



# **External Evaluation of the 11<sup>th</sup> European Development Fund (EDF) (2014 – mid 2017)**

**Final Report**

**June 2017**

This report has been prepared by



Consortium composed of  
DAI, Mokoro, GEOtest, ICF International, HCL, Technopolis, Europe Limited, ETI Consulting

Leader of the Consortium: DAI  
Contact Person: Francesca Giordano  
Team comprised:

Muriel Visser (Team Leader) (Mokoro)  
Karolyn Thunnissen (Mokoro)  
Javier Pereira (GEOtest)  
Paolo Scalia (DAI)  
Ana García Femenía (GEOtest)  
Fran Girling (Mokoro)

**FWC COM 2015**

**EuropeAid/137211/DH/SER/Multi  
Specific Contract No°2015/368452**

## **External Evaluation of the 11<sup>th</sup> European Development Fund**

**This evaluation was commissioned by the Evaluation Unit of the  
Directorate-General for International Cooperation and  
Development (European Commission)**

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## List of Acronyms

AAA	Accra Agenda for Action
AAP	Annual Action Plan
ABAC	Accrual Based Accounting
ACP	Africa, Caribbean, Pacific
ACPs	ACP states
AD	Action Document
AfDB	African Development Bank
AfIF	African Investment Facility
APF	African Peace Facility
BS	Budget Support
CAR	Caribbean
CBSS	Country Based Support Scheme
CCM	Country Coordinating Mechanism (of GFATM)
CIF	Caribbean Investment Facility
CIR	Common Implementing Regulation
CoA	Court of Auditors
Concord	European NGO confederation for relief and development
CPA	Cotonou Partnership Agreement
CPF	Country Partnership Framework (of IDA)
CPIA	Country Policy and Institutional Assessment (rating) (of IDA)
CRIS	Common RELEX Information System
CRS	Common Reporting Standard
CS	Civil society
CSO	Civil Society Organisation
CSP	Country Strategy Paper
DAC	Development Assistance Committee (of OECD)
DCI	Development Cooperation Instrument
DEVCO	Directorate-General for International Cooperation and Development
DG	Directorate General
DG NEAR	DG for Neighbourhood countries
DMRO	Duly mandated regional organisations
DP	Development Partner
DRC	Democratic Republic of the Congo
DRM	Domestic Revenue Mobilisation
DWH	Data warehouse
EAC	East African Community
EAMR	External Assistance Management Report
EC	European Commission
ECHO	Humanitarian Aid and Civil Protection Department of the European Commission
EDF	European Development Fund
EEAS	European External Action Service
EEC	European Economic Community
EFI	External Financing Instrument
EIB	European Investment Bank
EIDHR	European Instrument for Democracy and Human Rights
ENI	European Neighbourhood Instrument
ENP-E	European Neighbourhood Policy East
ENP-S	European Neighbourhood Policy South
ENPI	European Neighbourhood Policy Instrument
EODF	The European Overseas Development Fund
EPA	Economic Partnership Agreement
EQ	Evaluation Question
ENRTP	Thematic Programme for Environment and Sustainable Management of Natural Resources including Energy
ERDF	European Regional Development Fund

ESA-IO	East and Southern Africa and Western Indian Ocean
EU	European Union
EU-AITF	EU Africa Infrastructure Trust Fund
EUD	European Union Delegation
GBS	General Budget Support
GBV	Gender-Based Violence
GCCA	Global Climate Change Alliance
GD	Greenland Decision
GDP	Gross Domestic Product
GFATM	The Global Fund to Fight AIDS, Tuberculosis and Malaria
GNI	Gross National Income
GPGC	Global Public Goods and Challenges
COMESA	Common Market for Eastern and Southern Africa
GRZ	Government of the Republic of Zambia
GTP	Growth and Transformation Plan (Ethiopia)
HDI	Human Development Index
HoD	Head of Delegation
HQ	Headquarters
HR	Human Rights / Human Resources
I	Indicator
IcSP	Instrument contributing to Stability and Peace
IDA	International Development Association
IFP	Investment Facility for the Pacific
IfS-RRM	Instrument for Stability and Rapid Reaction Mechanism
IGAD	Intergovernmental Authority on Development
IL	Intervention Logic
INSC	Instrument for Nuclear Safety Cooperation
IPA	Instrument for Pre-Accession
IR	Inception Report
ISC	Inter-Service Commission
ISG	Interservice Group
IW	Internal Workstream
JASZ	Joint Assistance Strategy for Zambia
JC	Judgment Criterion
JP	Joint Programme
KPI	Key Performance Indicator
LA	Local Authorities
LDC	Least developed country
LFA	Local Fund Agent (of GFATM)
LIC	Low income country
LMIC	Lower-middle income country
M&E	Monitoring and evaluation
M&R	Monitoring and reporting
MAR	Multilateral Aid Review
MDG	Millennium Development Goal
MFF	Multiannual Financial Framework
MIC	Middle income country
MIP	Multi-annual indicative programme
MN	Meeting Notes
MS	Member State
MTE	Mid-Term Evaluation
MTR	Mid-Term Review
NAO	National Authorising Officer
NDP	National Development Plan
NIP	National Indicative Programme
NSA	Non-State Actor
OAD	Overseas Association Decision
OCTA	Association of the Overseas Countries and Territories of the European Union

OCTs	Overseas Countries and Territories
ODA	Official Development Assistance
OECD-DAC	Organisation for Economic Cooperation and Development/Development Assistance Committee
OPC	Open Public Consultation
OPTIMUS	OPTimising Implementing Modalities and Use of DEVCO Staff in EU Delegations
PAF	Performance Assessment Framework
PALOP	Organisation of African Countries of Portuguese Official Language
PBS	Promotion of Basic Services (programme) (Ethiopia)
PC	Partner Country
PCD	Policy Coherence for Development
PFM	Public Financial Management
PI	Partnership Instrument
PRAG	Practical guide on contracting procedures applying to all EU external actions financed from the EU General Budget and the EDF
PRBS	Poverty Reduction Budget Support
PSD	Private Sector Development
PSNP	Productive Safety Nets Programme (Ethiopia)
QE	Quality Expert
QSG	Quality Support Group
R&I	Research and Innovation
RAO	Regional Authorising Officer
RIP	Regional Indicative Programme
RO	Regional Office
ROM	Results-Oriented Monitoring
RSP	Regional Strategy Paper
SADC	Southern African Development Community
SBC	Stated Building Contract
SCD	Systematic Country Diagnostic (of IDA)
SDG	Sustainable Development Goal
SG	Steering Group
SPSP	Sector Policy Support Programme
SWG	Sector Working Group
TA	Technical assistance
TAO	Territorial Authorising Officer
TBL	Thematic Budget Line
TF	Trust Fund
TFEU	Treaty on the Functioning of the European Union
TOR	Terms of Reference
TVET	Technical and Vocational Education and Training
UNFCCC	United Nations Framework Convention on Climate Change
UNFPA	United Nations Population Fund
UNICEF	United Nations Children's Fund
VAT	Value Added Tax
WB	World Bank

# Executive Summary

## Objectives, parameters and context of the review

This performance review of the European Development Fund (EDF) examines the fitness for purpose of EDF11 with Council regulation 2015/322 on the implementation of the 11<sup>th</sup> EDF. The EDF focuses on economic, social and human development as well as regional cooperation and integration and is one of nine External Financing Instruments (EFIs)<sup>1</sup> of the European Union (EU). It is governed by the political framework of the Cotonou Partnership Agreement (CPA) between EU Member States (MS) and African, Caribbean and Pacific (ACP) countries (79 in total). The EDF11 started in 2014 and runs until 2020 (the end date for the present Cotonou agreement); its total financial resources amount to €30.5 billion. It is financed by direct contributions from EU MS outside the EU budget and is covered by its own legal financial and implementation rules.

The objectives of the review are: a) to provide the relevant external relations services of the EU and the wider public with an independent assessment of the EDF, including potential and actual complementarities and synergies with each of the other EFIs of the EU; b) to inform the programming and implementation of the current EDF, as well as of the next generation of EFIs. The performance review covers: bilateral support to ACP countries, regional cooperation, intra-ACP cooperation, and support to 25 Overseas Countries and Territories (OCTs). The OCTs are eligible for EDF support under a separate Overseas Association Decision, and account for a very small share of the EDF budget. To ensure its alignment with the other ongoing EFI evaluations, this review took place very early in EDF11, when most of the programmes it finances had yet to start.

This performance review followed a rigorous approach based on a reconstructed EDF intervention logic and testing the assumptions associated with the expected changes. The evaluation approach maximized the use of available secondary information, analysing more than 2000 documents, undertaking quantitative analysis of international and European Commission data bases, and collecting primary data through over 300 interviews, 39 responses to a survey of EU Delegations in ACP countries, 125 responses to the on-line Open Public Consultation (OPC) survey on the EDF and eight OPC meetings with various stakeholders as well as eight country visits. An in-depth analysis was done for a sample of 25 countries. Given the early stage in EDF11 implementation, findings about the likely effectiveness of EDF11 are largely extrapolated from evaluations and reviews of EDF10, and triangulated, where feasible, with external stakeholders.

## Responses to evaluation questions, conclusions and recommendations

**Findings on Relevance (EQ1):** From the perspective of the beneficiaries, the EDF11 programming design remained highly relevant to poverty eradication, the Millennium Development Goals and aid effectiveness principles. It responded to broad country needs and priorities and continued to show its relevance through long-term, predictable funding which is a valuable feature of the EDF. EDF support to the OCTs has served its purpose well in being consistent with the objectives of the association between the OCTs and the EU. However, strong headquarter-driven agendas saw EDF11 responding less to country preferences when compared to EDF10 and despite wide consultations the influence of stakeholders was reduced. Responding to emerging priorities of the EU agenda has fallen on the Trust Fund (TF) for Africa, mainly financed from the EDF reserves, but its modalities risk undermining the fundamental EDF principles of partnership and effectiveness.

**Findings on Effectiveness (EQ2) and efficiency (EQ3):** The EDF has achieved important outcomes and has played an important role in addressing poverty reduction and the MDGs, although evidence for the regional level is weaker. Most elements are in place for EDF11 to deliver (procedures, guidelines, management). Efforts have been made to improve results reporting; however, this remains at the output level, and continued weakness in this area constrains the EDF's effectiveness, and reduces accountability and lesson learning. Sustainability of outcomes is also found to be at risk, linked to lack of Partner Country (PC) Government commitment to reforms, poor results focus and monitoring, and the absence of EU exit strategies when a sector is no longer supported.

Efforts have been made under EDF11 to streamline procedures; selected efficiency gains have been achieved, with indications of a reduced planning cycle and improved budget management. The EDF's complex structure has not been radically transformed, and procedures continue to be burdensome – for OCTs, in particular, they are a major barrier to efficiency and effectiveness.

In terms of delivery, the EDF is challenged to flexibly adapt to the very different needs and nature of the groups of ACP and OCT countries. This raises issues about the one-size-fits-all approach that characterizes the choice of procedures and modalities. It ultimately raises questions about the territorial scope of the EDF. Delivery is also affected by the National Authorizing Officer (NAO) structure which, while offering the advantage of bringing the EDF close to government, is often perceived as blocking cooperation implementation and wider ownership.

**Findings on added value (EQ4) and complementarity (EQ5):** The EDF has characteristics that give it an added value compared to MSs and Development Partners (DPs). These include: size, geographical scope, the medium-term horizon and predictability, partnership, ownership, and the range and weight of financial modalities. The size of the EDF allows it to play a role in regions, countries, sectors and priorities that is different from other EFIs and MSs/DPs. The EDF also gives a presence and represents interests of the EU in countries where (many) other donors are not present and in regions where EU has territories. The EDF presents a specific added value due to the relevance of Budget Support (BS) (much appreciated by MSs and DPs), and the possibility of combining different modalities and management modes.

The EDF's coherence at country level has improved through sector concentration. In principle both EDF regional and intra-ACP support add value, given that few other players are equipped to intervene at a supranational level. Some opportunities have been grasped, for example with the African Peace Facility. However, overall the EDF struggles to make the most out of this potential added value and to coordinate and maximize synergies between the different levels.

Overall the EFIs complement areas where the EDF falls short because of its specific characteristics (such as its long programming horizon and the requirement to agree the use of funds with the recipient Government). However, different decision and management centres reduce the potential complementarity of the EFIs; insufficient accountability produces inefficiencies in their management; both put a burden on the Delegations, and there are clear areas of overlap with the Development Cooperation Instrument (DCI) which need to be addressed.

**Findings on leveraging and influence (EQ6):** The EDF has tools to leverage additional funds for development but there is limited evidence of success. The need to address new agendas is being translated into new tools, such as trust funds or blending facilities, which are not easy to reconcile with the EDF's core principles of partnership and ownership. Existing evidence suggests that blending mobilised additional finance in approximately 50% of the projects. The EDF has only recently started to provide substantial support to domestic resource mobilisation and results are not yet visible, although BS has contributed to creating structures and incentives which are likely to increase domestic resource mobilisation.

The EDF allows for a unique relationship with political dialogue. The legal basis of the Cotonou Agreement (Article 8) together with the volume of funding and the role of the EU have created space for raising issues. Actual results are often context-specific, depending on internal and external factors. Although dialogue mechanisms have made it possible for sensitive issues to be raised, the EDF has not been strong in advocacy and the response by governments has been chequered. Nevertheless, the EDF has provided an important platform for discussion around regional issues.

**Summary of main conclusions:** The EDF faces pressure to tackle an increasing number of demands, some of which can be difficult to align with the EDF's core values/founding principles of "poverty eradication" and "partnership" with ACP countries. There is a tension between what the EDF was designed to do and what it is expected to do today – with the EDF being asked to deliver on several other EU agendas (in particular security and migration) which are overriding the development agenda. The EDF11 has accommodated some of these new priorities, but there is a real threat that EDF will be pushed into responding to agendas that distance it from its primary objective of poverty alleviation, which are difficult to reconcile with the EDF's core values and compromise what it does well.

As an instrument the EDF has served well, and continues to serve well. It has provided an anchor in a fast-changing environment through its seven-year planning horizon, its continued support and alignment to national needs. The downside of this steadfastness is the rigidity of the EDF, which is insufficiently able to accommodate changes within the seven-year timeframe.

During programming, increased attention has been paid to complementarities, and it is likely that project design processes will limit duplications and increase coordination across instruments and cooperation mechanisms. However, complementarity of EU actions remains challenging, particularly

for centrally managed budget lines. Furthermore, the EDF has not consistently established solid synergies across national, regional and intra-ACP cooperation.

The EDF has a unique acknowledged added value that goes beyond its unmatched size, use of different aid modalities and geographical spread. It promotes EU values, tackles issues at supranational level and is reliable. It has not made the most of its potential position in the aid landscape and has tended to use a one-size-fits-all approach that has not sufficiently taken account of the specificities of some of its partner countries and territories. Partnership principles have been less well applied in EDF11 than in EDF10, sector and modality choices having been directed from Brussels and no further progress has been made on widening partnership to other non-state actors such as cooperatives, political parties, religious leaders, trade unions.

