversation, opening the field of possible answers and bringing further relevant insights.

At the **country-level**, a total number of **12 interviews** were successfully conducted (success rate: 80%), with a satisfying diversity of profiles: four EUDs, eight CSOs, including five WROs. The response rate of representatives of EU regional units, GIZ and AFD was very low, and no interview could therefore be conducted with them. Taking into account the sensitive nature of certain remarks or contexts, consent and confidentiality were addressed during the initial contact and agreed upon before the interview. For this reason, it was decided that it would be best to refrain from systematically stating references to the CSO type or the country and producing country-specific case studies.

5.1.3 Limitations and outlook

(1) One limitation of the study was the **short timeline of the data collection period** which limited interviewee availability and made it necessary to collect quantitative and qualitative data in parallel. Future studies could benefit from an extended data collection period to allow for a staggered and therefore richer complementarity of the qualitative and quantitative insights.

(2) The **partially inconsistent nature of the documents** analysed for this study represents another limitation⁵⁴. While action plans and measures show a seemingly high level of standardisation, some values are not

systematically incorporated (e.g. for DAC codes). Furthermore, a varying level of detail and unclear use of terminology (e.g. the catch-all term 'pillar-assessed entities') limit the consistency of the findings. Finally, action plans and measures may contain indicative elements requiring further specification and can, in some cases, evolve over time (formal amendment necessary). In the future, complementary data sources, ideally contractual data, could be consulted for a more comprehensive analysis of funding flows⁵⁵. For this study, the EC could not provide any further information.

(3) Another limitation concerns the **limited focus of this study on qualitative data**, as the intended focus of the analysis was on quantitative data extracted from official documents rather than on perceptions of stakeholders involved in the NDICI-Global Europe implementation. As a result, the sample of countries and interviewees should not be considered representative, but rather illustrative. Future research could benefit from a stronger focus on qualitative data to complement the findings of this study.

(4) A further limitation of this study was the **insufficient number of data points for conducting a trend analysis** of the quantitative data. The 278 action plans and measures reviewed for this study cover the first two years of the NDICI-Global Europe under the MFF 2021-2027. Publications primarily follow a programming logic and cannot be seen as consecutive series of comparable data points. Retrospectively, with regard to previous MFFs, data for comparison is not available. To identify significant trends or patterns over time, future research could (i) use this study as a baseline to be replicated in the future for a more reliable basis for trend analysis of accumulated data, and (ii) collect a larger dataset to enhance the statistical power and validity of the data.

(5) The **response and participation rate of interview partners** presented another limitation in this study. In spite of flexible scheduling options and follow-ups, some interviewees were not able to participate, resulting in a non-response bias.

⁵⁴ See Annex 6.8.7.

⁵⁵ For the present study, OPSYS data could not be accessed and analysed, despite a request made by CONCORD Europe to the Commission in May 2023.

The absence of these perspectives may have impacted the richness of the study. In addition, **language barriers** with interview partners might have affected the depth of the interviews. In future studies, the researchers should consider engaging bilingual or multilingual interviewers, or a country-based interpreter to overcome this limitation.

(6) Confidentiality concerns for interviewees also need to be acknowledged as a limitation. Due to the sensitive nature of the research topic, participants in some contexts may have been reluctant to share information. The researchers made efforts to protect the confidentiality of the interviewees, accepting the implications this would have on the specificity of country-related details.

5.2 Country list for the document review

Region (EU)	Sub-region	Country	CIVICUS	LDC	EC INFORM	Number of action plans and measures
Asia and the Pacific	Central Asia	Kazakhstan	4 - repressed	no	2 - Low	1
	Middle East/Gulf	Iraq	5 - closed	no	5 - Very high	1
	South Central Asia	Kyrgyzstan	3 - obstructed	no	2 - Low	2
	South Central Asia	Sri Lanka	3 - obstructed	no	2 - Low	3
	South Central Asia	Nepal	3 - obstructed	yes	3 - Medium	6
	South Central Asia	Pakistan	4 - repressed	no	4 - High	3
	Southeast and East Asia	Vietnam	5 - closed	no	2 - Low	4
	Southeast and East Asia	Cambodia	4 - repressed	yes	3 - Medium	1
	Southeast and East Asia	Lao People's Democratic Republic	5 - closed	yes	3 - Medium	3
	Southeast and East Asia	Myanmar	5 - closed	yes	5 - Very high	6
Latin America and the Caribbean	Caribbean	Dominican Republic	2 - narrow	no	3 - Medium	1
	Caribbean	Honduras	4 - repressed	no	4 - High	2
	Latin America	Bolivia	3 - obstructed	no	3 - Medium	2
	Latin America	Colombia	4 - repressed	no	4 - High	1
	Latin America	Nicaragua	5 - closed	no	3 - Medium	3
	Latin America	Peru	3 - obstructed	no	3 - Medium	2
Neighbourhood	Eastern Neighbourhood	Georgia	2 - narrow	no	2 - Low	2
	Eastern Neighbourhood	Ukraine	3 - obstructed	no	4 - High	4
	Southern Neighbourhood	Jordan	4 - repressed	no	3 - Medium	6
	Southern Neighbourhood	Lebanon	3 - obstructed	no	3 - Medium	8
	Southern Neighbourhood	Libya	5 - closed	no	4 - High	3
	Southern Neighbourhood	Syria	5 - closed	no	5 - Very high	2

Sub-Saharan Africa	East Africa	Burundi	4 - repressed	yes	4 - High	9
	East Africa	Comoros	3 - obstructed	yes	3 - Medium	4
	East Africa	Kenya	3 - obstructed	no	5 - Very high	6
	East Africa	South Sudan	4 - repressed	yes	5 - Very high	5
	East Africa	Tanzania	4 - repressed	yes	4 - High	3
	Southern Africa	Mozambique	4 - repressed	yes	5 - Very high	8
	Southern Africa	Namibia	2 - narrow	no	3 - Medium	3
	Southern Africa	Zambia	3 - obstructed	yes	3 - Medium	5
	Southern Africa	Zimbabwe	4 - repressed	no	3 - Medium	2
	West & Central Africa	Benin	4 - repressed	yes	3 - Medium	6
	West & Central Africa	Burkina Faso	3 - obstructed	yes	5 - Very high	6
	West & Central Africa	Cabo Verde	1 - open	no	2 - Low	2
	West & Central Africa	Democratic Republic of Congo	4 - repressed	yes	5 - Very high	12
	West & Central Africa	Gabon	4 - repressed	no	2 - Low	2
	West & Central Africa	Ghana	3 - obstructed	no	3 - Medium	6
	West & Central Africa	Nigeria	4 - repressed	no	5 - Very high	5
	West & Central Africa	Senegal	3 - obstructed	yes	3 - Medium	7
West & Central Africa	Togo	4 - repressed	yes	3 - Medium	5	

5.3 Note on the definition of CSOs

Whereas Recital (46) of the preamble of the EU's NDICI-Global Europe Regulation (209/7, 14.06.2021)⁵⁶ gives a broad definition of civil society organisations (see p.8), country-level action plans and measures feature **diverse terminology, ranging from specific to broad designations**, e.g.: 'youth organisations', 'women's rights organisations', 'grassroots organisations',

'non-governmental organisations', 'civil society organisations'. For example, one *Action Document for the EU-Vietnam Women-led Green Partnership Programme (2023)*, referring to 'grassroots non-State-actors' (p. 22) illustrates that EUDs take a certain liberty in describing civil society stakeholders, but us terminology which take into consideration the specific, sometimes sensitive context: according to this document, in Vietnam, "In contrast with government's commitments, the effective participation of non-State-actors (NSAs),

⁵⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R0947>

be it NGOs, Community [sic!] Based Organisations (CBOs), academia, research institutes, associations, unions, social enterprises, youth and women movements, and private sector actors, in policy-making and monitoring processes is still challenging due to shrinking space and increased administrative control.” While this context-sensitive choice of words may be appropriate for multiple reasons (acceptance of the action, efficiency, protection, etc.), civil society is not always a clearly distinguishable concept. Therefore, the analysis undertook a contextual reading, aiming to establish whether the terminology used primarily referred to CSOs. Based on contextual reading of the document for Vietnam, it was considered that ‘NSAs’ could be interpreted as CSOs⁵⁷.

5.4 Management modes

According to Article 26 of the NDICI-Global Europe Regulation, there are two major “methods of cooperation” or management modes. Financing under the instrument shall be implemented “either directly by the Commission, by EUDs or by executive agencies, or indirectly through any of the entities listed in the Financial Regulation.” According to points (a) and (c) of Article 62(1) of the Financial Regulation, budgets may be implemented:

(a) directly (‘direct management’) [by the EU], its departments, including its staff in the EUD under the authority of their respective Head of Delegation.

(c) indirectly (‘indirect management’) [...] by entrusting budget implementation tasks to: (i) third countries or the bodies they have designated; (ii) international organisations or their agencies, within the meaning of Article 156; (iii) the European Investment Bank (‘the EIB’) or the European Investment Fund (‘the EIF’) or both of them acting as a group (‘the EIB group’); (iv) Union bodies referred to in Articles 70 and 71; (v) public law bodies, including Member State organisations; (vi) bodies

governed by private law with a public service mission, including Member State organisations, to the extent that they are provided with adequate financial guarantees; (vii) bodies governed by the private law of a Member State that are entrusted with the implementation of a public-private partnership and that are provided with adequate financial guarantees; (viii) bodies or persons entrusted with the implementation of specific actions linked to the Common Foreign and Security Policy (CFSP) [...].

While the budget may also be managed in a **shared** manner (see Article 62(1)(b)) of the Regulation, the present study focuses on direct and indirect management which are most relevant to the analysis of geographic action plans and measures.

5.5 Grant aid modalities most likely to be used by CSOs

The grant aid modalities most likely to be considered by CSOs are grants, awarded through **calls for proposals, direct awards** (cf. Articles 189, 194 and 195 of the Financial Regulation), **Financial Framework Partnership Agreements (FFPAs)** and **Financial Support to Third Parties (sub-granting)**.

While Article 189 reflects the commitment to transparency and specifies that “Grants shall be awarded following a publication of calls for proposals”, Article 195 defines the exceptional circumstances under which “Grants may be awarded without a call for proposals”. Such exceptional circumstances include inter alia grants for humanitarian purposes and emergency situations as well as grants for entities “with a de jure or de facto monopoly”.