Efficiency measures under EDF11 have produced changes that are likely to alleviate the administrative burden and strengthen financial performance. These changes have had implications for support to civil society organisations (CSOs) and have seen the EDF increasingly occupied with the administration of development cooperation and becoming less of a hands-on player in development. This is likely to have a negative impact on the EU leadership at country level, effectiveness of dialogue, visibility and accountability. Limitations in monitoring and evaluation systems of cooperation outcomes are seriously constraining the EDF's ability to report on effectiveness, and hence its accountability and lesson learning capacities. This is the result of a lack of results orientation and limited capacities. In addition, evaluation arrangements are at times very limited, particularly for regional and intra-ACP cooperation.

## Recommendations

The following recommendations are designed to reinforce the strengths and address the weaknesses that this performance review has identified.

R 1: Restore the spirit of Cotonou's partnership principle by instituting a democratic ownership of EDF programming, implementation and monitoring and ensuring that EDF's modalities and tools are coherent with its core values and principles.

The partnership between the EU and the ACP states is extremely rich and has provided a platform for discussions and support that is unlike that of any other donors. However, under EDF11 it has suffered. The role of the partner countries, territories and regions in the decision-making and implementation of the EDF must be rebalanced to reflect the spirit of the CPA and to ensure alignment with the new European Consensus on Development and with the SDGs.

To achieve this, the level of participatory partnership needs to be significantly strengthened by actively safeguarding and promoting the involvement of the full range of relevant stakeholders in programming, implementation, and monitoring and evaluation, across the range of settings and levels at which the EDF operates. This will require further strengthening of CSOs to involve them and other stakeholders in public policy and advocacy, and for the EU-ACP to review the role of the NAO in EDF management. Restoring the spirit of these important agreements must naturally also extend to tools and implementation modalities available within the EDF, such as the EU TF, blending facilities or delegated cooperation, to ensure that their formal governance and decision-making structures and their modus operandi remain coherent with the instrument's core values and principles.

R 2: Focus efforts on increasing accountability for results and on improving sustainability across all actions funded by the EDF.

To increase the effectiveness of the EDF, the Commission should focus its attention on improving the results-orientation of its EDF cooperation. This implies being more vigilant about how programmes and projects it is funding contribute to poverty reduction and equitable and sustainable growth, with particular attention to ensuring: i) interventions are guided by a strong theory of change, and sound underlying assumptions in country, regional and intra-ACP programming and in project/programme design; ii) greater attention to the monitoring of outputs and outcomes, including monitoring of the theory of change's pivotal assumptions; iii) strengthening of national statistical systems as part of country support so these can support results-oriented management. Sustainability also requires specific attention, in particular ensuring that government is delivering on its commitments to sustainability and that, if it is not, appropriate steps are taken to address this through political and policy dialogue as well as through withdrawal of funding if need be. Sustainability also entails that an exit strategy should be put in place during project design and

factored into the project documents so that during project implementation, there are steps to be taken in case of non-fulfilment of conditions.

R 3: Entrust programming choices to field offices based on a political economy analysis, and ensure that programming can be adapted to evolving needs.

To ensure ownership, adequacy to needs, and to the local country contexts, programming choices should: a) be entrusted to field offices (including when undertaking Joint Programming), b) fully reflect the discussions that have been held at field level, and c) be fully respected by headquarters. More flexibility should also be introduced in the instrument without losing the continuity in sector involvement, the coherence of actions and the predictability of support. To implement this recommendation, a Political Economy Analysis of the PC should be undertaken before launching the programming and updated every three to four years, or more often if necessary. This is to ensure that the dynamic forces behind the strategic direction for development and the constraints and opportunities for long-term reforms are understood and integrated in programming, project/programme design and in political and policy dialogues. Yearly updating would enable commitments to be gradually spread out whilst leaving room to address emerging priorities. This would require flexibility with regards to the number of sectors supported, especially where countries and needs are large, donors limited, and EDF envelopes important.

R 4: Conduct a structured review of the impact of the various programming, implementation and monitoring changes under the EDF11 and take corrective action where necessary.

To further improve the management of the instrument and to ensure its continued relevance and alignment with its founding principles (Ref. R1), the impact of the changes that took place in the EDF11 programming, implementation and monitoring at national, regional and intra-ACP levels, including the simplification measures, need to be systematically assessed and reviewed. The full effects of these changes are not clear but there are indications of selected negative effects, for example on participation and access to EDF funding by CSOs. Reviewing the impact of these measures will ensure that where positive effects have been obtained these are followed up by actions to consolidate the changes and that where no or negative effects have been identified, reasons are investigated and (remedial) action taken accordingly.

R5: Improve complementarity and synergies in the programming and project cycle of the EDF with other instruments, and between the different EU services by entrusting the management of all projects and programmes in ACP countries to EU Delegations.

The EDF is not sufficiently flexible to accommodate all needs and it is not desirable that it should do so. The current set-up where the EDF is complemented by a set of other EFIs works well, and works much better since EU Delegations were given responsibility to manage certain DCI budget lines at field level (for example, local calls for proposals prepared and managed by the EUDs for the budget line related to CSOs and local authorities). However, the continued implementation at national and intra-ACP level of projects and programmes that neither the EU Delegation nor the national authorities have knowledge of is ineffective, inefficient, and even sometimes counter-productive by not being aligned with the agreed priorities and sectors and requiring additional resources to manage. Countries and EU Delegations should therefore be fully aware of all EU-funded interventions in the country, whether or not from EDF: this would include full transparency on uses of delegated funding. They should also have total clarity about respective roles of EU delegations, the Directorate-General for Development Cooperation, the European External Action Service and others in the different stages of the programming and project cycle.

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<sup>1</sup> This includes: The European Neighbourhood Instrument (ENI), The Development Cooperation Instrument (DCI), the Instrument for Pre-Accession Assistance (IPA), the Instrument for Greenland, the European Institute for Democracy and Human Rights (EIDHR), the Instrument for Contributing to Stability and Peace (IcSP), the Partnership Instrument (PI), and the Instrument for Nuclear Safety Cooperation (INSC).

## 1. Introduction

1. This chapter provides a brief overview of the subject of this evaluation, sets out its purpose and scope, and discusses the methodology and its limitations. It is followed by Chapter 2 which discusses findings for each of the evaluation questions. Chapter 3 presents the conclusions and recommendations of the evaluation. Supporting evidence and analysis is provided in Annexes which are cross-referenced in the main text. The full terms of reference (TOR) are provided in Annex 1.<sup>2</sup>

### 1.1 Background and overview of the initiative<sup>3</sup>

2. The European Union (EU) and its member states (MS) are the largest providers of Official Development Assistance (ODA). The European Development Fund (EDF) is the largest single instrument of the EU and one of nine External Financing Instruments (EFIs) (see Table 1 below), a central feature of the international aid architecture, and the world's largest and most advanced financial and political framework for North-South Cooperation.

3. The EDF is also the oldest development cooperation instrument of the EU. The Treaty of Rome, signed in 1957, provided the legal basis for the first EDF, which was launched in 1959. The African, Caribbean and Pacific (ACP)-EU Partnership Agreement<sup>4</sup> modernized the EDF as a development instrument. This agreement covers aid, trade and political relations and puts a strong emphasis on equality, ownership, mutual obligations and dialogue between the partners (currently covering 79 ACP countries).

**Table 1 EFIs and funding 2014–2020**

<b>Geographical Instruments</b>	<b>Funding</b>
European Development Fund (EDF)	€ 30 506 m
Development Cooperation Instrument (DCI)	€ 19 662 m
Of which: <i>Geographic programmes (non ACP)</i>	€ 11 809 m
<i>Thematic programmes</i>	€ 7 008 m
<i>Pan-African programme</i>	€ 845 m
European Neighbourhood Instrument (ENI)	€ 15 433 m
Instrument for Pre-Accession Assistance (IPA)	€ 11 699 m
Instrument for Greenland	€ 217 m
<b>Horizontal Instruments</b>	
European Instrument for Democracy and Human Rights (EIDHR)	€ 1 333 m
Instrument contributing to Stability and Peace (IcSP)	€ 2 339 m
Partnership Instrument (PI)	€ 955 m
Instrument for Nuclear Safety Cooperation (INSC)	€ 225 m

4. The EDF11 is shaped by the policy framework provided by the European Consensus on Development (2005), which emphasizes human rights and good governance as important objectives of EU cooperation. Its priorities and programming incorporate key principles that stem from EU policies and initiatives, such as the **EU Agenda for Change** (2011), the revisions of the **Cotonou Agreement** (2005 and 2010), the **EU Code of Conduct on Division of Labour** (2007), etc. The **EU Agenda for Change** was adopted in 2011 to “increase the impact and effectiveness of EU development policy”<sup>5</sup> and highlighted that EU assistance targets (i) social protection, health, education and jobs, (ii) the business environment, regional integration and world markets, and (iii) sustainable agriculture and energy. It also put **greater emphasis on effectiveness-related principles** (differentiation, concentration, coordination and coherence with other policies) and proposed to **focus on two key policy areas** (human rights, democracy and other key elements of good governance, and inclusive and sustainable growth for human development). In addition, the EU Agenda for Change also introduced **innovative financial instruments, such as blending**. Since EDF11 began in 2014, the EU has continued developing new development policies.<sup>6</sup> A full analysis of the EDF and its various reforms is provided in Annex 2. The EDF has particularities

which are the result of its history and its legal basis, as well as of the evolving European and international context. These particularities include:

- The EDF targets countries (ACPs) and territories (OCTs) with a special tie with the EU MSs. The legal basis for targeting both groups is different for ACPs (which are governed by the Cotonou Agreement) and OCTs (governed by the Treaty on the Functioning of the European Union and the Overseas Association Decision (OAD)).
- The EDF operates at different levels (country, regional and Intra-ACP) with a range of financing modalities: project grants, Budget Support (BS), loans and blending. Coordination and complementarity among these levels and financing modalities is thus important.
- Unlike the other EFIs, the EDF is not part of the EU budget. The EDF has its own financial and implementation regulations. These have, through various reforms, been closely aligned with the Financial Regulation (Regulation 966/2012 of 25/10/2012) applicable to the EU budget, and with the Common Implementing Regulations (CIR) of the other EFIs. Because it is outside of the EU budget, the budget rule of “annuality”<sup>7</sup> does not apply to the EDF, making multiannual commitments easier. The current EDF has a seven-year horizon (up from the earlier five to extend to the expiry of Cotonou agreement in 2020).
- The budgetisation of the EDF has been a recurring agenda item. Discussions are likely to continue among EU MSs and EU institutions in the context of the new Multi-Annual Financial Framework (MFF) negotiations.
- There are geographical and thematic overlaps between the EDF and other EFIs (e.g. the Development Cooperation Instrument (DCI) and the European Instrument for Democracy and Human Rights (EIDHR), see Annex 12, section 2, and Annex 20, Part B). This has implications for coordination and exploration of synergies.
- The EDF11 is a continuation of the EDF10 in terms of key principles, structures and modalities, but it has seen changes in terms of simplification of procedures and more focused priorities. The EDF11 included changes in priority sectors driven by the Agenda for Change and the principle of concentration.
- The EDF responds to the objectives, values and principles included in the Treaty of Lisbon and the Cotonou agreement. There is an ongoing discussion on the post-Cotonou development cooperation framework (post-2020) which could mean various changes in the future (new agreement, no agreement, etc.).

5. The EDF is implemented within a global context that is changing rapidly and that is facing new challenges. Key European and global issues at the design stage of the EDF11 have evolved. Some issues have become more prominent (climate change, terrorism), others have receded (the economic crisis in Europe). New agendas such as migration have also come to the fore. Additional changes are to be expected as a result of the priorities reflected in the EU Global Strategy which puts the accent on interlocking political, development and security concerns (EU, 2016),<sup>8</sup> and the implications of the United Kingdom’s (UK) exit from the EU. The new international agendas (Sustainable Development Goals (SDGs) / Agenda 2030, the United Nations Framework Convention on Climate Change (UNFCCC), etc.) and the consolidation of China’s role as a major player in the development arena are also likely to affect EDF’s priorities and its political and financial leverage in Partner Countries (PCs). There have been institutional changes within the EC. This includes the relatively recent establishment of the European External Action Service (EEAS),<sup>9</sup> as well as changes in guidelines, in management and implementation procedures, and in human resourcing.

## 1.2 Purpose and scope of the evaluation

6. This evaluation is the **mid-term Performance Review of the EDF11, which started in 2014 and runs until 2020**. It is taking place as part of a synchronised review of all the EFIs and has been brought forward by one year<sup>10</sup> and with a shared common Open Public Consultation

(OPC) in February 2017.<sup>11</sup> Findings of the OPC inform this final report. The overall and specific evaluation questions are in the Evaluation Terms of Reference (TOR) (Annex 1), and a detailed timetable of the evaluation is provided in Annex 3. The evaluation covers several groups and subgroups of interventions: bilateral ACP (with specific analysis for Africa, Caribbean and Pacific), regional cooperation, intra-ACP and OCTs. It examines the achievement of the objectives of the EDF; the implementation of principles, programming and operations; and the complementarities and synergies of the EDF in relation to other instruments.

7. The primary users of this evaluation are the EC, the EEAS, the Council of the European Union, and the European Parliament. The information generated by the evaluation will also be of interest to and used by a large number of the EDF's stakeholders at different levels. This includes the ACP beneficiary countries and the OCTs, development partners, member states, civil society organisations, regional organisations, donors, think tanks and academics. The EDF stakeholders are highlighted in Annex 2, Figure A.2 and Annex 4, Table A.7.

### 1.3 Methodology and limitations

8. The evaluation **focuses at the instrument level** and is conducted at a time when much of the implementation of the EDF has yet to start. It focuses on the **fitness for purpose** of the EDF11 at the outset (in 2014), and at the mid-point (2016) and examines the extent to which EDF11 has been adapted to take into account lessons learnt from the EDF10 period, and whether this has improved, or is likely to improve, the EDF's performance against its objectives

9. **Base-line and evaluation criteria:** The default baseline for the evaluation is January 2014,. In line with the EU's Better Regulation Guidelines (EC, 2015a) the focus is on relevance, efficiency, EU added value, coherence and complementarity. Since it is too early to assess ex-post effectiveness and impact of interventions financed under EDF11, the evaluation makes a considered assessment of the likelihood of effectiveness, sustainability and impact over the remaining period. For EQ2 (effectiveness) the evaluation therefore drew the base-line back to the start of EDF10. Likewise, under EQ3 (efficiency) improvements of EDF11 were measured against the performance of EDF10 **Evaluation approach:** A rigorous approach was used with a reconstructed intervention logic (IL) for the EDF and testing of assumptions associated with the expected changes (see Annex 4 for details of the methodology and Annex 5 for the complete IL). An evaluation framework captured the links between the detailed EQs, sub-questions judgement criteria, and indicators and guided all phases of the enquiry. A completed evaluation framework, with indicator-level responses to each of the EQs an assessment of the strength of evidence for each indicator can be found in Annex 6.

10. The evaluation approach maximized the use of available secondary information, reviewing more than 2000 documents from the EDF10 and EDF11, undertaking quantitative analysis of international and EC databases<sup>12</sup> (see Annex 13) collecting primary data through over 300 interviews (see full list of interviewees in Annex 3, Table A.3), 39 responses to a survey of EU Delegations in ACP countries, 125 responses to the OPC on the EDF, eight OPC meetings with various stakeholders, as well as eight country visits<sup>13</sup> which provided specific country-based information and helped to validate documentary findings. An in-depth analysis was also done for a sample of 25 countries for which recent evaluation evidence is available (the list of countries can be found in Annex 4). Documentation was analysed using a pre-designed rigorous mapping tool (see Annex 4, Figure A.6) which allowed for a uniform analysis. All interviews were recorded in an interview compendium, coded, and analysed using a key word search. All qualitative data were triangulated using at least three sources. Given the early stage in EDF11 implementation, findings about the likely effectiveness of EDF11 are largely extrapolated from evaluations and reviews of EDF10, and triangulated, where feasible, with external stakeholders.

11. **Limitations:** The following limitations apply to this evaluation. They are discussed in more detail in Annex 4 (methodology):

- Use of a common survey with other evaluations limited the number of EDF-specific questions that could be included. The survey results are found in Annex 11 and Annex 12.

- Use of existing evaluations maximized the use of available evidence and allowed the performance review to cover substantial ground in a short time-frame. However it contributed to an underrepresentation of fragile, conflict and post-conflict countries
- Evidence pertaining to the period being evaluated (2014 and beyond) is mostly based on internal documentation and internal (EC) sources.
- The report focuses on the EDF and explores other EFIs when and where they overlap with the EDF (e.g. to explore questions on complementarity). Since other EFIs have not been explored in the same depth as the EDF, it was not always possible to ascertain whether some of the features highlighted in the report are exclusive to the EDF or not.
- For OCTs the evaluation faced challenges of limited documentary evidence for the EDF11.

## 2. Responses to evaluation questions

### 2.1 EQ1: To what extent did the overall objectives and principles of the 11<sup>th</sup> EDF respond to EU priorities and beneficiary needs in 2014? To what extent can they accommodate changed parameters since then?

*Summary response to evaluation question (see Annex 14 for detailed evidence on this EQ)*

EDF11 was found to be highly relevant to the EU's overall objective of poverty eradication and to new priorities emerging from international forums in 2016. Despite wide stakeholder consultations, partnership and aid effectiveness principles as well as country preferences were respected less well when compared to EDF10 in a context of strong HQ-driven agendas. Flexibility to adapt to new Partner Country (PC) priority issues is limited in the EDF which provides a medium- to long-term framework to address structural development challenges. Responding to emerging priorities of the EU agenda has fallen on the Trust Fund for Africa, mainly financed from the EDF reserves, but its modalities risk undermining fundamental principles and strengths of the EDF.

#### *JC 1.1 Extent to which the 11<sup>th</sup> EDF design responded to EU priorities in 2014*

12. This Judgement Criterion (JC) seeks to verify to what extent the EDF11 programming instructions reflected the EU's development cooperation policy objectives and principles as defined in 2012-2014, and to what extent these were then applied in the programming choices.

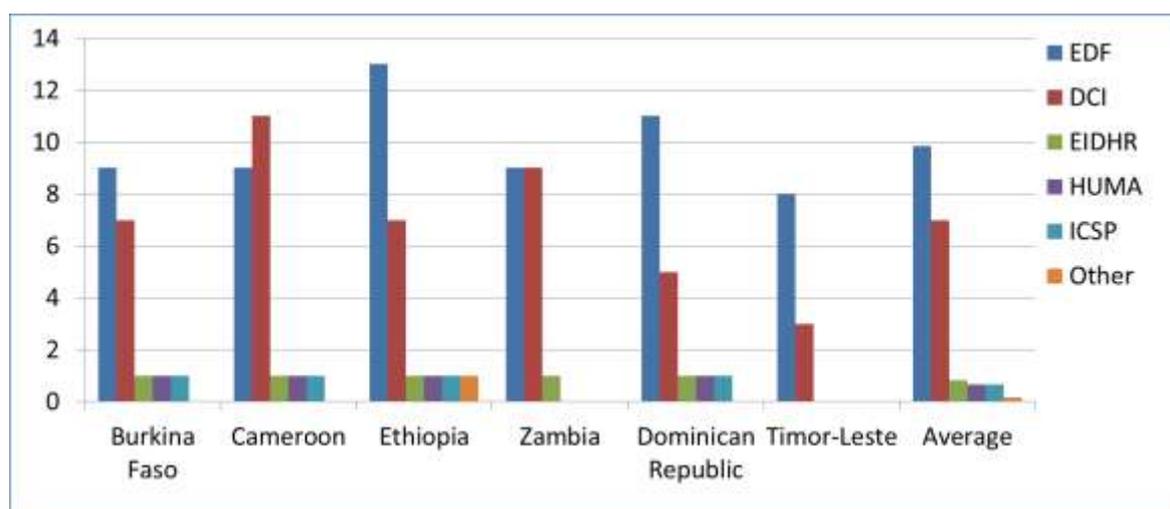
13. The EDF 11 programming guidelines issued in 2012 and 2013<sup>14</sup> perfectly reflected the aid effectiveness principles included in the EU's Agenda for Change of 2011 and the priorities defined in the EU Consensus of 2005 which were the EU references for development cooperation at the time.<sup>15</sup> The EDF remains the instrument of choice for '*supporting developing countries' efforts to eradicate poverty (which) is the EU's primary objective of development policy and a priority for EU external action in support of EU's interests for a stable and prosperous world*' (EC, 2011a, page 3). Compared to EDF10, EDF11 programming guidelines introduced the principles of differentiation, concentration and synchronisation with the PC's cycle (and thus flexibility in the EU programming cycle to adapt to that of the country). They also explicitly linked the modalities and levels of support to the country's commitment to EU fundamental values (EC, 2012c page 3); however, the intended topping up of allocations for good performers did not materialise, due to difficulties in MSs agreeing on the mechanism.

14. Evidence from in-country and EU HQ interviews<sup>16</sup> as well as from the signed EDF11 National Indicative Programmes (NIPs) as of April 2016 (EC,2016l) shows that a very large majority of programmes (97.5% of total amounts allocated to national programmes and all of the regional and intra-ACP envelopes) corresponded to the Agenda for Change's two priority sectors: (i) human rights, democracy and other key elements of good governance (almost one third of allocated amounts) and (ii) inclusive and sustainable growth for human development (just over two thirds of allocated amounts). One-fifth (20%) of the country programmes shared 2.5% of total allocated

amounts: non-priority sector allocations thus involved numerous programmes of small amounts. On the whole the adequacy of EDF11 allocations to the priorities set by the Agenda for Change is unavoidable as between them, the two priority sectors regroup almost all areas of public expenditure with the exception of defence and security (see Annex 14).

15. EDF11 allocations also show that the concentration principle was well respected since, on average, country programmes supported only 2.4 sectors. To increase responsiveness to specific needs, more sectors were allowed in fragile countries (see EC,2016l) such as Madagascar, Niger (five sectors) or DRC, Guinea Conakry and Liberia (six sectors). However, despite EDF11 aid concentration efforts, EU aid remained fragmented as illustrated in Figure 1 below. This is explained firstly by the broad definition of EU sectors compared to OECD/DAC definitions, which at country level are also often loosely interpreted, raising the number of focal sectors beyond three. It should also be noted that, although not counted as different sectors, general BS (GBS) and associated policy dialogue generally span more than three sectors; similarly in regional indicative programmes, the high number of specific objectives and results identified (up to over 100 in some regional indicative programmes) also meant a *de facto* increase of sectors covered. Secondly, the use of multiple EFIs increased the number of sectors of EU support in each country. Finally, in most countries, whilst EDF11 concentrated, EDF10 projects and programmes were still being implemented and thus temporarily increasing the number of sectors during this transition phase.

**Figure 1 Selected countries: number of sectors benefiting from EU support per EFI in 2015**



Source: authors, calculated from EU dashboard

16. In a few cases (Ethiopia, Burkina Faso) field interviews pointed out that it is illusory to think that the principles of concentration can be applied when: the portfolio's amount is huge compared to other donors/public expenditure (concentrating on three sectors might also 'flood' these sectors and crowd out other support as also pointed out by some respondents to the OPC); BS is used at macro level; there are so many different competing priorities required by EU Headquarters; EDF10 is still largely being implemented; regional and intra-ACP activities are undertaken in different sectors; and an array of other EFIs are also funding projects in different sectors in the country. This last point was also confirmed by the findings from the survey (see Annex 11, Table A.27, Table A.28 and Table A.29): 85% of EUD respondents used at least three EFIs, the most popular ones being EIDHR and DCI (97% and 82% of respondents respectively), followed by the Instrument contributing to Stability and Peace (IcSP) (49% of respondents). Within the DCI, the budget line for civil society organisations (CSOs) and local authorities (LAs) was used by 79% of respondents, and for the Global Public Goods and Challenges (GPGC) programme by 49% of respondents.

## JC 1.2 Extent to which the 11th EDF design responded to beneficiary needs in 2014

17. Beneficiary needs are usually approached by assessing the extent to which the Government, local authorities, civil society and private sector representatives (broadly the PC) have been consulted during the programming process and to which the programming choices were aligned with the Government's national strategy. In the EDF11 programming guidelines, the PC's role in programming is indeed approached through these two channels (see Annex 10, section 2.2): (i) the simplification of programming deliverables calls for using existing national or regional development plans instead of elaborating Country or Regional Strategy Papers (reflecting full alignment) and (ii) consultations both through the organisation of programming seminars and the application of the ownership principle. Taking these in turn, the simplified programming process was applied in all but two (Namibia and Zimbabwe, see EC,2016l) of the 77 countries for which NIPs were signed (as of August 2016) thus demonstrating *a priori* a high degree of alignment with national priorities.

18. However, the extent to which consultations enabled beneficiary needs to be taken into account is more mixed: according to existing evaluations, OPC results, CSO reports and interviews (see Annex 14 and Annex 15), CSOs and Governments have been consulted more for EDF11 than for EDF10 programming but, with regards to CSOs, consultations have been uneven from one country to the next and limited to a specific subset of CSOs (those known to the EUD, based in capital cities) who were not necessarily representative. Ultimately, despite consultations, government and CSOs' views (with some notable exceptions such as in the Pacific region), have rarely been taken account of in programming choices. The private sector and other country stakeholders (including local authorities, religious leaders, political parties, cooperatives and trade unions) have not been consulted and, except for the private sector, were not mentioned in the programming guidelines. A strong view from various constituencies emerged from the OPC on-line responses about the need to strengthen delegations' capacity in planning and consultation processes, together with a more robust and transparent approach to consultation in general. Box 1 illustrates the case of infrastructure, a sector the EU deliberately disengaged from in EDF11 national programmes but that was still open to be included in regional programmes.

### **Box 1. EDF support to infrastructure in EDF11**

Under the EDF11 the EU discontinued its support to road infrastructure (EC,2016l) following findings of significant weaknesses in the EU's support to a sustainable road network in Africa (ECA, 2012a). Support to roads had been a focal sector for various countries for several EDF cycles, including Zambia, Burkina Faso and Cameroon where selected progress had been made in particular through donor coordination and national and regional policy dialogue on vehicle overloading and technical cooperation with the road agency and the road fund (see country findings in Annex 17 and Ecorys, 2016b).

In Zambia, as elsewhere, amongst reasons cited for abandoning this priority sector were limited government commitment for real reforms, frustration with the policy dialogue, pressure within the EU to reduce the number of sectors under the new EDF11 concentration agenda, the need to make room for the new energy agenda, and a sense that the support to the road network could continue through the regional envelope.

Even without EDF11, Zambia and Burkina Faso EUDs continued to engage in the sector's policy dialogue. Nonetheless, there as in Cameroon, stakeholders felt that the process of disengaging from the sector was insufficiently well prepared, that the departure of the EU had left a gap that cannot and will not be filled by other donors (or even worse has led to other donors also reducing their support to the sector such as in Burkina Faso), and the criticism that there should have been a clear exit strategy for disengagement. Other partners highlight that this is an area where the EU had a clear added value because of its expertise, its sustained support to the sector, and the size of its funding (see Annex 14).

19. The EDF11 programming thus used a top-down approach to apply the concentration principle but at the cost of the Cotonou Agreement's central principle of partnership as stated in its Art.57: 'The ACP States shall be responsible for: a) defining the objectives and priorities on which the indicative programmes are based (...)' (p61, EC, 2014a). In cases where EU choices and priorities prevailed over country preferences, in terms of sectors and/or modalities of support, the relevance to the country's needs has, however, not been jeopardised. Indeed, in all cases reviewed, the development priorities are so numerous and national development plans so wide in scope that all sectors retained by the EU also corresponded to country development priorities.

20. EDF11 programming was also marked with the objective of differentiation, i.e. focusing on those countries most in need. A new allocation formula was devised whereby EDF resources were shifted in favour of least developed countries (LDCs) and low income countries (LICs), taking account also of their absorption capacity and performance: this resulted in LDCs and LICs being allocated 85.3% of EDF resources in EDF11 compared to 79.5% in EDF10 (EC, 2013c). However, as argued by ECDPM (Herrero et al. 2015), the targeting could still be improved since on a per capita basis the concentration on the poorest countries is much less marked. It should also be noted that the differentiation formula was not applied to OCTs.

21. Finally, it should be mentioned here that the EDF is not the only instrument available to respond to countries' needs. According to the responses to the EUD survey (see section 2 of Annex 11), 82% of respondents found that the mix of instruments available corresponded well to the needs of the country and 36% found that the mix of EFIs had a beneficial effect upon their relationship with the country. In particular, it was found that the other EFIs complemented the EDF well because of their flexibility (not being tied to a seven-year programming), their ability to support sensitive issues (because they do not require NAO co-signature) and their short-term complementarity with long-term concerns, even though it was also found in a minority of cases (13% of respondents) that the availability of so many different EFIs was confusing for the country.

*JC 1.3 Extent to which the original objectives and priorities of the 11th EDF are still relevant in the emerging international context (priorities up to 2020)*

22. The EDF11 was programmed just before major new aid cooperation orientations were defined at international level. Indeed, shortly after the EDF11 guidelines were issued, **the Agenda 2030** (or the Sustainable Development Goals – SDGs), the **Addis Ababa Action Agenda**, the **Paris Agreement on Climate Change** and the **Sendai Framework for Disaster Risk Reduction** were launched. The main thrusts of these new international agreements (see Annex 2) are the need to: address both poverty eradication and the economic, social and environmental dimensions of sustainable development; apply the Agenda 2030 to all countries under a Global Partnership (shared responsibility, mutual accountability, and engagement by all); improve monitoring and reviews to ensure that the Agenda is implemented for all, leaving no-one behind; prioritise financing according to SDGs and include all sources of finance (public and private); and strengthen the ability of countries to deal with the impacts of climate change.