Article 27 of the NDICI-Global Europe Regulation specifies other situations the direct award procedure may be used for: low-value grants to human rights defenders, to finance actions where the publication of a call for proposals would be inappropriate (e.g. where there is a threat to

57 Multiple references to shrinking civic space, and an explicit mention of the connotation of NGOs: “Engaging with NSAs in Viet Nam is a mixed picture. 1) In the political context of Viet Nam, where NSAs are not yet seen as legal entities, insisting in naming non-profit-organisations and non-governmental-organisations as NSAs often puts these organisations at risk of being questioned by the authorities. This Partnership Programme will focus on the results, rather than arguing about terminology. 2) Despite limited resources and shrinking space, the NSA community in Viet Nam is vibrant and dynamic. The number of registered NGOs has risen from fewer than 200 in the late 1990s to an estimated 1 700 today.” (p. 6)

democratic institutions, escalation of crisis or armed conflict or human security is most at risk) and low-value grants to CSOs including simplified forms of financing (cf. Article 125 of the Financial Regulation).

AID MODALITY	OPPORTUNITIES FOR CIVIL SOCIETY
Calls for proposals	<p>Usually includes civil society as an actor. Award based on quality of application, fulfilment of call criteria contained in the Call for Proposals guidelines and internal decision-making process.</p> <p>Calls for Proposals are published on the EU Funding and Tender Opportunities portal.</p> <p>Programme design, award and contracting is mainly managed by EU Delegations for single country programmes or by DG INTPA or DG NEAR for regional or global calls.</p>
Direct awards	<p>The actor is approached to submit an application without going through a call for proposal. May also be awarded in exceptional situations, in case of monopoly situations, in fragile countries operating under flexible procedures or to ensure a rapid response to provide strategic support when there is no time to go through a call for proposals.</p> <p>Can also include low-value grants to human rights defenders to finance urgent protection actions and needs and low value grants to civil society organisations.</p>
Financial Support to Third Parties (sub-granting)	<p>A financing mechanism that can support CSOs, whereby the donor provides funding to a generally well-established or umbrella organisation, which in turn facilitates funding (in the form of subgrants) for a number of smaller or grassroots organisations.</p>
Framework Partnership Agreements (FPAs)	<p>Framework Partnerships can be entered into by civil society networks, normally following a call for proposals. Once accepted as an FPA-holder, dedicated funding streams may be available.</p> <p>The eligibility criteria determining support for national or regional networks include: strategic plan with long-term vision, specific objectives, proven organisational and management strengths, democratic internal governance etc.</p>

Source: CONCORD (2022), Guide to Global Europe Funding 2021-2027: For civil society organisations, <https://concordeurope.org/resource/guide-to-global-europe-funding-2021-2027-for-civil-society-organisations/>

5.6 Indicator list

INDICATOR LIST COLLECTED AND CREATED FOR EACH DOCUMENT		
BASIC INDICATORS		
UNIQUE IDENTIFIER	FILENAME	AD_ID
• Action Document type	(Multi-)Annual Action Plan* Special Measure Individual Measure * including Support Measure and Cooperation Facility Programmes	AD_type
• Action Document scope	Country Regional Thematic	AD_scope
• Country	Country name and 3-digit ISO country code (NA: regional)	AD_country
• Region	Asia and the Pacific Latin America and the Caribbean Neighbourhood Sub-Saharan Africa	AD_region
• Sub-Region	Central Asia Middle East/Gulf South Central Asia Southeast and East Asia Caribbean Latin America Eastern Neighbourhood Southern Neighbourhood East Africa Southern Africa West & Central Africa	AD_sub-region
• Language	English (EN) French (FR)	AD_lan
• Year(s)/Period	2021 2022 2023 2023 2024 2025 2026 2027	AD_yearmin + AD_yearmax
CONTEXT INDICATORS		
• MIP	Action Document linked to MIP [yes no]	AD_MIP
• TEI	Action Document linked to TEI [yes no]	AD_TEI
• MIP Priority Areas	Migration Climate Social Inclusion and Human Development* Gender Biodiversity Human Rights, Democracy and Governance *including the priority 'Education' (merged, category not systematically available)	AD_MIPprioMIG AD_MIPprioCLIM AD_MIPprioSIHDE AD_MIPprioGEN AD_MIOprioBIOD AD_MIPprioHRDG
• Primary sector	Primary sector based on the 3-digit DAC sector code indicated (e.g. 150 for Government & Civil Society)	AD_primsector
• CIVICUS civic space rating	Closed Repressed Obstructed Narrowed Open (NA: regional)	CIVICUS
• Least developed countries (UN-LDC list)	no LDC (0) LDC (1)	UN_LDC
• EC INFORM Risk status	1- Very low 2 - Low 3 - Medium 4 - High Very high	EC_INFORM
GENERAL BUDGET INDICATORS		
• Global budget	Total amount of EU contribution in €M	Total
• Management modes	Amount in €M under indirect management Amount in €M under direct management excluding budget support Amount in €M for budget support (under direct management) Amount in €M for contingencies & evaluations (under direct management)	Total_IDM Total_DM Total_DM-BS Total_CONT
• Modalities under direct management	Budget support in €M Procurement in €M Grants through direct award in €M Grants through calls for proposals in €M Twinning grants in €M Other or non-specified in €M	Total_DM-BS Total_DM-PROC Total_DM-DA Total_DM-CFP Total_DM-TWIN Total_DM-OTH
• Primary modality under direct management	Budget support Procurement Grants through calls for proposals Grants through direct award Twinning Other	DM-primmodality
• Modalities under indirect management	Budget managed by a 'pillar-assessed entity' in €M Budget managed by a (pillar-assessed) Member State international cooperation institution in €M Budget managed by a (pillar-assessed) international organisation in €M Budget managed by a (pillar-assessed) international financial institution (IFI) in €M Budget managed by a (pillar-assessed) partner government in €M Budget managed by a non-specified or other entity in €M	Total_IDM-PAE Total_IDM-MS Total_IDM-IO Total_IDM-IFI Total_IDM-PG Total_IDM-OTH

• Primary management mode	Indirect management Direct management Budget Support Equal share of direct and indirect management	Primmode
• Primary Member State under indirect management	AECID AFD Enabel Expertise France Finland's Ministry of Foreign Affairs GIZ LuxDev Ministry of Foreign Affairs of Denmark SIDA non-specified	IDM-primms
CSO FUNDING INDICATORS UNDER DIRECT MANAGEMENT		
• Overall potential CSO budget under direct management	Overall potential CSO budget (direct award and CfP) in €M	Total_DM-CSO
• Overall CSO budget under direct management	Total budget going exclusively to or through CSOs (direct award and CfP) in €M	Total_DM-CSO-excl
	Total budget going facultatively to or through CSOs (direct award and CfP) in €M	Total_DM-CSO-fac
• Relative CSO budget under direct management in global budget	Share of direct management budget (excl. budget support) going exclusively to or through CSOs in % of the global amount	Share_DM-CSO
	Share of direct management budget (excl. budget support) going exclusively to or through CSOs in % of the global amount	Share_DM-CSO-excl
	Share of direct management budget (excl. budget support) going facultatively to or through CSOs in % of the global amount	Share_DM-CSO-fac
CSO ELIGIBILITY FOR FUNDING UNDER DIRECT MANAGEMENT - DIRECT AWARD		
• Potential CSO budget in CfP	Overall potential CSO budget (direct award) in €M	Total_DM-DA-CSO
• Exclusive CSO budget as direct award	Budget going exclusively to or through CSOs (direct award) in €M	Total_DM-DA-CSO-excl
• Facultative CSO budget as direct award	Budget going facultatively to or through CSOs (direct award) in €M	Total_DM-DA-CSO-fac
• CSO eligibility	Exclusively eligible (CSO only) Facultative eligible (CSO among others) Ineligible	Elig_DM-DA-CSO
• CSO type information	Type(s) Name(s)	Elig_DM-DA-CSO-typeinfo
• Eligible CSO types under direct award	National CSO(s) International CSO(s) international CSO umbrella/platform CSO consortium(s) CSO consortium with international lead CSO(s) non-specified	Elig_DM-DA-CSO-type
CSO ELIGIBILITY FOR FUNDING UNDER DIRECT MANAGEMENT - CALLS FOR PROPOSALS		
• Potential CSO budget in CfP	Overall potential CSO budget (CfP) in €M	Total_DM-CFP-CSO
• Exclusive CSO budget in CfP	Budget going exclusively to or through CSOs (CfP) in €M	Total_DM-CFP-CSO-excl
• Facultative CSO budget in CfP	Budget going facultatively to or through CSOs (CfP) in €M	Total_DM-CFP-CSO-fac
• CSO eligibility in CfP eligible CSO types in CfP	Exclusively eligible (CSO only) Facultative eligible (CSO among others) Ineligible	Elig_DM-CFP-CSO
ALTERNATIVE CSO FUNDING INDICATORS UNDER INDIRECT MANAGEMENT		
• CSO sub-granting	Explicit mention of CSO sub-granting under indirect management [yes no] <i>*no specific amount of CSO sub-granting in €M [lacking data]</i>	IDM-CSO-Subgranting
• CSO-related criteria for selection of primary implementing	Primary implementing partner selection criteria favouring expertise or experience in working with CSOs [1 - yes 0 - no]	IDM-CSO-SelCrit

5.7 Further data sources

Financial Transparency System (FTS)

The FTS is a search tool that gathers information on funding from the EU budget going to various beneficiaries from the following sources⁵⁸:

- EU budget directly administered by the Commission's departments, its staff in the EUDs, or through executive agencies;
- EU budget implemented indirectly by international organisations or non-EU countries ('indirect management');
- European Development Fund.

In contrast to the action plans and measures, which contain budget indications as they are programmed, the FTS publishes amounts and names of the beneficiaries of EU funds awarded by the Commission every year. It distinguishes between 'committed' (or awarded) and 'consumed' amounts. For the current MFF, data is available for the years 2021-2022. According to the EU new Financial Regulation and its rules of application, no information on public procurement contracts with a value less than EUR 15 000 have been published (since 2012).

For the present study, we used the following multiple database filters:

- 'YEARS': 2021; 2022 (for the years covered by the current MFF, 2023 data is unavailable);
- 'PROGRAMME': 6.0.111 NDICI-Global Europe;
- 'MANAGEMENT MODE': Direct and indirect management.