23. While the 2015 review of the MDGs enabled international organisations and governments to position themselves jointly on these areas and commit to future courses of policy and action, the EU had already integrated many of these concerns into its own development cooperation priorities (see Annex 2). They are reflected in the Agenda for Change and endorsed in the revision of the Cotonou agreement in 2010, which included expanded provisions *inter alia* concerning the interdependence between security and development (addressing the root causes of conflict); the importance of climate change; a greater emphasis on sustainable development; the role of national parliaments, local authorities, civil society and private sector in development; greater donor coordination and aid untying; and improved coherence of EU policies with development objectives. The new financing options explored during 2015 were in some ways also preceded by the Commission's inclusion of blending as a new means of financing in EDF11 (especially important, as a financing modality, in the regions covered by the EDF where it has become the largest individual financial envelope within regional programmes; see Annex 7).

24. In addition to the new international agendas, some new priorities and issues also came up at the European level after issuing the EDF11 programming guidelines in 2012: the two most important issues amongst these, security and migration, had not yet been foreseen in the EDF's scope of sectors at country level, or at least not as explicitly as they appear in 2016. Of course, security had been an important component of the regional envelope since EDF10 with the allocation of more than EUR 1.9 billion to the African Peace Facility (APF) since 2004. The EU's Global Strategy of 2016 (EC, 2016a) responded to a changing international and European context by putting the accent on interlocking political, development and security concerns and specifically highlighted the role of development aid in complementing the various other areas of external action (see Annex 2). The Commission's Communication on establishing a new Partnership Framework with third

countries under the European Agenda on Migration, June 2016 (EC, 2016j), similarly emphasised the need to step up support for those in need in their countries of origin and transit. These two important areas for EU's foreign policy had not been prioritised in the fund allocations of EDF11 at country level (except in seven programmes dealing with development and security, see EC,2016l) but were present at regional level (with support to the APF, a regional migration programme and security as a sector in Regional Indicative Programmes – RIPs). They could thus not be easily accommodated in country programmes, unless they fitted into existing sector choices, such as, for example, where a loosely defined governance umbrella sector was chosen as a focal sector.

25. The solution to address these two areas was found in the creation of the EU Emergency Trust Fund for Africa (EU TF) and the new Fund for external investment, both supporting these initiatives and funded *inter alia* from EDF11 reserves contributions. The EDF11 reserves thus allowed the funding of new initiatives such as that on migration (see ¶28 on reserves) compensating for the relative lack of flexibility of the EDF11 programming.

### **Box 2. Flexibility of programming to include emerging and/or unforeseen issues: the case of Burkina Faso**

EDF11 programming in Burkina Faso has been remarkably flexible, enabling it to remain highly relevant to a situation that drastically changed both domestically and internationally. Whilst having been signed only few days before the popular uprising that brought an end to the 27-year rule of President Blaise Compaoré, the EDF11 programming document was sufficiently flexible to allow the immediate design and rapid approval of a State Building Contract (SBC). The SBC was disbursed only months after the events: it has been unanimously recognised as having been instrumental in allowing minimum basic public services to operate at a time of major disruptions and creating space for the transition Government to recover from these events and reinstate the functioning of state institutions. Following this initial emergency programme, EDF11 supported the newly elected Government's national development programme in its priority sectors, choices confirmed through extensive stakeholder consultations during programme formulation; BS was retained as the most adequate and flexible implementation modality for most of the EDF11. Despite the political upheavals of 2014-2015, the choices of the initial EDF11 priority sectors thus remained highly relevant: the programming offered adequate flexibility to respond to sudden unforeseen changes in beneficiary needs and even enabled the EU to stand out as the one donor that could respond swiftly to a crisis situation with its EDF-funded SBC.

New preoccupations emerging from international discussions (including SDGs, migration, security, inclusive and cross-sector approaches) were also accommodated in Burkina Faso's programme. To support internal security improvements, a suddenly important preoccupation with the events of late 2014, whilst not included as such in the EDF11 NIP, the EU used its governance/justice focal sector envelope (to strengthen capacities of the police and provide some equipment as well as infrastructure) in complementarity with actions funded by the EU TF (reinforcement of external border controls, projects to provide employment in remote areas).

#### *JC 1.4 Extent to which the 11th EDF has foreseen space for coping with unexpected needs*

26. EDF11 is set within a seven-year timeframe during which new international, EU, regional and country priorities might emerge: this JC looks at the flexibility of EDF11 to integrate these existing and potential new needs.

27. The EDF10 performance review (EC, 2012b) found that the EU's responsiveness could be improved, especially in relation to (1) aid programming in crisis and fragile situations, (2) a structural approach to build up the resilience of recipient countries to both natural hazards and economic shocks, and (3) mechanisms for dealing with broad and generic exogenous shocks. Appropriately, the EDF11 programming guidelines thus included a new principle of synchronisation and flexibility (see above and Annex 10), which would enable the EU to react quickly to any sudden changes in country/regional situations: accelerated procedures and updates of country analysis as and when required were proposed, followed by reviews of the programming documents if required to allocate unused or non-programmed funds. However, as seen above, the synchronisation did not take place since the vast majority of NIPs still follow the Multi-annual Financial Framework (MFF) 2014-2020 cycle rather than the country cycle and the MTRs are scheduled for 2017, in mid-MFF cycle, much as was the case in the past.

28. In addition, the EDF11 has a reserve, which, contrary to EDF10 when reserve amounts were allocated to each individual country (in the form of a 'B envelope'), is a general amount, whose use is discussed at EDF Committee level. It is meant to fund bilateral and regional support for unforeseen needs and to be used in emergency and post-emergency situations.<sup>17</sup> By April 2017, nearly €500 million had been disbursed to support operations of the Humanitarian Aid and Civil Protection Department of the European Commission (ECHO), nearly €500 million allocated in emergency support to individual countries and €1.5 billion disbursed to the EU TF (see ¶25 above and Box 3 below). The EDF11 reserve is also intended to contribute to the new fund for external investment, which benefits both African and European Neighbourhood countries (see EC, 2016k), and a shock-absorbing mechanism following a revision of Annex 2 to the Cotonou Agreement. The reserve's funds are limited but can be replenished.

**Box 3. Using the EDF reserves to address emerging EU priorities: the case of the Emergency Trust Fund for Africa<sup>18</sup>**

Against a background of wide concern with the effects of fragility, instability and insecurity relating to displacement and migration (EC, 2015q), a 'European Emergency Trust Fund for stability and addressing root causes of irregular migration and displaced persons in Africa' (EU TF) was set up in November 2015 at the Valletta Summit on Migration. It was established to strengthen governments' capacity in migration management (facilitate returns, deal with trafficking, improve border management) and for supporting living conditions by providing durable solutions to population groups who are destitute and have no economic and social perspectives. It is described as an *'innovative mechanism (...) used in the field of development cooperation to pool large resources from different donors to enable a swift, common, complementary and flexible response to the different dimensions of an emergency situation.'* (EC, 2016m). Set to benefit 26 countries affected by migration, the initial €1.88 billion fund had increased to €2.5 billion by December 2016, of which €2.289 billion from EDF contributions.<sup>19</sup> The EU TF has been used extensively in Ethiopia for example (see Box 9) to fund important projects in the area of migration in complementarity with projects funded by the EDF and other EFIs. Right from the start of the EU TF Ethiopia offered the advantage of having a previously established framework of operations for migration issues and an EUD that engaged actively in the management of the EU TF projects.

In line with the instrument-level focus of this performance review, the evaluation examined the legal documents underlying the EU TF establishment and operations,<sup>20</sup> conducted interviews with representatives of the various stakeholder groups involved in the EU TF at global level, in Ethiopia and Burkina Faso, and reviewed the case of Ethiopia as an example of EU TF functioning (see Annex 16). Notwithstanding the recognized political importance of the fund and the priorities it addresses, this assessment brings out a number of concerns.

Firstly, the analysis shows that the EU TF formal regulatory documents (EC, 2016r; EC, 2017b) foresee a role for PC and regions in the governance and decision-making structures of the EU TF that is significantly more limited than in the EDF regular processes. The role of the PC – as established in the Constitutive Agreement of the EU TF – is reduced from that of equal partner in the EDF to that of an observer, both in the Board (which decides the TF's strategic directions) and in the Operational Committee (which approves EU TF-funded projects) (see EC, 2016r and Annex 16, section 5). In interviews with the Commission the evaluation was told, and this was verified in the minutes of meetings, that in practice PCs are present and consulted during meetings. However, the formal requirement to do so is not guaranteed in the current EU TF's governance structure which therefore does not sufficiently acknowledge and integrate the partnership and ownership principles underlying the Cotonou Agreement.

Secondly, the analysis by this evaluation highlights that the manner in which programme design and decision making takes place may have considerable implications for the effectiveness and sustainability of operations funded with the EU TF, when compared to standard EDF funding. This is because EU TF-funded projects follow accelerated and simplified identification, formulation, approval and contracting procedures where project scrutiny is less thorough than for EDF funded projects and where project implementation is mostly done through delegated cooperation (where the EUD has less control over and involvement in project management). Compared to standard EDF projects, the shortened preparation and approval time, the indirect involvement of the EU in project implementation and the fact that these projects originate from EU priority concerns rather than as a response to PCs' long-term objectives, all raise concerns over the likely effectiveness and sustainability of EU TF projects and over the ability of the EU to closely monitor their implementation.

29. Although EDF11 reserves are a potential source of funding for unforeseen events, interviews (see Annex 14) and the results of the EUDs' survey (see Annex 11 section 3) mostly point towards

the rigidity of the EDF, especially in the face of a fast-changing world, the difficulties of understanding how to access additional funding for unforeseen events and/or bending the existing programme to adapt to new needs; most saw the solution to changing needs in the reallocation of resources according to new priorities at the time of the MTR and/or the use of other EFIs to address specific issues. For the latter, 55% of respondents to the survey found that the mix of instruments allowed them to respond to unforeseen demands from the partner country/region but not to unforeseen demands linked to new international commitments. There was a general recognition that it is easier to respond to a crisis (once declared) than to a change in needs and/or a perceived immediate threat of a future crisis. Almost a quarter of respondents (41%) indicated that EDF was not sufficiently flexible and pro-active to respond to unforeseen demands emerging from changes in emphasis in the EU's own agenda; the EU TF or the IcSP would be more appropriate. However, it was also recognised that one of the EDF's strengths is its long-term programming, which enables predictable funding and a coherent approach to structural development problems which are more difficult to achieve and maintain when different and more short-term EFIs are used.

30. The OCTs clearly present a unique set of challenges and needs compared to the other ACP countries in which the EDF operates. In addition, their association with the EU is not governed by the Cotonou agreement but by a specific Overseas Association Decision. Evaluations for EDF 10 found evidence that the support to the OCTs has served its purpose well in being consistent with EU policy objectives and promoting social and economic development in the OCTs and bringing OCTs economically closer to the EU as well as being consistent with the PCs' needs and priorities.

## **2.2 EQ2: To what extent has EDF delivered results against objectives and specific EU priorities?**

*Summary response to evaluation question (see Annex 17 for detailed evidence on this EQ)*

Due to the timing of this review, the assessment of the effectiveness of the EDF relied on EDF10 achievements. Existing evaluations conclude mostly on positive outcomes, with varying degrees of success depending on regions, countries and sectors but also generally on the poor performance on sustainability of outcomes. EDF11's institutional structures and processes were found to be generally conducive to improved effectiveness of EDF11: elements were in place for adequate delivery of EDF support even though certain aspects merit attention (role of the NAO, EUD staffing) and monitoring was found more compliance-based than results-oriented.

### *JC 2.1 Extent to which institutional structures and processes are in place for EDF11 to deliver expected results*

31. Looking at human resources, management processes and structures, guidance and monitoring systems, the EDF11 was found to be operating within a propitious institutional and regulatory setting to deliver effective support. With regards to institutional structures and processes in place to enable EDF to deliver expected results, the different structures responsible for the management of EDF11 implementation include: DEVCO and EEAS at HQ, Delegations in the field and the EDF Authorising Officers at country, territory and regional levels, regional organisations and the ACP Secretariat (see Annex 17, section 1). Country, thematic and instrument strategic evaluations show that human resources within EUDs were often seen as a constraint to effective EDF10 delivery (see Annex 17, section 2). They found occurrences of staff in number and technical and/or soft skills expertise (for example for policy dialogue) and staff time being mostly taken up by technical, administrative and financial management rather than analysis and strategic exchanges with PCs. The importance of having adequate staff on the ground was illustrated by the experiences of Togo, Timor Leste and Djibouti where (temporary) 'remote' or very limited field presence of EUD staff was found to have severely affected the effectiveness of EDF10 implementation (with notable shortcomings in for example the ability to monitor projects or hold policy dialogue) (see Annex 17).

32. To reduce the number of staff but also better distribute human resources amongst EUDs, the Commission introduced a staffing and aid modality optimisation tool in July 2014 (Optimus; see EC, 2014t) arising from completion of a workload assessment in 2010. It also aimed for a simplification

of procedures<sup>21</sup> to ensure efficient and effective portfolio implementation (see also EQ3 in section 2.3). Documents reviewed and interviews held for this evaluation show mixed results (see Annex 17, section 2): a review of External Action Monitoring Reports (EAMR) in 2015 shows that just over half the EUDs still mentioned serious staffing difficulties linked to scarcity of posts, unfilled vacancies, inadequate job profiles, extended paternity/maternity leave and difficult working conditions, especially for local staff, and hence difficulties in working and recruiting. However, similarly to DFID's 2016 Multilateral framework review (DFID, 2016), our country visits revealed that staffing had improved since 2015 and also that, in recent years, general expertise and competence of EUD staff was more attuned to existing portfolios; in some countries recent changes in focal sectors of attention (in particular the addition of energy to the portfolio) jeopardised the adequacy of expertise and, as also underlined by DFID (ibid), staffing remains an area for improvement. The issue of the regionalisation of the Finance and Contract staff was mentioned in countries as a major potential hurdle to efficiency and effectiveness (see also EQ3 in section 2.3) and staffing to deal with regional programmes remains a problem (see Annex 7). The relationship between the DEVCO and EEAS is another issue that needs resolving as the two tend to operate in silos rather than together. Beyond numbers and expertise of staff, their competencies (including management and policy dialogue capacities, commitment, and leadership) should also be considered in discussions of effectiveness but were beyond the scope of this review.

33. In the countries visited, the NAO structure was often mentioned as representing a barrier between line ministries benefiting from EU support and EUD staff: as one interlocutor put it '*The EDF forces us to go through local authorities; however, this obligation is neither synonymous with ownership, nor with absorption, nor with effectiveness, especially in weak and fragile countries*'. Several interviewees raised the need for the role of the NAO to be reviewed (see also ¶64), in favour of a more democratic and participatory ownership and a more direct contact between the EU and technical ministries. However, the NAOs pointed out during discussions that concomitantly the role of EUDs and HQ also needs to be reviewed and the dynamics of the relationship NAO-EU assessed. In regional and intra-ACP cooperation evaluations, the RAO structures were found to be significantly weaker than at country level, constraining the capacity to deliver and follow up results (see Annex 7). This finding was corroborated during the country visits (see Annex 17, section 3): the change in the EDF11 implementation regulations on the use of regional institutions (the direct access principle, see ¶59) was thus generally welcomed by stakeholders (less so by the Duly Mandated Regional Organisations (DMROs)). In contrast, the dismantling at end 2015 of DEVCO's intra-ACP Unit (see Annex 7) for coordination purposes and the re-assignment of staff and functions across three Directorates and seven thematic units was felt by several actors to change the intra-ACP instrument into a simple complement to thematic budget lines.

34. With regards to organisation and management systems, EDF10 evaluations and interviews of MS HQs mentioned the complexity, rigidity and lengthiness of the procedures (see for example MFA Netherlands, 2013). In response to these findings and to help absorbing the planned staff cuts for 2014-2017, reduce DEVCO's workload and increase its effectiveness (see ¶32), the Commission initiated the simplification of DEVCO processes (see EC, 2016d). Field visits found that, so far, these simplifications were hardly noticed by staff and made no difference to their workload.

35. In terms of guidelines, EDF11 like its predecessors, is subject to implementation rules, financial and contractual procedures, programming guidelines, and a series of thematic policy guidelines, as well as many different instructions and tools that are produced on a case-by-case basis (see Annex 17, section 1). In addition, Council conclusions and Council decisions provide formal EU positions on specific topics that influence the programming and formulation and thus the likely results of EU interventions. With this guidance on a breadth of topics, the Commission tries to ensure that all its EUDs follow the same formats and procedures and adopt a common approach to specific policy areas/sectors. The policy papers should provide best practice and best fit to the EU political and policy objectives and guidance on designing programmes for most effective results. However, interviews with EUD staff during country visits revealed that they rarely use these guidelines; rather, they take their cue from the thematic and sector experts at HQ and steer consultants, CSOs and Government staff to the guidelines for understanding (and applying) the EU approach. Whilst some EDF10 evaluations (MFA Netherlands, 2013, DFID, 2011, Petrucci et al., 2011) pointed towards lack of application of cross-cutting principles (boxes being ticked but nothing

really being done to integrate these aspects into programme design), lack of proper institutionalisation of good practices and a limited learning culture within the EU, others (mainly EDF10 country strategy evaluations) found a better track record on these issues, especially with regards to gender and environment. As illustrated in Box 4, country findings were also more positive: cross-cutting issues were being addressed seriously in EDF11 project design in at least some countries.

#### **Box 4. Cross-cutting issues and gender mainstreaming in Zambia**

Our findings on the four main cross-cutting priorities, which should be implemented horizontally across all EDF projects, are as follows (Annex 9 provides more detailed evidence across all priorities):

**Gender:** Gender mainstreaming has improved since EDF10, as illustrated by increasing EDF commitments to projects addressing gender issues (but not targeting gender as the main objective) between 2010 and 2014 and a pronounced spike in 2015 (doubling of commitments). Our country visit to **Zambia** illustrates good practice in this area: the Zambia EDF portfolio devotes consistent attention to gender across the different programmes and activities, for example, attention to women traders in the agriculture sector, a focus on gender in governance, and the integration of gender issues in the policy dialogue.

Factors contributing to gender mainstreaming in Zambia included: strong policy and good guidelines by the Commission; a strong focus by selected MSs on gender allowing for alignment on gender issues; gender champions at different levels within the EUD (including at senior level) and the Zambian Government; the existence of an internal EUD Quality Support Group which meets regularly and facilitates dialogue on gender across different sectors, facilitates exchange and allows for the identification of opportunities; and technical support to gender through a dedicated focal person who also provides the monitoring and evaluation support.

These positive elements have come together to produce a strong focus on gender. This process also highlighted a weakness of EUD's institutional memory when it recently emerged that the EU had supported an important gender initiative a decade ago, but no one could recall this initiative or find related documentation.

**Climate change and environment:** EDF support to climate change and environment has remained essentially flat between 2010 and 2015 with progress recorded on projects labelled with the issues as a "significant objective" (i.e. projects with other primary objectives but which take environmental and climate issues into account) while those with the label "main objective" decreased or remained stagnant. In other words, the evidence indicates that projects designed specifically to tackle environmental issues and climate change have decreased slightly in the period 2010-2015.

**Promotion of democracy, the rule of law and respect for human rights and fundamental freedoms:** data collected by the team suggest that the EDF is increasingly including the promotion of democracy, the rule of law and respect for human rights and fundamental freedoms in the design of its actions in other sectors but that the volume of commitments to dedicated projects in these areas has decreased.

**Accessibility for persons with disabilities:** No specific data are collected on this issue and the only evidence collected from the few case studies points to a general lack of awareness about the issue among EUDs. Some delegations address this under the broader label of "vulnerable people".

**Conclusion:** The evidence reviewed by the team suggests that progress has been mostly achieved in areas where clear policies, guidelines and measures have been issued and implemented (e.g. gender).

36. Finally, in terms of monitoring and reporting (M&R) systems for development outcomes linked to the MDGs (and now the SDGs), EDF10 country strategy evaluations show that in the 15 cases reviewed, countries' domestic M&R and statistical systems were often very weak, not results-oriented and not used for national decision-making, whilst EU project-level M&R systems also fell short of expectations in this regard (see Annex 17). More widely, it was recognised by both external evaluations and Court of Auditors (CoA) examinations<sup>22</sup> that the EU suffers from weak systems for monitoring the effectiveness of its cooperation results whether at country, regional or intra-ACP level. In EDF11 programming documents, sector intervention frameworks with performance indicators have been systematically included for supported sectors: they have been reviewed by HQ to ensure that proposed indicators are robust, data sources exist and numbers of indicators are realistic. However, the framework remains at sector level, in most cases without quantitative benchmarks or targets, and, more importantly, almost exclusively contains input, process and output indicators. It does not provide result or impact indicators that could illustrate the contribution or the link between the EDF's support and the realisation of EDF objectives, thus missing out on the possibility of tracking changes and performing a contribution analysis of EU aid (see also Annex 7).

Thus, although efforts are made towards better monitoring of the EDF portfolio's outputs, they fall short of the results-oriented management required for improved aid effectiveness, as has been repeatedly highlighted by existing evaluations and Court of Auditor reports.

37. At HQ level, an effort for improvement has also been made by the Commission to monitor EDF results with the launching of the EU International Cooperation and Development Results Framework in 2015 (design started in 2013 see EC, 2015x). Two annual reports have been released as of December 2016 covering projects ended between 01/07/2013 and 30/06/2015. They present the state of development progress in terms of SDG-like indicators, specific outputs achieved by the EU through its projects (e.g. number of km of road built, of rural farmers assisted etc.) and measures of the Commission's efficiency. However, they rely on project indicators, which have been criticised in existing evaluations for being mostly limited to input and output indicators. They also do not take account of the EU contribution towards outcomes from the considerable funding devoted to BS and pool funding. The extent to which these EU efforts at collecting more and better data<sup>23</sup> will contribute to facilitating the analysis of EDF contributions to results and impacts is thus not clear. This would require each project design and country engagement to include a credible theory of change, showing the manner in which outputs are expected to contribute to outcomes and impacts and what hypotheses were made for this to happen, and an associated monitoring of the theory of change's pivotal assumptions. Existing evaluations show this to be missing.

*JC 2.2 Extent to which the 10th EDF contributed to the delivery of positive results at territory, country, regional and intra-ACP levels compared to its objectives and specific EU priorities*

38. Multilateral aid reviews (DFID, 2013; MFA Netherlands, 2013; EY, 2014) found that the EDF has been critical for progress in MDGs and poverty reduction. Global, thematic and country strategy evaluations as well as CoA reports (see Annex 17) indeed provide evidence that EDF10 contributed to results in many sectors (transport, education, TVET, health, governance, human rights, certain aspects of decentralisation); however, it is also acknowledged that results are variable from sector to sector and from country to country. Although no sector stood out as having delivered better results than others, three patterns emerge from country strategy, thematic and instrument evaluations and CoA reports on EDF10 implementation. Firstly, BS had positive direct effects on macro-economic stabilisation, availability of resources, improved PFM, and to a lesser and less consistent extent on public policies. Secondly, in almost all cases, and especially so in road transport, results were expected to be jeopardised in the medium term by lack of domestic funding (of maintenance and/or operational costs). Thirdly, in many cases, EU activities were fragmented and lacking a strategic approach, which undermined their effectiveness. On the basis of documents consulted, the least effective results were obtained in the water and sanitation sector, where less than half the projects looked at by the CoA met beneficiary needs, and in the creation of synergies between national and regional programmes. Another important observation in this regard is that none of the of the DEVCO-led thematic or country strategy evaluations attempted to look into the EU cooperation's impact at higher level (poverty reduction), except for the multi-donor BS evaluations undertaken since 2012. Here (Fiscus, 2014) findings for the four LICs (Mali, Mozambique, Tanzania and Zambia) show that Mali experienced a significant reduction in income poverty levels while the four LICs experienced a significant reduction of non-income poverty and the improvement of social welfare during the period of BS provision.

39. At regional and intra-ACP level (see Annex 7), EDF10 evaluations show that results have been difficult to identify due to poor definition of what was to be achieved and to poor M&R. Where identified, results achieved from regional programmes were very limited in terms of regional integration, Economic Partnership Agreement (EPA) and domestication of regional priorities. For intra-ACP, EDF10 results in different sectors and areas are found to be more positive, with special mention of achievements of the contributions to (i) the African Peace Facility and strengthening of political stability (see Box 6), and (ii) the Global Fund to Fight Aids, Tuberculosis and Malaria and the Global Partnership for Education, both of which have a deliberate poverty focus. According to the Cotonou evaluation (EC, 2016b) and interviews at Commission HQ, the effectiveness of result delivery at regional and intra-ACP levels is weakened by several factors, including the poor quality of strategies, an emerging but still inadequate results orientation, limited cooperation capacity to

transpose regional laws into national systems, and weak monitoring and evaluation systems, as seen above.

### *JC 2.3 Extent to which the 11th EDF takes account of impact and sustainability requirements*

40. To the extent that most of the EDF11 is still to be implemented, the evaluation goes one step further than the previous analysis and looks at the factors that may be propitious to lasting effects of EDF contributions to country development outcomes. Under the assumption that programme and project designs correctly apply sustainability testing, ensuring sustainability for EDF-supported interventions mainly implies (i) the existence and use of monitoring systems that focus on results and their sustainability, and (ii) a careful monitoring of regional, country and project environments (and in particular of the key assumptions made in the theory of change), so that country or regional engagement and interventions can be adapted where needed. Whilst both these factors are under the Commission's control, the main factor for ensuring sustainability is not: recipient country governments must remain committed to reforms, policies and measures supported and agreed in the NIP within the agreed medium-term public financial framework.

41. As was seen above (¶31), monitoring systems used to keep track of country outcomes and impacts were found to be weak by all EDF10 evaluations and the recent efforts to improve monitoring stop short of delivering information on outcomes and impacts and thus on the lasting value added of EU support. The importance of monitoring systems that reach out to result, outcome and impact levels has also been highlighted by the country strategy evaluations of EDF10 implementation. All of these except one (Zambia) attest to the general lack of sustainability of EU results, especially acute where the EU has withdrawn its support. Various explanatory factors are proposed by these evaluations, including foremost the weaknesses in monitoring outcomes and impacts where a focus on inputs and outputs does not provide managers with the information necessary to correct the course of action where necessary to ensure impact and sustainability. This, and the insufficient number of ex-post evaluations, was also confirmed by CoA reports on energy, water, blending and climate.

42. Other specific reasons for lack of sustainability of actions were identified in evaluations as the undertaking of actions without addressing strategic issues in the sector (including institutional weaknesses) and the lack of government commitment to reform, often seen in insufficient (operations and maintenance) funding of sectors supported by the EU. This finding was also confirmed by the CoA reports on support to water and sanitation (ECA, 2012b) and on road support (ECA, 2012a). EUDs recognise that government commitment to reforms is essential to the effectiveness and sustainability of EDF support and evidence shows that they keep very close tabs on this: monitoring of government policy implementation is being reported on routinely in the EAMRs, in the Risk Management Frameworks (RMFs) and in the BS disbursement files. However, RMFs were not used as management tools in the countries visited and, as pointed out in one of the CoA reports (ECA, 2012a), government commitments were often not binding so that implementation or funding of reforms were often not realised.

43. Another factor threatening sustainability emerging from the review of country strategy evaluations and country visits was EU withdrawal of support from sectors without having discussed and implemented a viable exit strategy: as illustrated in Box 1 above, the sudden withdrawal of EU support from transport infrastructure has jeopardised the sustainability of achievements in this sector in several countries.

44. On the whole, evidence from the EDF10 evaluations shows a poor record of EDF interventions on sustainability and EDF11 has not addressed this issue either, even if a start has been made with the EU Results Framework to try and establish some longer-term track record of results which are attributable to EU interventions. The choice of sectors to support and the formulation of exit strategies where required, the design of operations, the accountability towards government commitments, and the monitoring and reporting systems all still lack sufficient emphasis on sustainability.

45. For the OCTs, and as highlighted in Annex 8, there is evidence of positive results achieved under the EDF 10. Nevertheless, OCTs feel that the EDF structures and procedures are a major

barrier to efficiency and effectiveness. Efforts toward regional integration have not been as successful for various reasons. There are indications that the situation is improving under the EDF11 with a stronger focus put on the alignment of the themes of the regional programmes for the ACP countries and the OCTs.

### **2.3 EQ3: To what extent is the EDF delivering efficiently?**

#### *Summary response to evaluation question*

Operational efficiency of the EDF11 has seen some progress, but there has not been a radical transformation of EDF systems and procedures which remain long and heavy. In the case of project identification and formulation, the process is justified by the logic of the process and its contribution to project quality.

Efficiency measures introduced under the EDF11 have started to deliver results. Some of the measures are likely to have negative consequences that might not have been adequately considered during their design. Efficiency bottlenecks continue to exist, including the functioning of the NAO office in some countries and the EU IT systems.

Budget execution has improved under EDF11, but some obstacles remain at the country level related to technical issues.

#### *JC 3.1 The EDF has been implemented in a timely manner*

46. This JC looks at the different stages of the EDF cycle to examine whether it has been implemented in a timely manner and to explore any obstacles encountered in the process. It looks at the efficiency of the EDF programming, project formulation, and implementation and budget execution.