Based on these filters, the data shows that more than half of the overall committed funding amount between 2021-2022 is spent through indirect management:

However, data granularity is limited on the FTS and it would be necessary to clarify how the two categories 'Non-governmental organisations' and 'Not-for-profit organisations (NFP)' are defined, to distinguish different types of CSOs (national, international, size etc.), and to provide data for each NDICI-Global Europe programmes (geographic and thematic).

The EU Aid Explorer

The EU Aid Explorer is a web portal that draws together data published to OECD and IATI by EU institutions and Member States. By providing a harmonised view of publicly available data, it should, in principle, make data easily accessible, allow for the examination of donor funds and improve coordination and effectiveness⁵⁹.

For the present study, we used the following multiple database filters:

- 'YEARS': 2021; 2022; 2023 (for the years covered by the current MFF);
- 'DONOR CATEGORY': EU Institutions;
- 'CHANNELS': Developing country-based NGO; Donor country-based NGO.

As the database web viewer seems to hold more detailed data than the database filters suggest (e.g. TEI, project references, etc.), we need to gain a better understanding of the different variables for a more comprehensive analysis of funding. Particularly, it would be necessary to understand the definitions of the two categories 'Developing country-based NGOs' and 'Donor country-based NGOs', as well as definitions of different spending categories, such as 'Commitments' and 'Net disbursement'. Finally, there are important contradictions between the figures in the database and those reported to the OECD DAC. It would be necessary to understand the reasons for these differences and align them as much as possible.

FTS NDICI-Global Europe Funding amount in €bn	Direct management	Indirect management	Total
committed	6.71	7.07	13.78
<i>in %</i>	49%	51%	100%
consumed	3.55	3.97	7.52
<i>in %</i>	47%	53%	100%

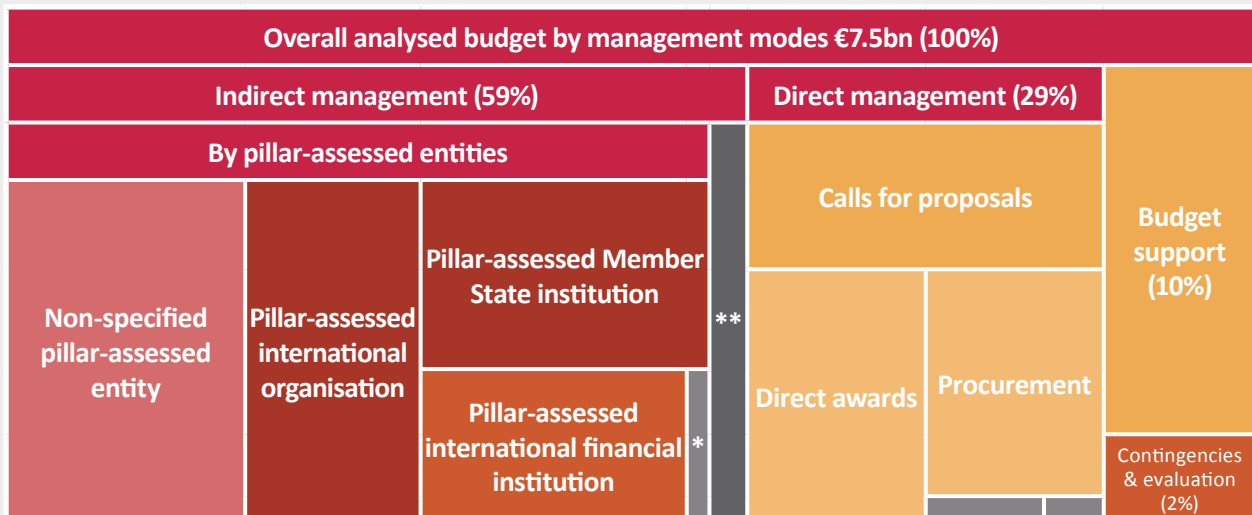
⁵⁸ EC Financial Transparency System, <https://ec.europa.eu/budget/financial-transparency-system/about.html>.

⁵⁹ https://euaidexplorer.ec.europa.eu/about-eu-development-assistance_en; EU Aid Explorer Business Rules, https://euaidexplorer.ec.europa.eu/system/files/2021-04/eu_aid_explorer_-_business_rules.pdf

5.8 Charts and graphs

5.8.1 Tree map chart of relative country budget distribution by management mode and modalities

Tree map chart: Distribution of the overall analysed budget (€7.5bn) by management modes and funding modalities



PG: Partner government

* Non-specified implementing partners | **other

Note: Pillar-assessed entities encompass a range of institutions that have been assessed and certified for their financial capacities. While action plans and measures sometimes specify the type of implementing partner (international organisation, Member State international cooperation institution, etc.), many only refer to the non-specific term “pillar-assessed entity”.

5.8.2 Overview of analysed budget flows in €bn for CSOs at country versus regional level

Figure 11: Overview of the distribution of the country-level analysed budget in €bn

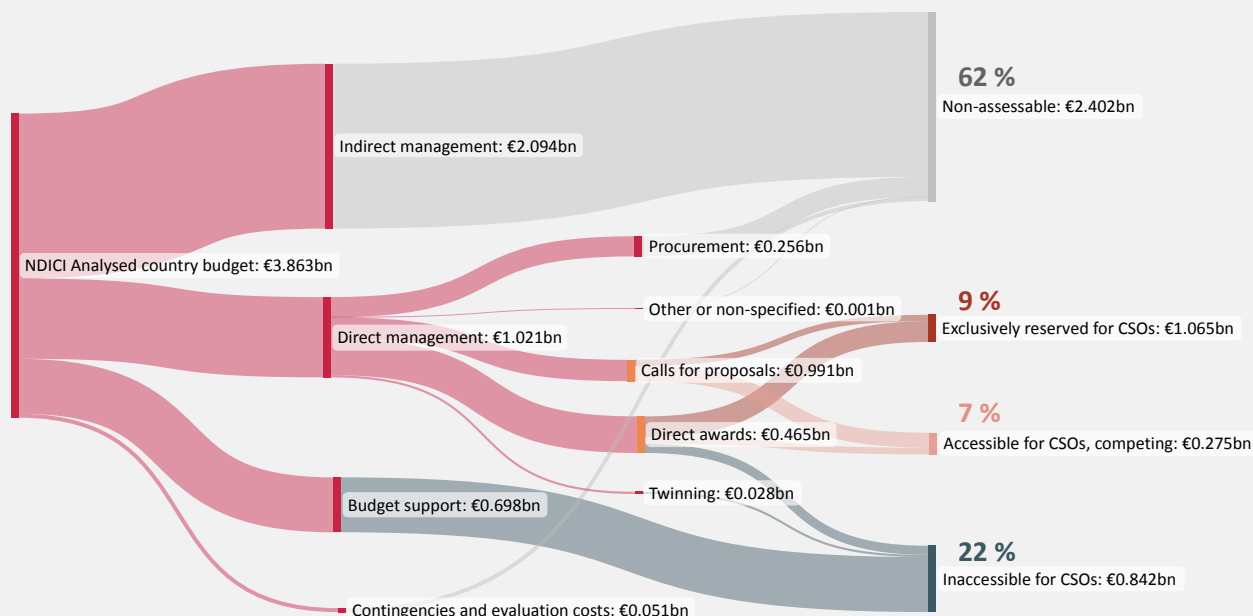
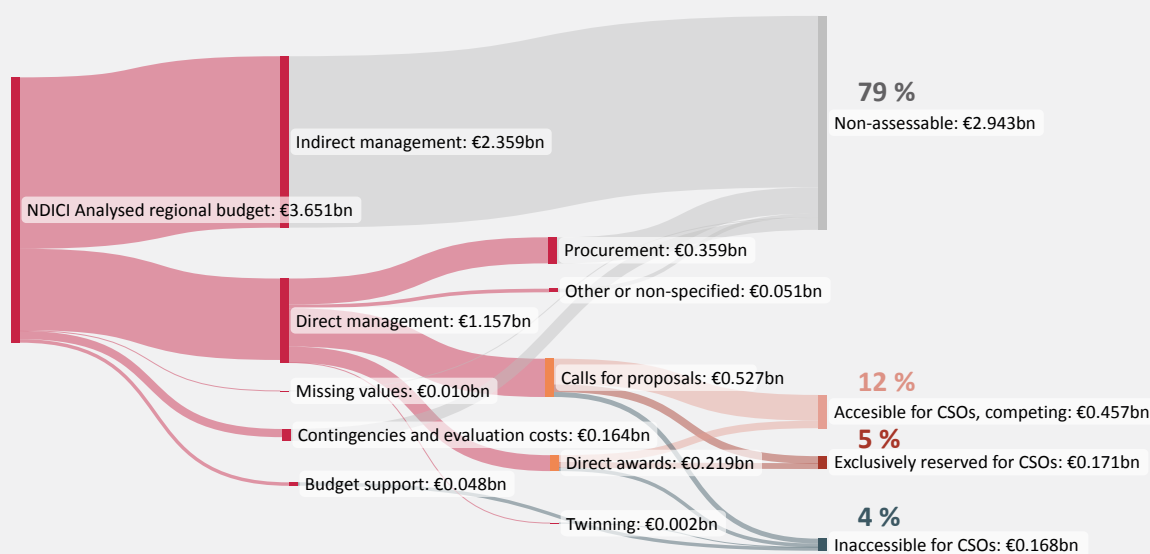