47. Guidelines for country programming were made available in a timely manner, but the process took a long time to complete. It comprised two stages, separated by a review at HQ level (Annex 18, Part A). The accrued delays in the approval of the NIPs were the results of delays in phase 2 of the process. Phase 2 of programming was launched eight months after the deadline of phase 1. This delay is explained by disagreements on the choice and definition of priority sectors between EUDs and DEVCO's HQ which resulted in long discussions where the views of HQ were generally imposed (see section 2.1, EQ1). The problem may have been compounded by the lack of any preliminary financial figures attached to the guidelines. This most likely limited the progress of the programming negotiations, especially as a new allocation formula was introduced in EDF11 to implement the principle of differentiation and significant changes were expected in some countries (see EQ1). Additional delays during phase 2 of the programming process (approval of NIPs) were mainly due to the EU elections. Between the elections (20-25 May 2014) and the appointment of the Commission (1 November 2014), high-level decisions could not be taken. In addition, in several countries, delays have been attributed to a changing political situation (elections, fragile countries) and weak capacity on the government side (see Annex 11).

48. At the regional level, programming guidelines were issued very late compared to national programming guidelines since they date from December 2013 (EC, 2013b, see Annex 18, Part A). The delay in approving the guidelines is explained by lengthier than expected negotiations following changes to the governance of the regional funding lines (e.g. direct access modality and negotiations of a single RIP for the Eastern Africa, Southern Africa and Indian Ocean regions that had independent RIPs under the EDF10). The complexity of regional structures and the lack of capacity of regional organisations have also been highlighted as explanatory factors for the delays (see Annex 11). However, interview evidence has indicated that the regional programming started much earlier, and that in fact most of the programming was done before the regional programme guidelines were finalised, thus making for a much longer preparation period that is comparable to that of the NIPs (see Annex 7, Meeting Notes (MN) 327, 380).<sup>24</sup>

49. Despite the delays experienced in the programming process (on average 28 months for NIPs and 18 months for RIPs; see Annex 18, Part A), no evidence of negative impacts on the

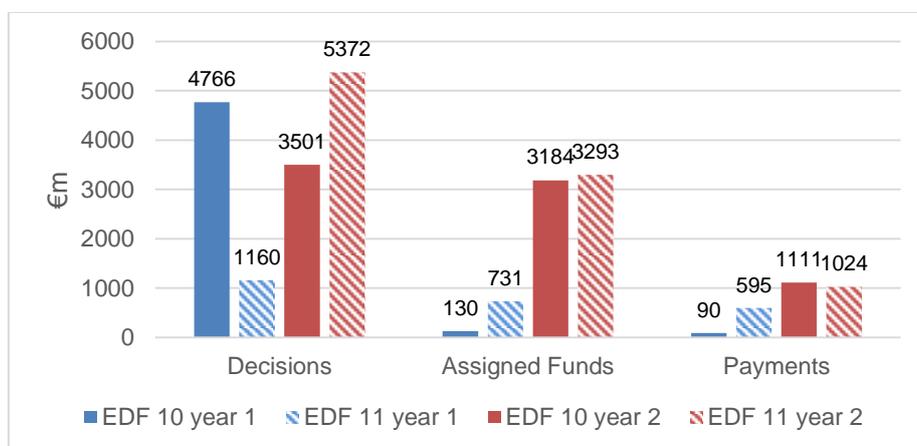
deployment of the EDF in ACP countries has been found. This has been attributed to the use of the EDF Bridging Facility, which allowed the EDF to operate while the EU MSs ratified the internal agreement, and to the implementation delays of the EDF10 (EU, 2013, EU, 2015, MN 38, 327 and 381).

50. The assessment of the identification and formulation stages focuses on the analysis of the “pipeline”. This approach keeps the evaluation focused on the EDF procedures. The “pipeline” is a formal stage comprising different steps that start with the finalisation of the action document and extend until its final approval (see Annex 18, Part A).

51. The pipeline procedures add substantial value to EDF projects and help to improve several aspects linked to project design. The EDF evaluation team has assessed the contribution of two of the most important steps in the pipeline to the quality of EDF projects: Quality Support Group (QSG) 1 and QSG 2 (see Annex 18, Part B). During QSGs 1 and 2, officials at DG DEVCO and the EEAS have an opportunity to review EDF project formulation documents and make recommendations for improvement. The EU procedures describe a logical separation and sequencing between QSGs 1 and 2 (EC, 2015f, pages 113-117), with QSG 1 focusing on examining relevance, objectives and selecting the aid modality and QSG 2 paying more attention to the technical and operational details of the projects. The analysis of other steps has not been possible because of a lack of records on their outcome. The analysis of a sample of projects shows that during QSG 1 and 2 projects are thoroughly reviewed across different areas and recommendations for improvement are made. In addition to the resulting improvements in project quality, this result suggests that project documents get reviewed more thoroughly than is suggested in the procedures and aspects covered in QSG 1 are revisited in QSG 2. In this regard, QSG 2 also helps to assess whether previous comments were implemented and provides an additional opportunity for participation.

52. Efficiency of budget execution has been assessed at two different levels. At the global level, the amounts allocated to each decision (i.e. commitments), assigned funds (i.e. amounts contracted) and payments (i.e. disbursements) have been assessed for the first two years of implementation of EDF11 and compared to the same period for the EDF10 – see Figure 2 below. This suggests that in year 1, EDF11 was executed much more efficiently showing a much better ratio of assigned (contracted) and paid (disbursed) funds compared to the volume of decisions (commitments). If the two years are aggregated, the efficiency of the EDF11 is considerably higher. By the end of the second year, 62% of all committed funds had been assigned and 25% paid (EC, 2016e). In comparison, by the end of its second year, the EDF10 had assigned 40% of all committed funds and paid 15% of them (EC, 2016e). The performance of EDF11 looks even better if one considers that EDF11 covers a period of 7 years, one more than EDF10. The following section (¶56ff.) provides additional analysis on some of the possible reasons behind this progress.

**Figure 2 Budget execution EDF11 and EDF10**



Source: EC, 2015w

53. The second level is budget execution at country level. This complements the analysis conducted above and provides detailed information that contributes to explaining the problems in

execution. The analysis is based on the information concerning payments, contracts and decision execution rates reported by the research sample of 25 ACP countries in the 2015 EAMRs (see Annex 18, Part A, section 3).

54. Budget execution faces some clear difficulties in the sample of 25 countries. The analysis of the explanatory factors behind the poor performance shows that methodological and technical problems are the main explanatory factor (see Annex 18, Part A). This includes mistakes in encoding projects, bugs in the IT system, divergences in the data recorded in central databases, delays in updating/creating the entries in the central databases and the use of a risk adjustment factor (as the risk increases the real amount is adjusted downwards). The main problem with the risk adjustment factor is that it does not necessarily reflect the reality. The amounts are adjusted downwards, but some decisions, contracts and payments either get executed in full or do not get executed at all. Interestingly, EUDs in some countries attributed the lack of performance to projects advancing better than expected, resulting in payments and contracts awarded in an earlier financial year than initially forecast. This is possible because budget execution indicators do not differentiate between delays or earlier disbursements. On other occasions, EUDs attributed the lack of performance to the effort made by the staff to ensure execution objectives were achieved. For example, efforts to execute enough payments by the end of the year resulted in too many payments being made. External factors such as delays in works or the political situation of the country are also important in providing explanations.

55. The mix of explanatory factors shows that indicators used by the EC to monitor budget execution are not able to discern and incentivise the right type of behaviour and helps to explain why this system has attracted some criticism (MNs 204 and 381). Sometimes the pressure generated by the Key Performance Indicator (KPI) can become a negative incentive (e.g. not to speed up payments of a project going well or to pay invoices without making all necessary checks). Another concern is that the threshold used to define whether execution is good (green) or inadequate (orange) is arbitrary in the sense that a KPI value of 90% is qualified as green while a KPI value of 89.9% is qualified as orange.

### *JC 3.2 Implementation was facilitated by new EDF procedures*

56. This JC explores the impact of new EDF and EU procedures introduced in EDF11 on the efficiency of the instrument. New procedures have different origins: changes in the EDF design, broader changes introduced by DG DEVCO and efforts to harmonise the EDF with other EFIs. This JC also discusses the existence of bottlenecks identified during the evaluation.

57. Evaluations of the EDF10 showed that despite efforts to streamline EDF procedures they remained burdensome, created delays and put strain on partners with low capacity such as NGOs (see Annex 14, OECD, 2012, MFA Netherlands, 2013). Under the EDF11, streamlining efforts were continued with the adoption of specific measures in the regulatory framework and two initiatives which targeted some efficiency-related aspects of the instrument, namely DEVCO's "simplification process" and the harmonisation of the implementation rules among EFIs, which also affected the EDF.

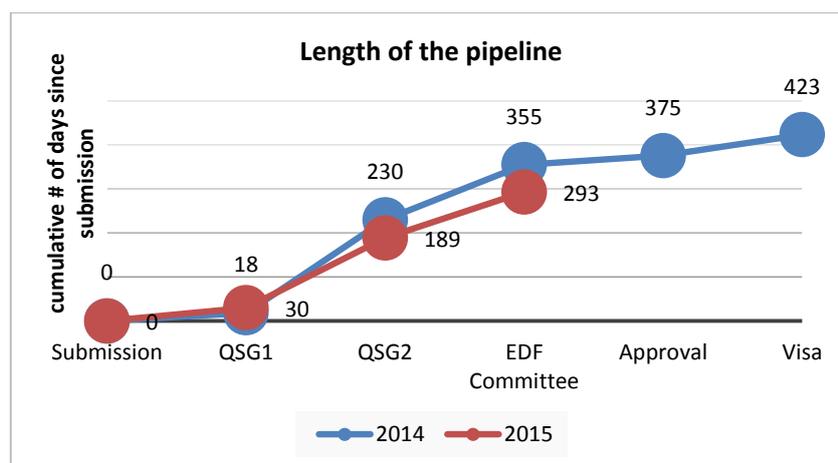
58. The comparison of the EDF10 and the EDF11 regulatory frameworks shows that two measures were introduced in the EDF11 that are closely related to the efficiency of the EDF programming and implementation (see Annex 10). The first measure is the simplification of programming documents that should make possible the full alignment of the NIPs with the country's national plans and to synchronize it with the national planning cycle. This measure should have a positive impact, mainly by doing away with the need to develop country strategy papers for all ACP countries (EC, 2016f). However, the efficiency gains resulting from this process cannot be quantified accurately because of the lack of comparative data on the EDF10.

59. The second measure targets the implementation of the EDF at the regional level. Regional execution under the EDF10 was very poor. By the end of 2010, two years after the launch of the EDF10, only 20% of the regional funds had been committed and only 0.5% had been disbursed (EC, 2015s). In order to improve EDF implementation and execution, a "direct access" modality was introduced, breaking the implementation monopoly of authorised regional organisations. Under this

modality projects with a regional dimension can be implemented by national administrations or other regional actors. Budget execution has improved significantly in the EDF11 even if execution figures remain low. By Q3 2016, approximately two years after the launch of the EDF11 – though, as explained above, there were delays – approximately 40% of the regional funds had been committed and 7% had been paid. Figure A.56 and Figure A.57 in Annex 18 provide additional supporting evidence. On a different note, potential beneficiaries (e.g. CSOs) are unaware of the intra-ACP and regional institutional set-up and procedures (see Annex 7). This could limit the participation of certain actors in intra-ACP and regional projects.

60. In 2014, DG DEVCO launched the so called “simplification process” (see EQ2, section 2.2). DEVCO has made substantial progress on the implementation of the recommendations and there is evidence of efficiency gains in some areas even if, as mentioned in EQ2, many interviewees had not seen overall improvements. For example, delegating the responsibility for amending contracts and commitments to EUDs has reduced the average length of these processes from 75 to 12 days (EC, 2015t). The average length of the QSG pipeline has also seen efficiency gains, with the total number of days from submission until discussion at the EDF committee decreasing from 355 days for projects entering the pipeline in 2014 to 293 days for projects entering the pipeline in 2015 (see Figure 3 below and Annex 18, Part B). The lack of enough data points for the last two stages of the process (many projects have not made it all the way through) does not allow for a full assessment of the cycle, but additional efficiency gains are also likely to be achieved in these final stages. In 2014, it took an average of 48 days between project approval and the visa (signature by DEVCO’s management). In comparison, in 2015, most visas were provided within two weeks of the project approval (EC, no date (a)).

**Figure 3 Length of the pipeline in 2014 and 2015**



Source: based on the analysis of the EDF pipeline files

61. Despite the efficiency gains recorded in some areas, the general perception of EDF procedures has not changed substantially at EUD level. There is awareness of improvements especially among contract and finance staff, but most operational staff have not perceived any improvement (see EQ2, ¶34, and Annex 17). This can be explained by a combination of different factors. Firstly, some measures have been introduced very recently and the systems and staff may require some time to adjust. Secondly, the simplification process has resulted in frequent updates to key guiding documents which initially create important challenges for the staff. For example, the companion, the guide for all development cooperation procedures, has been updated four times in 10 months (MNs 204 & 381). The templates used for delegated cooperation (PAGODA) have also been modified several times and many projects had to be adapted or put on hold (MN204, MN274, MN444, MN148, MN322). Thirdly, some of the simplification process was devised to mitigate the impact of staff reductions in DEVCO and it is possible that some of the efficiency gains have been cancelled out by a reduction in staff numbers.

62. While the simplification process has aimed at delivering efficiency gains, it is not clear that the impact of these measures on other aspects, including the partnership spirit of the Cotonou

Agreement, has been adequately factored in (see Annex 15, MNs 401, 462, 468, 494). For example, the tendency to use larger contracts (aggregation) is likely to limit the direct participation of local organisations, which are unlikely to have the systems and capacity in place to manage large grants. Sub-granting has been proposed and used as a solution, but this makes smaller organisations dependant on a reduced number of large and often international organisations that can meet the requirement to access EDF funding. The increasing use of delegated cooperation could come at the expense of the visibility of EU funding. Delegated cooperation also introduces an additional organisation between EDF funding and project beneficiaries. This approach could limit the EU's capacity to directly advocate for key values and principles unless (a) the intermediary organisation shares EU values and (b) the intermediary organisation has superior knowledge of the beneficiaries. Finally, the simplification process is regionalising finance and contracts units, something which might constrain the efficiency of EDF implementation in the future (see Box 5).

#### **Box 5. Regionalisation of finance and contract units in EUDs**

The simplification process has promoted the regionalisation of finance and contracts units in order to compensate for the reduction in staff numbers. In some EUDs, specially the smaller ones, finance and contract functions have been transferred to larger offices in the region. This is the case for the EUD in the Dominican Republic, which is currently responsible for Cuba, Jamaica, Belize and Turks and Caicos. Similarly, finance and contracts in Guyana, which is responsible for Aruba, Curaçao and other territories, has been moved to Barbados. While this move is understandable from an organisational and management point of view, there is some uncertainty about its impact. The proximity of finance and contract staff to operational officers is considered as very positive because it simplifies consultation in case of doubt and the exchange of views on technical aspects of the procedures, thereby contributing to filling any gaps in the knowledge of operational staff. This role of the finance and contracts units will be harder for the regional offices to fulfil. In offices where the operational staff lack a good knowledge of EU contracts and procedures, there are concerns that implementation can become more inefficient as consultation requires additional efforts and any weaknesses or mistakes are more likely to be identified at more advanced stages in the process.