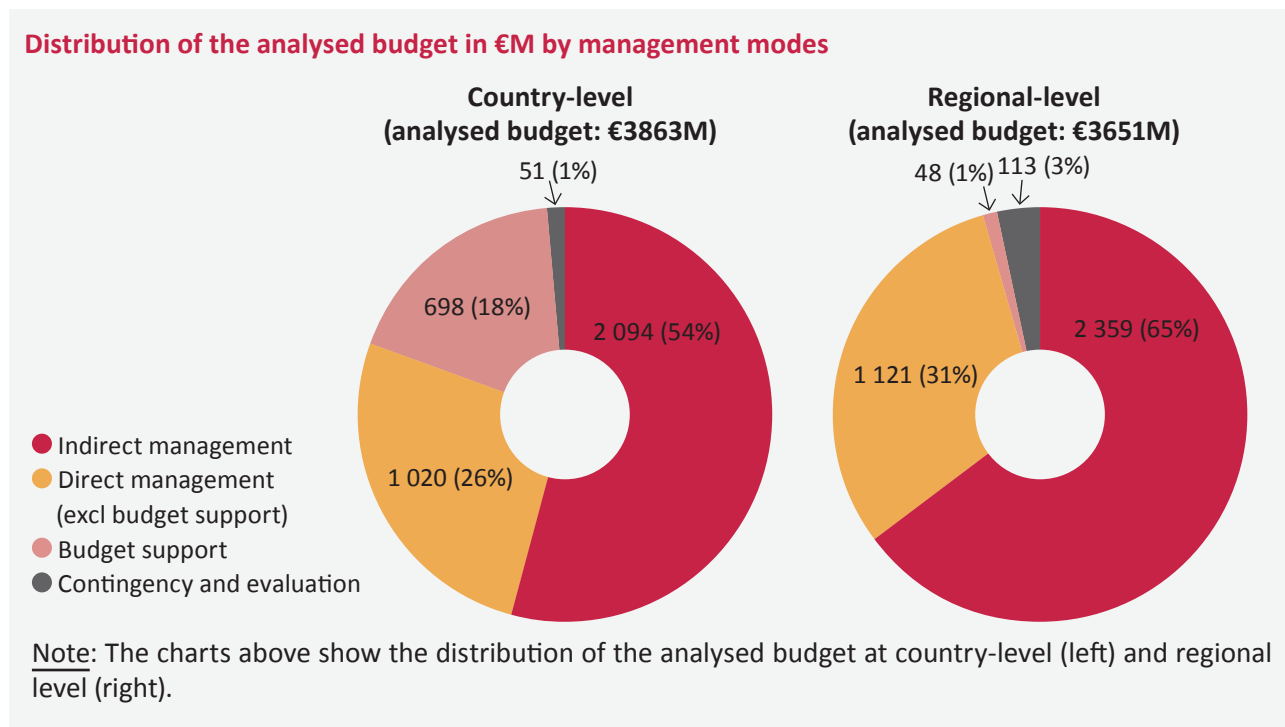
Figure 12: Overview of the distribution of the regional analysed budget in €bn



Non-assessable: Budget spent through specific modes (indirect management) or modalities (procurement, contingencies, evaluations) which do not allow for an analysis of funds going to or through CSOs.

Exclusively reserved for CSOs: Budget explicitly and exclusively going to or through CSOs (through calls for proposals and direct awards). **Partially or possibly accessible to CSOs, competing with other stakeholders:** Budget spent through calls for proposals and direct award procedures for which CSOs are eligible but compete with other stakeholders (public institutions, Member State international cooperation agencies, universities, etc.). **Inaccessible:** Cumulative amount of funding spent through (i) specific modalities (budget support, twinning) which exclude CSOs and (ii) calls for proposals and direct award procedures for which CSOs are explicitly ineligible, because other stakeholders are targeted.

5.8.3 Distribution of analysed budget in €M by management modes

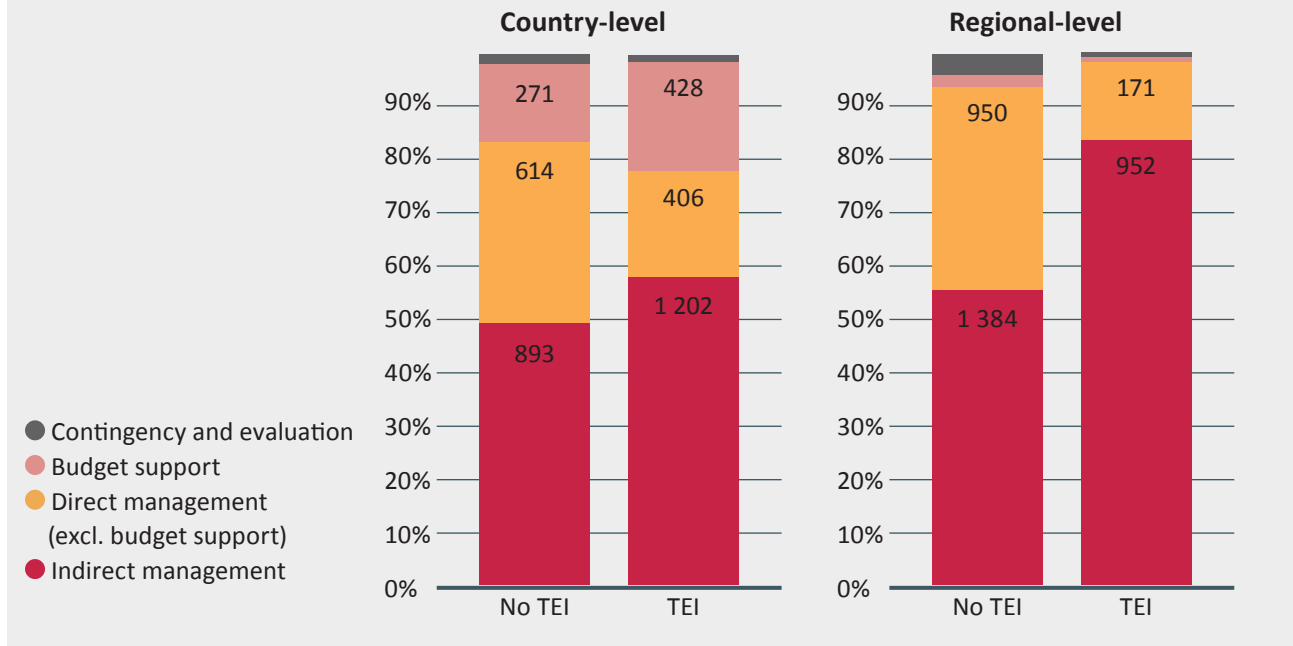


5.8.4 Action plans and measures as part of TEIs

Number of action plans and measures by Team Europe Initiatives (TEI)	Country action plans and measures	Regional action plans and measures
No TEI	77 (48%)	73 (63%)
TEI	85 (52%)	43 (37%)
Total	116 (100%)	162 (100%)

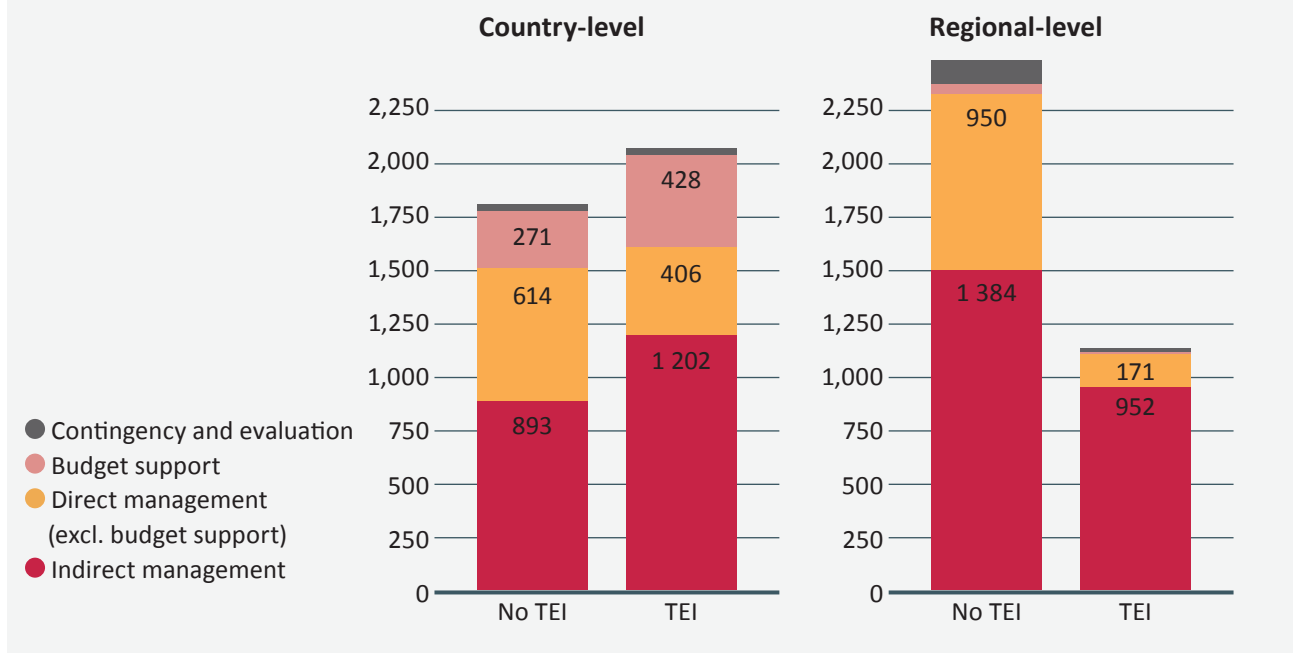
5.8.5 Comparison of management modes between TEIs and non-TEIs [relative distribution in €M, 100% stacked]

Budget distribution in €M by TEIs with stacked management modes (100%)



5.8.6 Comparison of management modes between TEIs and non-TEIs [distribution in €M]

Budget distribution in €M by TEIs and management modes

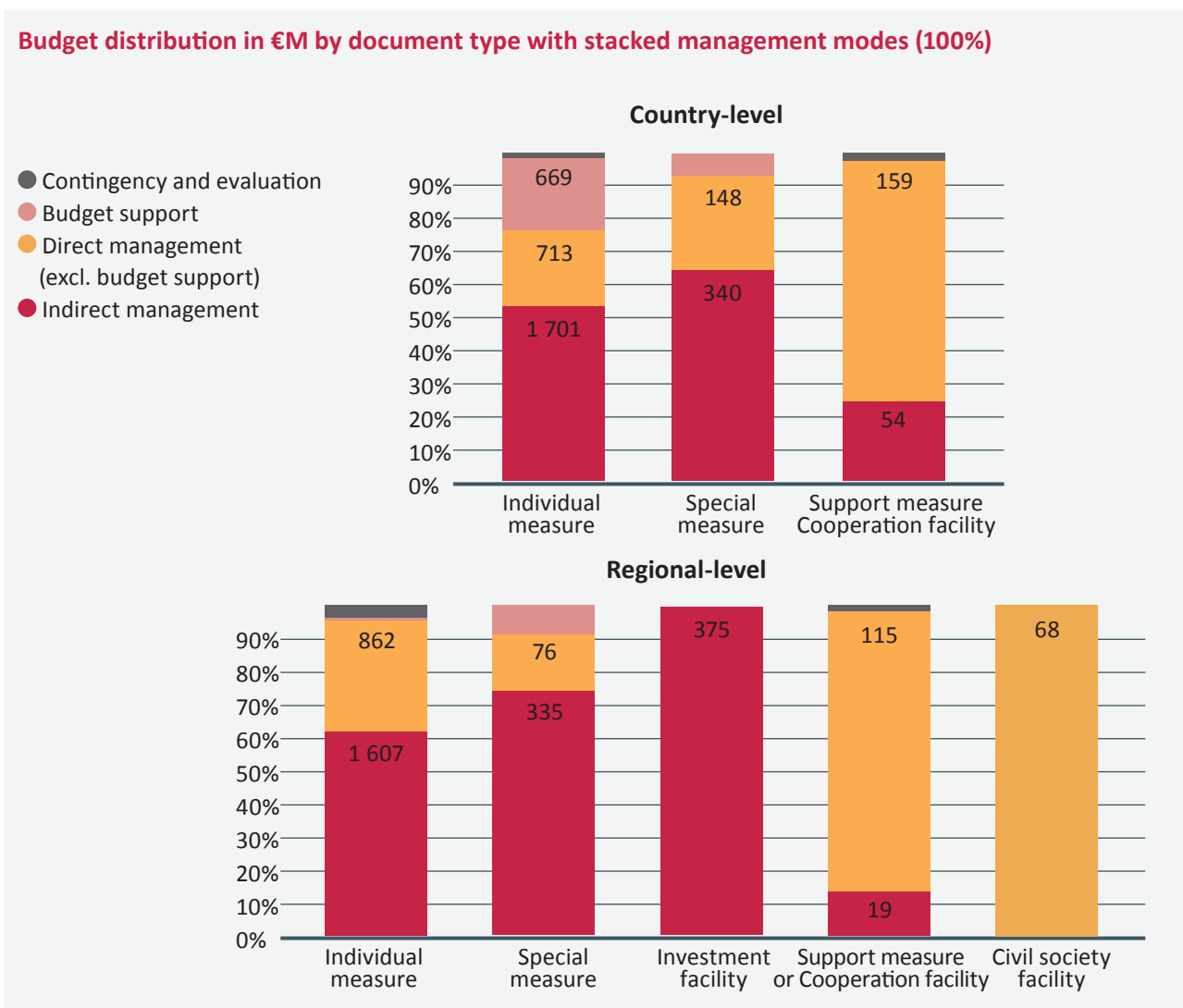


5.8.7 Overview of documents analysed by action type

	Country	Regional	Total
Individual measure	123	97	220
Support measure or Cooperation facility	20	12	32
Special Measure	19	3	22
Civil society support measure	-	2	2
Investment facility	-	2	2
Total	162	116	278

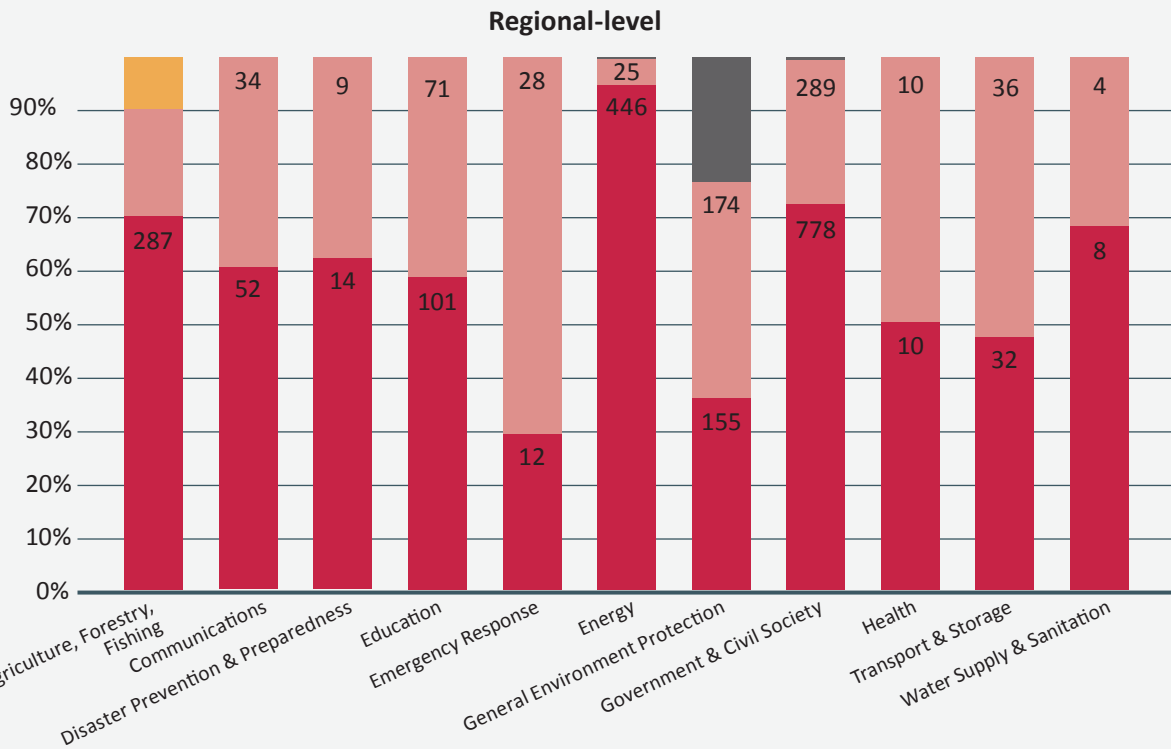
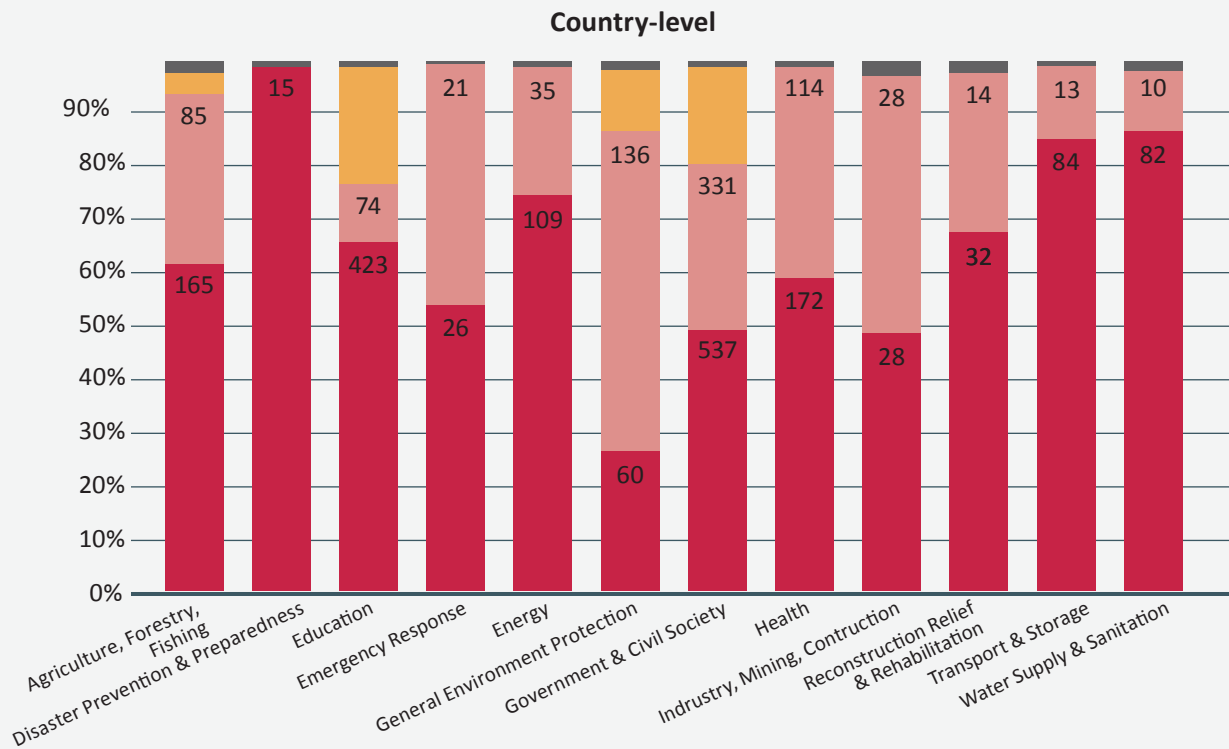
5.8.8 Comparison of management modes between action plan and measure document types

Budget distribution in €M by document type with stacked management modes (100%)



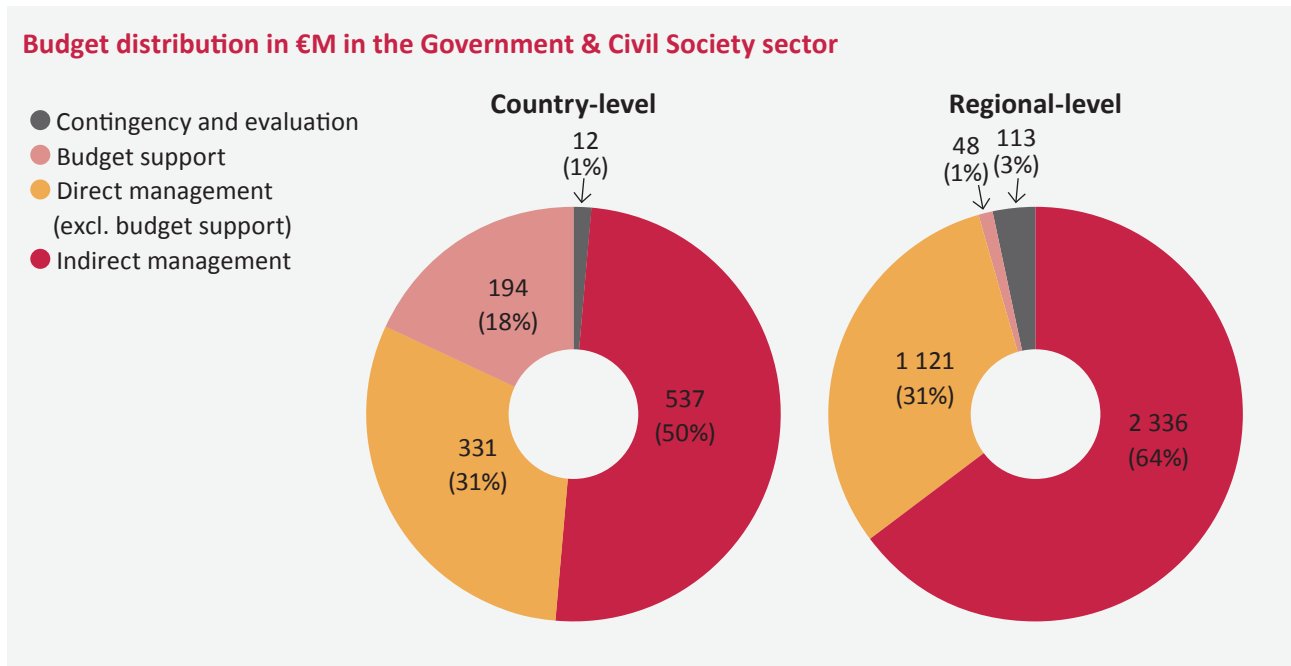
5.8.9 Management modes across a sample of key sectors