Sources: MNs 192, 204, 462, 492.

63. Within the harmonisation process, the most relevant measure from the efficiency point of view is the alignment of the EDF rules of origin with those applicable to all EFIs. (see Annex 10). Rules of origin under the EDF11 have been harmonised to a large extent with those used by all other EFIs when it comes to thresholds and procedures.<sup>25</sup> This means that all EFIs can now use the same templates. However, small differences remain that still require a detailed review of the EDF regulations to ensure compliance (MNs 204, 381). In general, the harmonisation of the rules of origin has made things easier when tenders are required (MNs 204, 239, 38). The total harmonisation of rules of origin between the EDF and other EFIs is desirable from an efficiency perspective, but this requires amending the Cotonou Agreement, which is a complex process. While the harmonisation process has simplified things for the EC, NAOs noted that the process introduced complications for them by aligning EDF procedures to those of budget instruments (MN 325).

64. In addition to measuring progress, the research has also identified a number of bottlenecks in different areas that, if addressed, could result in additional efficiency gains. The NAO is perceived in some countries as an obstacle in terms of efficiency (EC, 2016b, ADE, 2014b, ECO Consult, 2011c, ADE, 2014c, MNs 6, 16, 29, 42, 203, 218). One frequent complaint is the lack of capacity of the NAO office to manage EU procedures in a timely manner, despite significant investments in capacity building. The role of the NAO in managing EU procedures is not necessarily linked to the performance of other functions such as coordination or ensuring EU visibility. Another complaint is that the role of the NAO is reduced to authorising a project even when the project does not require any other type of involvement on its side. This can create unnecessary delays. In addition, NAOs sometimes centralise political power and EDF projects can be held hostage to political differences within the government.

65. Other bottlenecks include the complexity and limitations of IT systems such as CRIS? ABAC? (see JC 3.1 and MNs 204, 381, 477). At country level, there are also substantial problems with the reimbursement of Value Added Tax (VAT) expenses, which restricts the ability of the EDF to work with certain actors (MNs 209, 121, 172, 257). Although the problem can be attributed to

partner countries' regulations, there is evidence that other donors facing similar problems have been able to absorb some of the burden on beneficiaries by procuring on their behalf or leading the reimbursement claims.

## 2.4 EQ4: To what extent do the EDF Programmes add value at country, regional and intra-regional levels?

### *Summary response to evaluation question*

The EDFs added value/comparative advantage comes from a unique combination of features: size, geographical scope, the medium-term horizon and predictability, partnership, ownership, the range and weight of financial modalities it employs, and the different levels at which it operates. The EDF's unique combination of specific characteristics gives it leverage which other EU instruments and other DPs and MSs do not have. The EDF also plays a role in regions, countries, sectors and priorities which is different from that of MSs, other DPs and EFIs.

The EDF can mobilize large amounts of grants over a long period, allowing it to make a significant difference in sectors which require high volume funding. The EDF gives a presence and represents EU interests in countries where (many) other donors are not present, and in regions where the EU has territories (Caribbean and Pacific). The other EFIs fill gaps that the EDF (because of some of its distinct features, e.g. ownership by government) cannot address.

The regional and intra-ACP cooperation provide unique opportunities to address issues which are beyond the reach of national cooperation instruments, and of individual MSs and DPs. However, the EDF has challenges in making the most of its unique combination of features in practice.

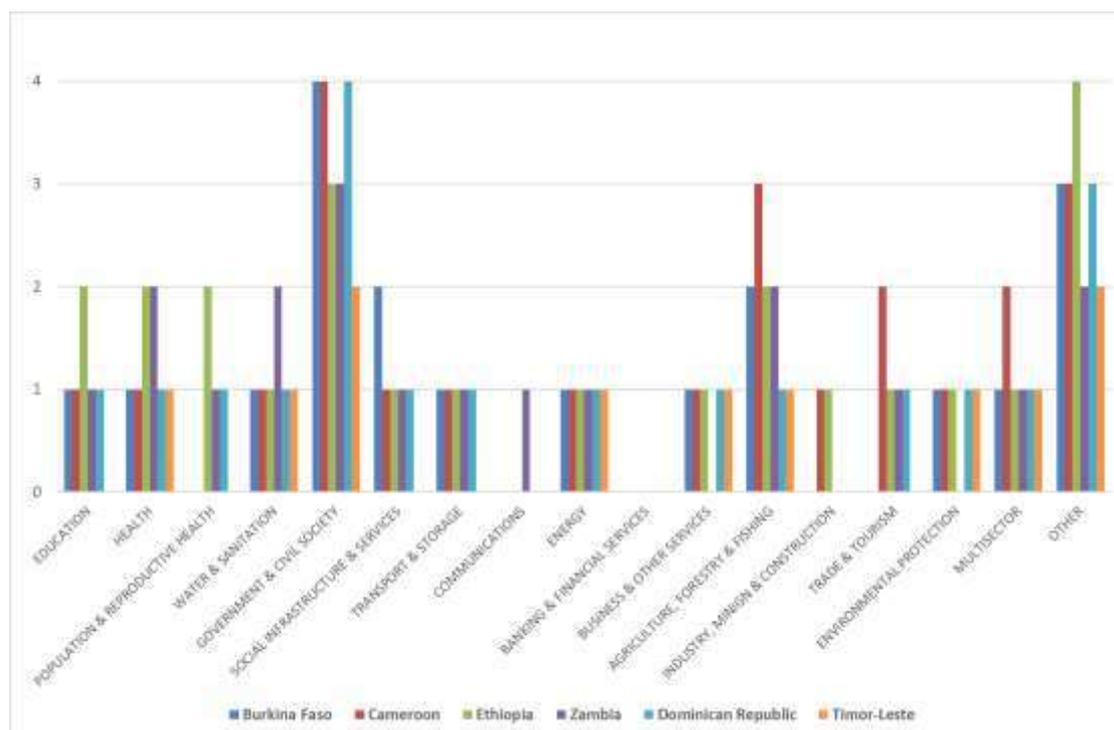
### *JC 4.1 Extent to which the EDF supports sectors and priorities at country, territorial, regional, and intra-regional level not supported by other EU instruments, MSs or other donors.*

66. The first JC examines whether the EDF has a particular niche in terms of doing what MSs, other donors and EFIs do not do.

67. **Evidence of overlap or duplication with EFIs:** Before examining the evidence, it is useful to be reminded that the EDF and EFIs have sometimes overlapping remits (see ¶104 and Table 3 below). As shown in Annex 20, Part B, this is particularly the case for the DCI's two thematic lines 'Global Public Goods and Challenges' (GPGC supports environment and climate change, energy, human development, food and nutrition security and agriculture, migration and asylum) and 'CSO and Local Authorities' and for the DCI's Pan-African Programme (PanAf). The DCI thematic and PanAf programmes are the closest to the EDF and require special attention in this analysis.

68. It is thus found that there is relatively little overlap/duplication between the EDF and other EFIs. The average number of EFIs<sup>26</sup> in sectors where the EDF is active<sup>27</sup> was looked at in the sample of field visit countries (excluding Aruba and New Caledonia where there is only one donor). As seen in Figure 4 below, the data show that in the vast majority of sectors there is only one other EFI operating alongside the EDF and that, as expected from the remit of the DCI, the agricultural and governance sectors (the latter including CSO and LA support) are the exceptions. The data confirm that the other EFIs mostly fund different priorities or support actions that might be difficult for EDF to support because of its specific characteristics (see section 2.5 on EQ5). Further analysis (Annex 20, Part B) also shows that overlap between EDF and EFIs has decreased between 2010 and 2015.

**Figure 4 Number of EFIs operating per OECD sector, 2015**



Source: authors, calculated from EU dashboard

69. **Evidence of absence of overlap and duplication with MSs and other DPs.** The analysis of the number of donors (MSs and DPs) per sector where the EDF is active shows that in about half of these countries some MSs and/or other DPs work in the same sector, although there is a trend towards division of labour shown by the reduction between 2011 and 2015 (Annex 19, Part E). The data make it difficult to conclude that the EDF adds value because it works in different sectors than MSs or DPs, although the evaluation did find a number of specific examples where the EDF adds value by supporting ‘orphan’ priorities (e.g. in Zambia the support to the aviation sector which is credited with having removed Zambia off the EU aviation black list). Case studies showed that there had been an effort under the EDF11 to adapt some of the choices to avoid overlap with other DPs.<sup>28</sup>

70. EDF’s value added compared to MSs and other DPs is related to its key characteristics (see JC 4.2 below) including its capacity to mobilize high volumes of grant funding and to do so over a long period which allows it to make a significant difference in sectors requiring high volume investments (such as infrastructure under the EDF10, and energy under EDF11) (OECD, 2012; MFA Netherlands, 2013; EY, 2014; ODI, 2012; Fiscus, 2014). The EDF thus “adds value by focusing on sectors where a critical mass is necessary” (e.g. in general budget support (GBS) and sector budget support (SBS), infrastructure and governance) (EC, 2011b and Herrero et al. 2015). The role of the other donors and MSs is complementary, for example by support to non-state actors, particular technical expertise, ensuring complementarity with other sectors they support (MNs 253, 421, 16, 34, 494, 300, 369.), or by pushing agendas that are more challenging for the EDF to promote given its direct relationship with government.

71. The EDF has a (potential) unique role vis-à-vis countries where it is the only donor, which consists of representing EU interests and values, and providing support for priorities that might otherwise not be funded through government programmes.<sup>29</sup> The evaluation of the French support to the EDF (EY, 2014), supported by findings from the country studies, suggests that in countries where the EDF is the main funder it allows for privileged relations in specific geographical areas where European territories are situated and with which the MSs have specific challenges (e.g. drugs, climate changes). The French evaluation also concluded (and this converges with interview evidence on this point) that this privileged relationship is not sufficiently exploited. Our analysis of the OCTs (Annex 8) shows that this is in no small measure due to insufficient tailoring of the EDF’s approach to the specificities of these territories and countries.

72. Findings on added value of intra-ACP and regional cooperation (Annex 7) show a strong potential offered by the unique nature of the instrument. There is a consensus that both mechanisms (regional and intra-ACP cooperation) provide unique opportunities in terms of value added, for the size and scale of programmes and for the capacity to address issues which would be beyond the reach of national cooperation instruments (EC, 2016b). Specific dimensions of regional and intra-ACP added value for stakeholders include the following:

- The African Peace Facility (see Box 6 below) is considered by several stakeholders, including Member States, as a significant value added and an area where Member States would struggle.
- Opportunities to support South-South mechanisms and for regional cooperation (e.g. with the organisation of African Countries of Portuguese Official Language) are very positively perceived.
- The intra-ACP has been the only external instrument supporting cultural values. The success of its programmes allowed the re-centring of culture as a priority for EU cooperation

### **Box 6. The African Peace Facility**

Another area that is supported by the EDF and that could not be supported by another EFI is the African Peace Facility (APF), managed by the African Union and which finances *inter alia* the African Union Mission in Somalia (AMISOM). The funding could not be provided by another EFI since the EU Budget is not allowed to finance any defence expenditure (here it is effectively funding operating costs and equipment but not armaments). The APF has supported stability in the region for the past 11 years, where the USA failed to do so, although external assessments point out that root causes of instability have not been adequately addressed by the Facility and OPC responses noted that the APF focusses insufficiently on attention to conflict prevention and peace building. The APF evaluation (IBF, 2011) highlighted the political success of the facility, although it noted its limitations related to effectiveness and performance; the evaluation pointed as well to the need to develop exit strategies for long-term peace operations, increasing African ownership and financial participation; other findings by the evaluation include the need for improved targeting, limited complementarities with regional cooperation, and the need to reinforce interactions with Delegations.

73. The capacity of MSs and other DPs to address regional integration and supra-national/global issues is limited. Thus there is little duplication with what the MSs and DPs do at these levels. Likewise, other EFIs do not have the capacity/ scope to address interventions at such a level. The regional and Intra-ACP programmes also – in principle – promote agendas that require the kind of breadth of engagement that the EDF offers through the large number of countries it works with.

74. The analysis of regional and intra-ACP cooperation (see Annex 7) shows however that multiple factors contribute to constrain the EU's cooperation capacity from tapping this potential to operate at a supra-national level: weak leadership, limited cohesion of the EU-ACP partnership as well as amongst ACP countries and regional groups, inadequate capacities for political and policy dialogue, limited effectiveness of regional integration, weak capacities of regional organisations and of the intra-ACP secretariat. The partnership added value of EDF11 is perceived as decreasing due to a combination of decreased involvement of stakeholders (including Government) in programming decision-making and the use of the EU TF and blending (see EQ1 and EQ3). Moreover, the added value of intra-ACP as an instrument has been eroded significantly by the dismantling of the intra-ACP unit, weakening a common vision,<sup>30</sup> dialogue and management of intra-ACP cooperation.

*JC 4.2 Extent to which the EDF offers a particular mix of expertise, implementation and financing modalities that other EU instruments, MSs and donors do not*

75. This question sought to establish whether the EDF as an instrument has a particular advantage/ added value over and above the contribution of other EFIs, MSs and DPs in terms of expertise, implementation and financing modalities. It is important to note that added value in terms of particular expertise does not refer here to particular sectors but rather to the instrument as a whole, and that added value implies a comparative assessment in terms of having a contribution over and above other actors. It should not be interpreted to mean that the EDF does not, in particular programmes and projects and through specific interventions, provide good expertise.

76. The nature of the partnership (with the Cotonou Agreement as its basis), the volume of the funding, the predictability and flexibility through the Reserve are the key areas that are consistently mentioned in global evaluations as constituting the main areas of added value of the EDF<sup>31</sup> (Annex 19, Part A). These areas are equally prominent in the interview responses (Annex 19, Part B). These areas of added value are important but the EU does not always manage to use the EDF to full advantage in these respects. This JC looks further at three key areas of assumed added value, namely expertise, implementation and financing modalities.