Budget distribution in €M by sectors and management modes

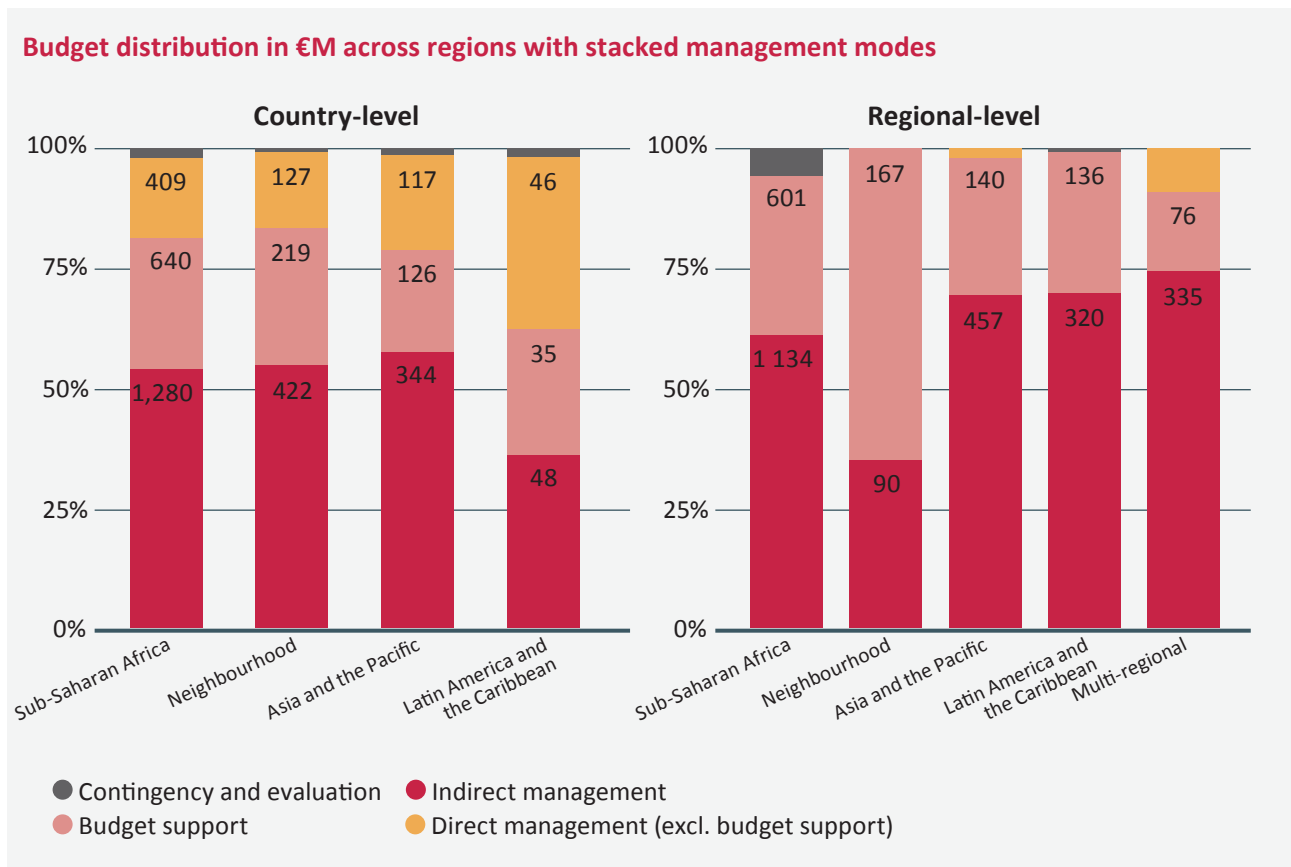


● Contingency and evaluation
 ● Indirect management
● Budget support
 ● Direct management (excl. budget support)

5.8.10 Management modes in the Government & Civil Society sector (DAC code 150)

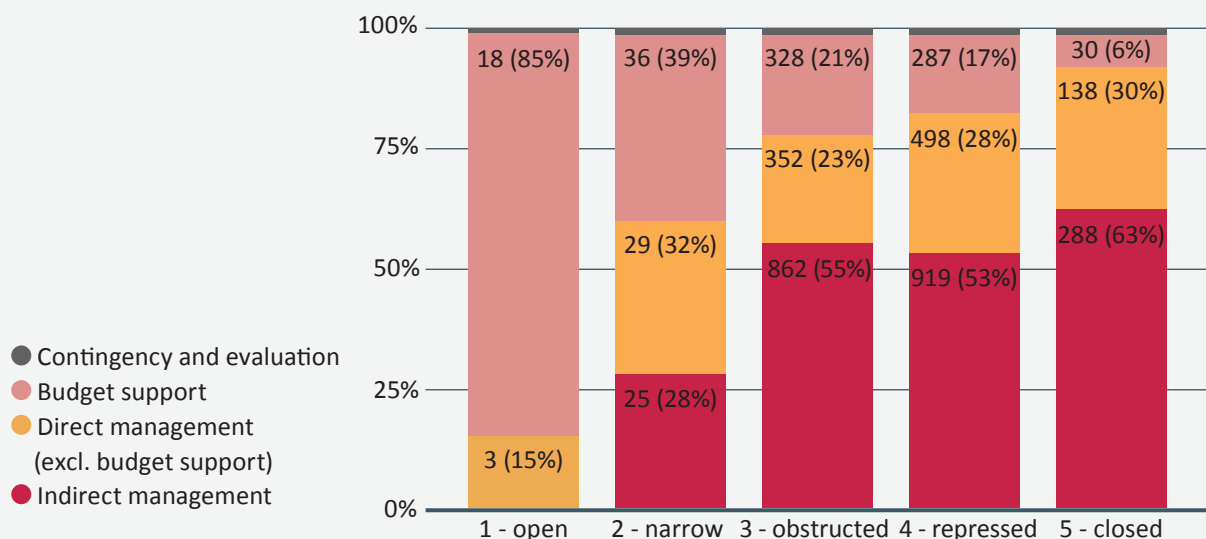


5.8.11 Management modes across regions



5.8.12 Comparison of management modes between civic spaces [country-level only]

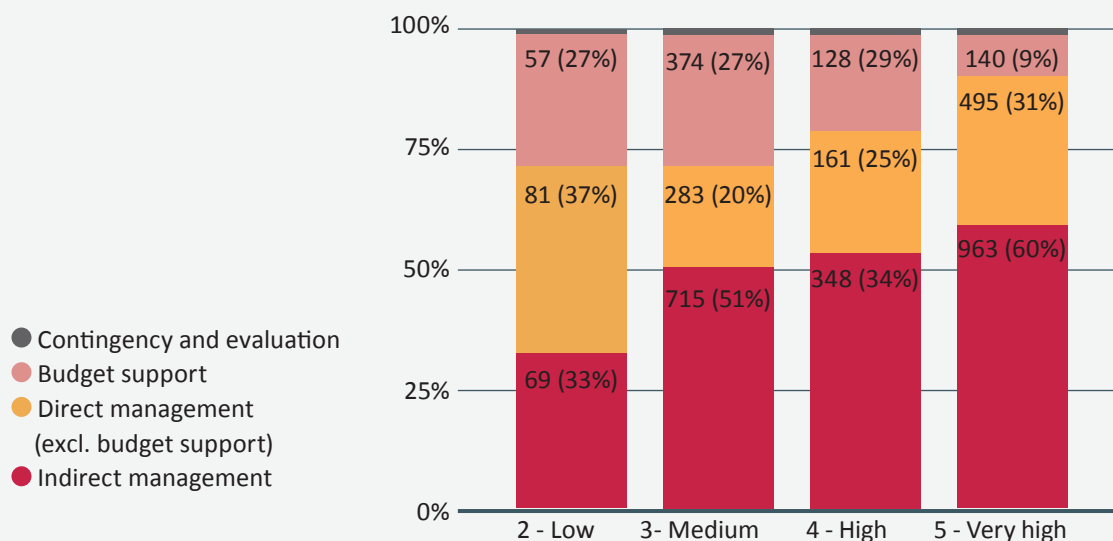
Budget distribution in €M across civic spaces based on the CIVICUS civic space rating with stacked management modes (100%) [country-level only]



	Indirect management	Direct management (excl. budget support)	Budget support	Contingency and evaluation budget
1 - open	0.0%	14.5%	84.8%	0.7%
2 - narrow	27.6%	31.9%	39.2%	1.3%
3 - obstructed	55.3%	22.6%	21.1%	1.0%
4 - repressed	53.0%	28.7%	16.5%	1.7%
5 - closed	62.8%	29.9%	6.5%	0.8%

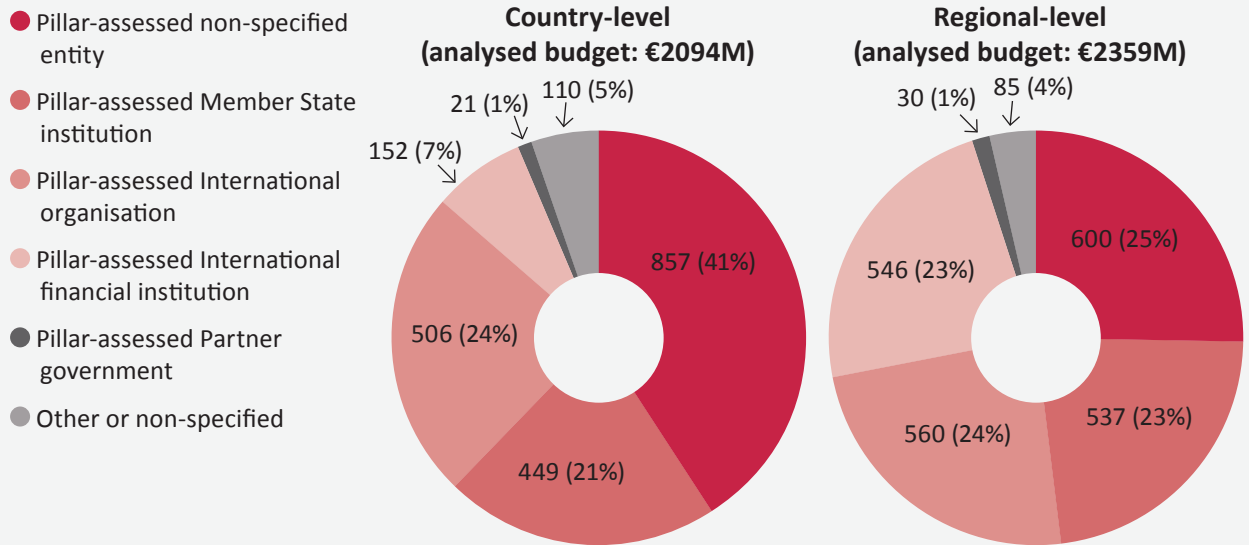
5.8.13 Management modes in crisis-affected countries [country-level only]

Budget distribution in €M across non/crisis-affected contexts (EC INFORM Risk Index) with stacked management modes (100%) [country-level only]



5.8.14 Implementing partners under indirect management

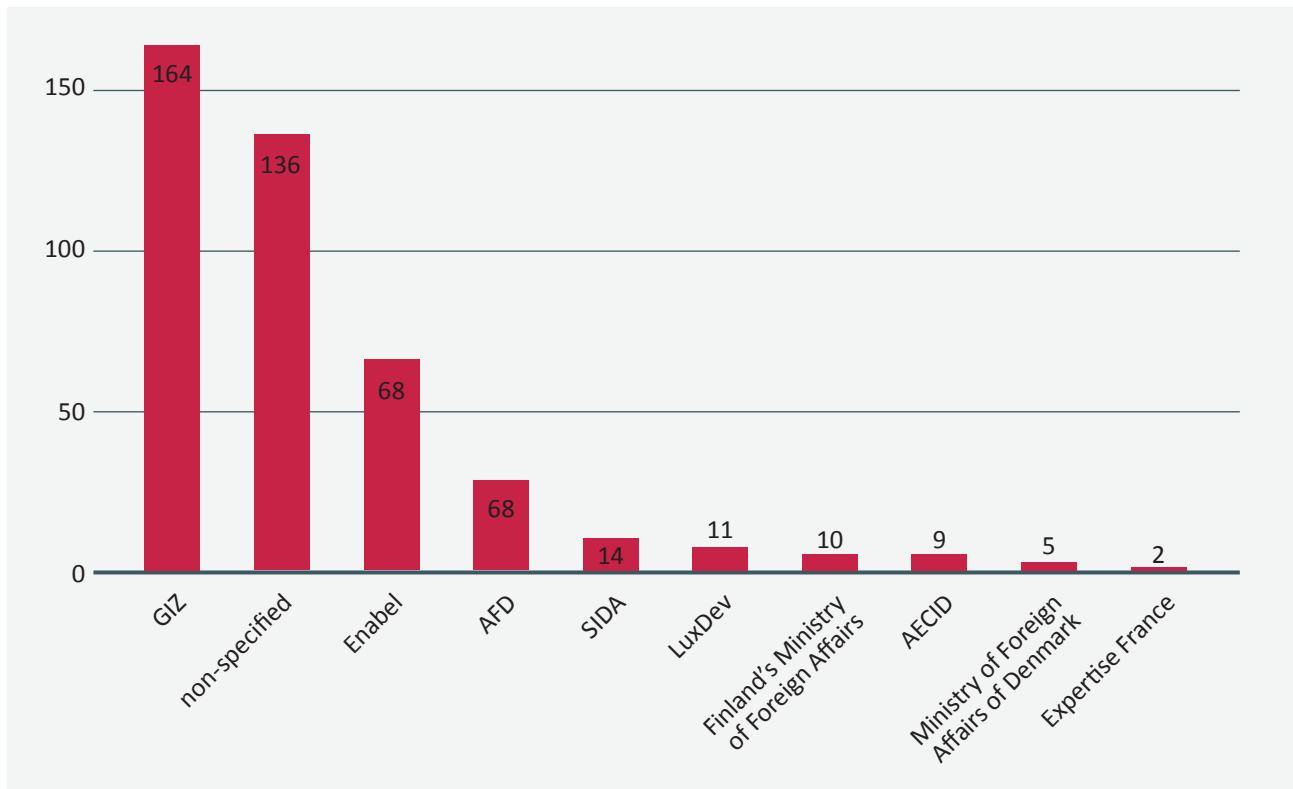
Indirect management budget distribution in €M by implementing partners [detail]



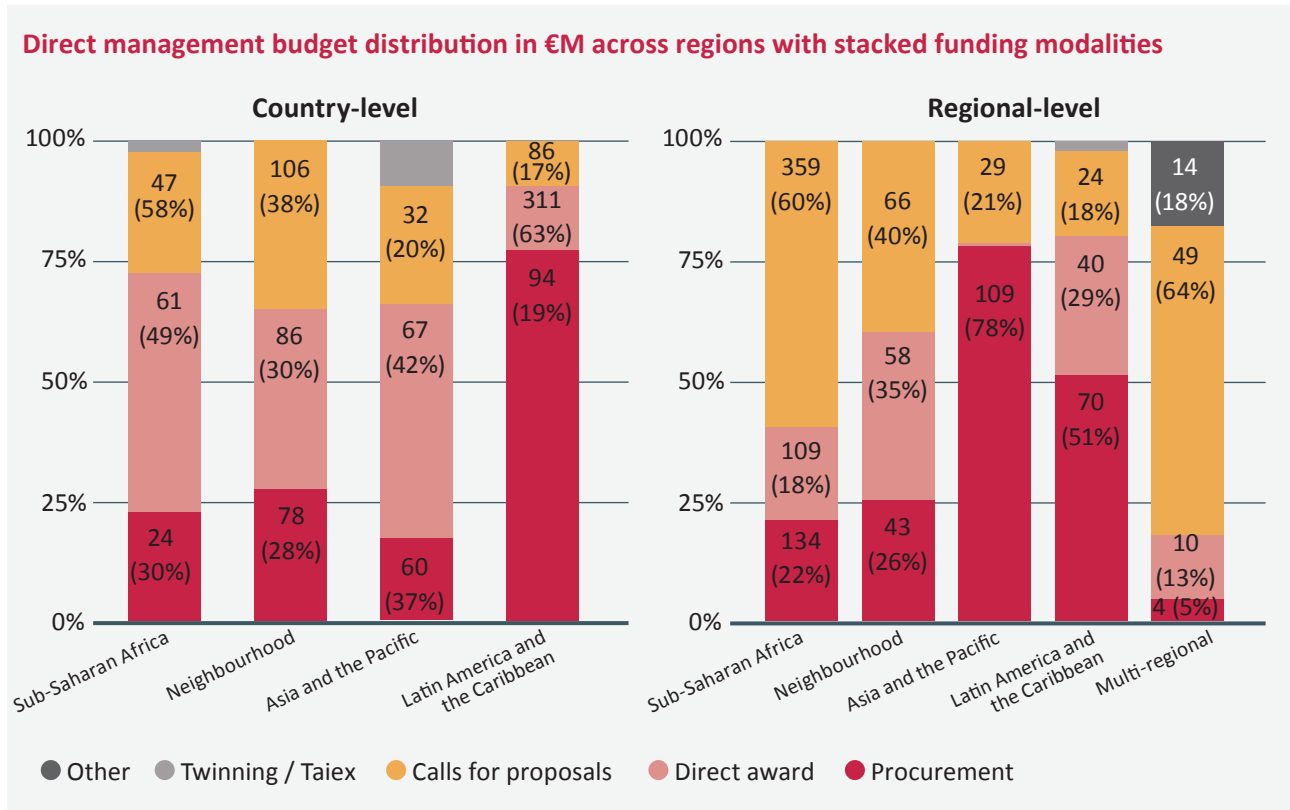
Note 1: The two charts above show the distribution of the analysed budget which is indirectly managed, at country-level (left) and regional level (right), by different implementing partners.

Note 2: Pillar-assessed entities encompass a range of institutions that have been assessed and certified for their financial capacities. While action plans and measures sometimes specify the type of implementing partner (international organisation, Member State international cooperation institution, etc.), many refer to the non-specific term “pillar-assessed entity”.

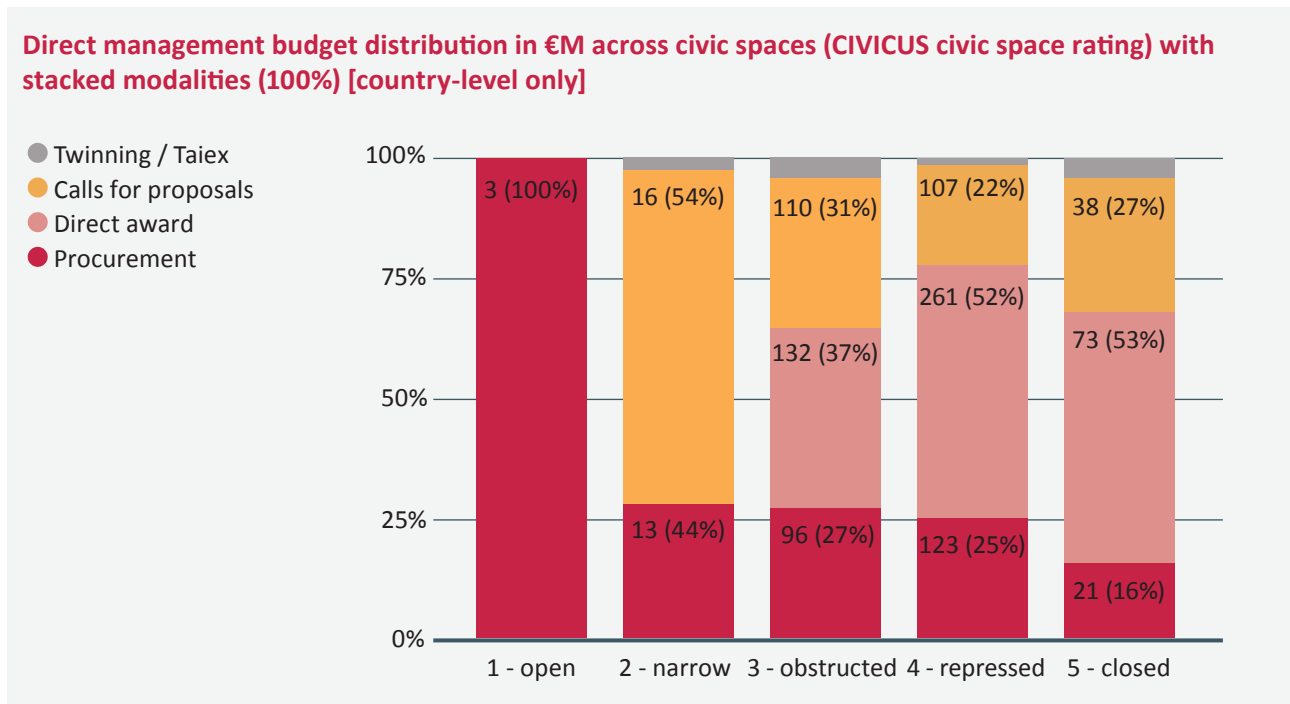
5.8.15 Member State implementing partners under indirect management



5.8.16 Funding modalities under direct management across regions



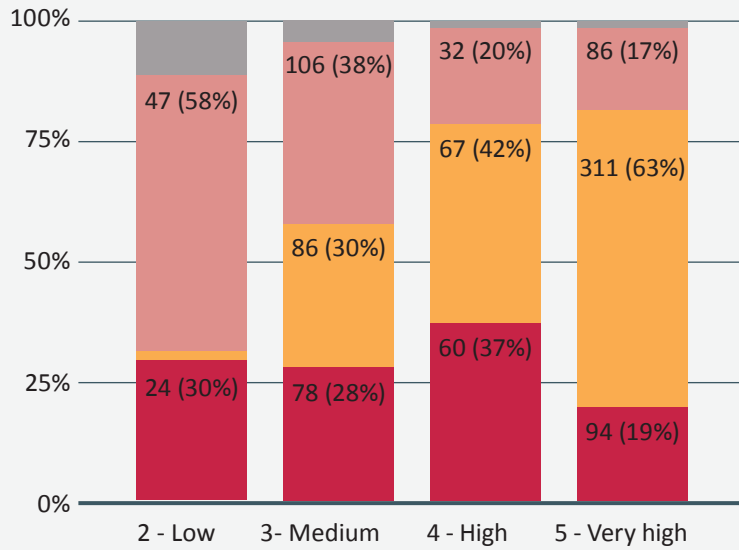
5.8.17 Comparison of funding modalities under direct management between civic spaces [country-level only]



5.8.18 Comparison of funding modalities under direct management in crisis-affected contexts [country-level only]

Direct management budget distribution in €M across non/crisis-affected contexts (EC INFORM Risk Index) with stacked modalities (100%)

- Twinning / Taixex
- Calls for proposals
- Direct award
- Procurement



5.9 List of regional programmes included in the study offering funding opportunities for CSOs through calls for proposals (in €M)

Title of the action plan or measure included in the study	Region	CfP Budget in €M	Eligible organisations	Amount exclusively reserved for CSOs	in %	Amount accessible to CSOs, competing with other stakeholders	In %	Percentage inaccessible to CSOs
Action Document for Prottasha II: Sustainable reintegration of Bangladeshi returnees and improved migration governance	Asia and the Pacific	16.00	Applicants should be legal persons, national or international NGOs or CSOs based in Bangladesh	16.00	100%	0.00	0%	0%
Action Document for the multiannual support measure and cooperation facility for Asia and the Pacific 2022-2024	Asia and the Pacific	9.43	Public bodies of the partner countries; non-profit organisations (including umbrella organisations) and networks relevant to public diplomacy initiatives.	0.00	0%	9.43	100%	0%
Action Document for EU-ASEAN Sustainable Connectivity Package	Asia and the Pacific	4.00	Legal entities, public and private sector organisations, CSOs legal entities, natural persons or groupings without legal personality; local authorities, public bodies, international organisations, NGOs, economic operators such as SMEs.	0.00	0%	4.00	100%	0%
Action Document - Support Measures (Cooperation Facility) Bolivia, Colombia, Ecuador, Paraguay, Peru	Latin America and the Caribbean	1.00	EU Member States, in the case of twinning grants; Local authorities and/or public bodies representing local authorities, international organisations, NGOs, economic operators such as SMEs	0.00	0%	1.00	100%	0%
Action Document for EU-LAC Digital Alliance	Latin America and the Caribbean	14.00	Legal person and be established in Member States of the EU or in a country eligible under the Neighbourhood, Development and International Cooperation Instrument-Global Europe (NDICI-Global Europe).	0.00	0%	14.00	100%	0%
Action Document for Five Great Forests of Mesoamerica	Latin America and the Caribbean	5.00	International NGOs	5.00	100%	0.00	0%	0%
Action Document for the Amazon Basin Green Transition Initiative	Latin America and the Caribbean	5.00	Local authorities, public bodies, international organisations, NGOs, business organisations and/or economic operators such as SMEs.	0.00	0%	5.00	100%	0%

Action Document for Eastern Partnership Civil Society Facility for Resilient and Inclusive Societies	Neighbourhood	42.30	Organisations that have signed a FFPA with the EU or other CSOs	42.30	100%	0.00	0%	0%
Action Document for Civil Society Facility Southern Neighbourhood 2021	Neighbourhood	11.00	Legal entities that qualify as civil society organisations	11.00	100%	0.00	0%	0%
Action Document for Support to post-COVID-19 Economic Recovery	Neighbourhood	10.00	Legal entities; natural persons or groupings, international organisations, NGOs, economic operators such as enterprises and business support structures	0.00	0%	10.00	100%	0%
Action Document for "NaturAfrica Phase 1"	Sub-Saharan Africa	127.45	NGO, (private) economic operators, public sector operators, local authorities and international (intergovernmental) organisations as defined by Article 156 of the EU Financial Regulation	0.00	0.00	127.45	100%	0.00
Action Document « Programme régional d'appui au développement de l'économie pastorale en Afrique de l'Ouest et au Sahel – PRADEP-AOS »	Sub-Saharan Africa	51.50	NGOs, public sector operators, local authorities and international (intergovernmental) organisations	0.00	0%	51.50	100%	0%
Action Document for "Peaceful and resilient borderlands"	Sub-Saharan Africa	34.00	Legal entities, NGOs (both local and international), local authorities, economic operators such as SMEs and international organisations.	0.00	0%	34.00	100%	0%
Action Document for "EU Regional project to provide durable solutions for the Burundian refugee crisis in the Great Lakes Region"	Sub-Saharan Africa	28.00	Lead applicants may be international NGOs, international organisations or Member State Organisation. Co-applicants of the actions may be from the category listed above, as well as NGOs, local CSOs or local authorities.	0.00	0%	28.00	100%	0%
Action Document for "Scientific and Technological Support to Regional Centres of Excellence related to Green Transition"	Sub-Saharan Africa	22.00	Regional Centres of Excellence (RCoE); scientific, technical and/or research observatory, institute, university, association, public authority, intergovernmental organisation, NGO, or network of one or several types of the above actors	0.00	0%	22.00	100%	0%
Action Document for the "Regional support to Youth in Africa"	Sub-Saharan Africa	18.00	Consortia of specialised, NGOs, public bodies, international organisations, associations of local authorities, and economic operators such as small and medium enterprises.	0.00	0%	18.00	100%	0%
Action Document for "Africa Trade Competitiveness and Market Access"	Sub-Saharan Africa	9.00	(i) Business support organisations (BSOs) or Business promotion organisations (BPOs) in Sub-Saharan Africa and (ii) EU Member States administrations and their mandated quality and standards bodies	0.00	0%	0.00	0%	100%

Action Document for "Support the Harmonisation of Pan-African Electoral Capacities"	Sub-Saharan Africa	10.00	Mainly specialised international NGOs, international organisations, and economic operators such as SMEs	0.00	0%	10.00	100%	0%
Action Document for Intra-Africa Academic Mobility Scheme V	Sub-Saharan Africa	55.00	Calls for proposals offering a critical mass of scholarships and traineeships to the next generation of African students	0.00	0%	0.00	0%	100%
Action Document for Institutional support in the domain of the governance of road transport	Sub-Saharan Africa	4.00	NGOs or networks of NGOs	4.00	100%	0.00	0%	0%
Action Document for "The regional project on Peace and Security in the Great Lakes Region – Phase II"	Sub-Saharan Africa	2.00	Lead applicants may be international NGOs.	2.00	100%	0.00	0%	0%
Action Document for Food Production and Resilience of Food Systems in African, Caribbean and Pacific (ACP) countries; ANNEX 1 of the Commission Decision on the financing of a special measure for 2022 for the EU response to the food security crisis and economic shock in African, Caribbean and Pacific countries following Russia's war of aggression against Ukraine	Multi-regional	48.60	CfPs exclusively reserved for CSOs in DRC and Somalia, CfPs accessible to CSOs in Cote d'Ivoire, Rwanda	29.00	60%	19.61	40%	0%

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FURTHER READING

We have compiled the following resources which provide further information about the monitoring and implementation of NDICI-Global Europe:

- https://multimedia.europarl.europa.eu/en/webstreaming/deve-committee-meeting_20221026-1030-COMMITTEE-DEVE
- <https://ecdpm.org/work/catching-up-with-global-europe-15-questions-on-the-eus-new-financial-instrument-answered>
- <https://www.oecd.org/dac/civil-society-engagement-in-development-co-operation.htm#:~:text=Adherents%20to%20the%20DAC%20Recommendation,CSO%20effectiveness%2C%20transparency%20and%20accountability>
- <https://iatistandard.org/en/>
- https://commission.europa.eu/aid-development-cooperation-fundamental-rights/human-rights-non-eu-countries/ensuring-aid-effectiveness/aid-transparency_en
- https://euaidexplorer.ec.europa.eu/explore/recipients_en
- <https://concordeurope.org/resource/7-practices-for-civil-society-participation-in-eu-decision-making/>
- <https://www.europarl.europa.eu/legislative-train/theme-an-economy-that-works-for-people/file-revision-of-the-financial-regulation>

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