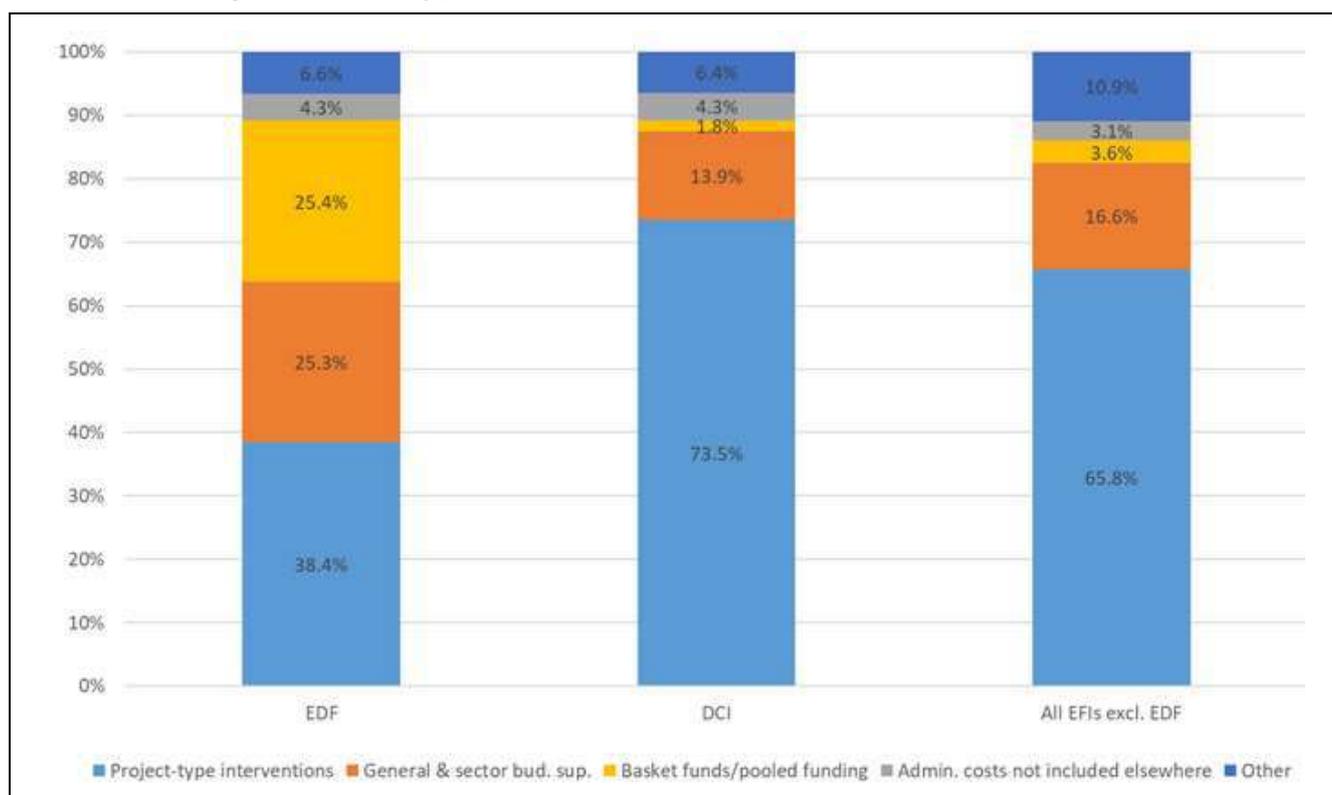
77. **Expertise.** Evidence converges in an overall finding that the EDF does not offer a specific added value in terms of expertise.<sup>32</sup> Most of the global evaluations that discuss the comparative advantage of the EDF do not highlight expertise among the areas of added value (OECD, 2012; Herrero et al. 2015; MFA Netherlands, 2013).<sup>33</sup> Only one third of the respondents to the CIR survey state that the EDF adds value in terms of 'particular expertise'.<sup>34</sup> The EDF rates lower than many of the other EFIs (Table A.53 in Annex 19, Part C).<sup>35</sup> None of the interviews<sup>36</sup> considered expertise as a particular added value of the EDF (Annex 19, Part C).

78. Further analysis of the interviewees (Annex 19, Part C) and the prior evaluations shows that expertise has been affected by a combination of staff reduction and loss of specific development expertise. Case studies and interviews point for instance to an EDF11 critical loss of 'savoir faire' and human capital in the area of infrastructure, where the Commission built up well recognized capacities at headquarters, in delegations, and in line ministries through sustained engagement over several decades. Interviews suggest that the OPTIMUS exercise as part of the multi-annual staff reduction plan has also affected expertise (e.g. in the Caribbean region the evaluation noted challenges related to inadequate preparation of staff for new roles). The evaluation also did not find evidence that presence in sectors such as agriculture, private sector development, health, education and environment supported the building up of a significant value added compared to other donors and development partners. For OCTs, the country studies and interviews highlight that challenges include that the expertise sourced by the EU often does not understand the specific conditions of the countries and territories.

79. The recent DFID review (DFID, 2016) notes that the shortcomings in terms of expertise have received attention from the EU since the previous Multi-Annual Review (MAR), that merging with EEAS has increased the number of delegations, and that the EU has drawn on MSs to strengthen its expertise through seconded experts (DFID, 2016). As noted in section 2.2 of this report, there are indications of a gradually improving staffing situation, although some challenges remain. The responses to the CIR survey and the interviews may therefore not yet reflect this evolving situation and/or indicate that while certain efforts are being made, other trends such as the staff reduction exercise and the regionalization of some of the services are running counter to these improvements.

80. **Implementation and financing modalities.** Use of aid modalities by EDF11 is different from that of other EFIs. A comparison of the modalities used by all EFIs and the EDF (see Figure 5 below) shows that the EDF makes more intensive use of (sector and general) BS and pooled funding. In terms of commitments, the EDF11 has committed a total of 25.3% of its funds for BS (of which 18.1% to GBS, and 7.2% to SBS), against only 13.9% for the DCI and 16.9% for all the other EFIs combined.<sup>37</sup> The EDF's use of BS is one of its key strengths acknowledged across the body of evidence reviewed (Annex 19, Part A and Part C, findings from DFID, 2016, EY, 2014, MFA Netherlands, 2013, and MN 788, 33, 203, 442, 95). The high volumes of aid the EDF can mobilize for BS are critical in facilitating policy dialogue (MFA Netherlands, 2013; OECD, 2012). Evidence suggests that BS facilitates a direct relationship to government and thus an entry point to both policy dialogue (e.g. on PFM and governance) and political dialogue (especially where GBS is provided, for which the respect of fundamental values is a prerequisite) which is not as easily achieved through the other instruments. This combination of volume and the modality is consistently highlighted as a particular comparative advantage of the EDF (see Annex 19 Part C, and section 2.2), and, although some believe that the potential of this relationship could be better explored, it remains clear that other EFIs do not have the required characteristics to engage in this manner.

**Figure 5 EDF types of aid compared to DCI and other EFIs (2014-2015)**



Source: EU Dashboard data (analysis by the evaluation team)

81. For EUDs the size of the engagement is the most important added value of the EDF (97% of responses on the CIR survey), and given what is stated above most likely linked to the second most important area of added value which is political influence (79%) (Annex 19, Part C) of which an example is provided in Box 7 below. Table 2 shows that in comparison, selected other EFIs are rated much lower in terms of their added value in these two area.

**Table 2 Added value of the EDF and a selected other EFIs (CIR Survey Responses)**

Response options	EDF responses	DCI geographic bilateral	DCI regional	DCI CSO	EIDHR democracy	EIDHR Human Rights
Size of engagement	95%	56%	41%	51%	38%	38%
Particular expertise	36%	28%	38%	11%	58%	54%
Political influence/leverage	79%	58%	38%	42%	54%	55%
Speed of mobilizing or engaging funds	5%	3%	3%	10%	17%	8%
Other	21%	11%	11%	17%	4%	20%

82. While some evidence indicates that recently BS has lost leverage (EC, 2016g) evidence from the case study in Zambia suggests that for partner countries, BS (and EU funding in general) has a renewed level of attraction as it is grant funding (as opposed to loans), comes without the additional agendas (or with agendas that are considered more neutral), and provides a welcome balance in the new geopolitical configuration (with emerging new powers and different agendas (MN 741, 87, 223, 486). For the MSs, interviews also suggest that the fact that the EU continues to engage and 'wave the flag' for BS is a key advantage because of the entry points and the perceived leverage that it provides, even if MSs may themselves for political reasons not continue to do so. This being said, there is also evidence that for specific territories/countries more attention is needed to specificities and less of a blanket approach around modalities (e.g. Aruba).

## Box 7. Findings on added value from Ethiopia

In Ethiopia the EDF has two specific areas where it provides added value that no other instrument could provide. Firstly EDF is able to support CSOs and human rights based activities by CSOs (and to a lesser extent advocacy) – whereas no other EU EFI or other donor is allowed to do so due to a Government of Ethiopia ruling that no external financing can be used for these activities (EDF is exempted because it is considered domestic financing for this purpose). Secondly the EDF supports the African Peace Facility which again no instrument funded from the EU Budget would be allowed to do (see Box 6 above).

83. A perceived added value of the EDF is also the existence of the Reserve which in principle allows it to be responsive to unplanned events, although as noted in EQ1 (¶28) the initially planned-for shock-absorbing mechanism has not yet been set up and actually accessing the Reserve has been reported to be at times very challenging for PCs (ODI, 2012; EC, 2011b) despite EU data showing that 31 countries/regions successfully received B allocations from EDF11 up to April 2017.

84. A specific area of potential added value is the support that the EDF is able to provide to regional integration (Annex 19, Part F). MSs and DPs have very limited facilities to address regional integration and supra-national / global issues. Likewise, other EFIs do not have the capacity and the scope to address interventions at such a level. Under the EDF11, funding for regional integration has increased (see Annex 7). It is too early to say whether this is making a difference.

85. The EDF is recognized as offering a strong opportunity for building a special position for the EU at regional and global level due to the same characteristics that are also important at the national level: volume of funding allowing the achievement of a critical mass, predictability and general neutrality, and added to this as noted before (¶72) the capacity to address a level of cross-country/regional interventions which MSs and other DPs cannot achieve (EC, 2016b). While there is evidence from the Cotonou evaluation (EC, 2016b) that the EDF has provided an important platform for converging around regional issues of priority (migration, security, maritime issues, climate change etc.) most of the evidence suggests that the considerable potential of the EDF to make a difference is not reached in practice.<sup>38</sup> An ECDPM political and economic analysis points to a very limited added value of "*aid-based partnerships that consolidate dependency*" (ECDPM, 2015). The analysis in Annex 7 highlights several key limiting factors:

- The limited capacity of ACP – EU to build a common approach: EU and ACP constitute a group of 106 countries which could have a critical weight in shaping global issues. A rare example of cohesion is provided by a common ACP-EU front on the COP 21 agenda. But in general the partnership has very limited capacity to act cohesively – this is also a reflection of the weak internal cohesion of ACP and of the regional groups.
- Limited capacity of the EU to establish itself as a leader, at regional and at global level, with the EU being perceived more as a funding source than an actual player at these levels.
- Uneven results of regional integration, limited value added of Regional Cooperation, the lack of sustainability of the institutional set up, and lack of a system of reliable financial contributions from partner countries have been eroding the capacity of EU to build on regional value added.

86. In terms of triangular and South-South cooperation, the EDF11 does not appear to have made much progress. Of the sample of 23 NIPs that were analysed for the evaluation, only one included specific mention of the South-South cooperation.<sup>39</sup>

### *JC 4.3 Extent to which EU values and principles are reflected in its programming design of programmes and projects*

87. This JC examines the inclusion of values and principles in programming; evidence of stakeholder consultations in line with the principles of ownership; evidence of the inclusion of fundamental values in dialogue; and evidence of the EDF promoting regional integration.

88. As mentioned in EQ1 (JC 1.1 and JC 1.2) the EDF11 programming instructions took on board the aid effectiveness principles, but some of those – in particular the partnership and ownership principles were not fully applied in practice. Examination of the EDF11 NIPs<sup>40</sup> (see Annex 19, Part D) confirms that the majority of the NIPs (over 70%) include reference to ownership.

Only four out of 23 NIPS do not mention ownership or include only a weak reference. Furthermore, EDF11 programming included an extensive process of stakeholder consultations at country and regional levels (see section 2.1, JC 1.1, and Annex 9). While this was appreciated by stakeholders and has brought benefits (see section 2.5 below, JC 5.1), the analysis of the programming process (section 2.1, JC 1.2) shows the EDF11 took insufficient account of the contributions by stakeholders in the design stage, and priority setting was found to have been tightly controlled by HQ.

89. Under the EDF11 the EU's fundamental values (democracy, human rights, justice, rule of law)<sup>41</sup> have become an objective and a principle of development cooperation, as well as a factor guiding allocation, representing a change from the EDF10 (Annex 9 and Annex 10). Appropriately, the EDF11 has included attention to fundamental values in its programming. The analysis of the NIPs (Annex 19, Part D) shows that the majority of the NIPs reviewed (80%) show evidence of attention to fundamental values, such as human rights and justice.<sup>42</sup> Interviews with MSs and other stakeholders show them seeing the EDF as having a key potential role in promoting EU values although it does not always exert as much pressure as the size and potential of the instrument might suggest (MN 88, 192, 395). It is too early – and beyond the scope of this Performance Review – to assess to what extent the inclusion of these values will lead to effective action by the EDF in practice. However, it is to be noted that fundamental values are already taken account of in the EDF's allocation formula (through the allocation formula itself via the inclusion of the World Governance Index (WGI), which itself includes performance on the rule of law, and through the adjustment factor, which also can include fundamental value principles as shown in the cases of Benin, the Gambia and Guinea Bissau<sup>43</sup>). Fundamental values have also come to the forefront of any discussions around BS since they are, since 2012, one of the areas of prior analysis for BS eligibility, even though the respect by the PC of fundamental values is only required as a pre-requisite to BS where a Good Governance and Development Contract (GGDC) is provided.

90. The role of fundamental values in EDF fund allocations to countries and in assessing BS eligibility illustrate the importance taken by fundamental values in the EDF11 programming and implementation. An analysis of OECD markers on “participatory democracy and good governance”<sup>44</sup> combined with an analysis of the percentage of total disbursements going into key sectors shows also an increase in the percentage of commitments with participatory democracy and good governance as a significant objective in the period 2010-2015, but a reduction of projects with this as a main objective (see Annex 9). The combination of these two trends suggests that the EDF may be increasingly including the promotion of democracy, the rule of law and respect for human rights and fundamental freedoms in the design of its actions in other sectors, although the volume of commitments to dedicated projects has decreased.

91. Previous evaluations and interview evidence would suggest that success requires a combination of instruments and that in practice the degree of commitment and success varies from country to country.<sup>45</sup> The Cotonou evaluation (EC, 2016b), and selected interviews also underscore that while there is a role in principle for the EDF, in practice there is evidence of geopolitical and economic interests interfering with and watering down the EU positioning with the case in point being human rights.

92. While the EDF is able to include attention to fundamental values in programming, and offers the advantage of entry points into government that other instruments do not have in this respect (see section 2.6 on EQ6), it also has inherent limitations. These are related to its formal structures (requiring government/NAO approval) which can be a barrier to broader stakeholder support and participation and to concerted attention to fundamental values (see Box 8 below). Here other EFIs may play a key role in terms of providing the margin for manoeuvre or a stronger accent on fundamental values (see section 2.5 below, JC 5.1).

### **Box 8. Country findings on fundamental values**

**Zambia and the Dominican Republic:** In both countries EU cooperation promotes key EU values such as democracy and rule of law. These issues are raised as part of the political dialogue. The regularization of the status of displaced Haitians is an example of an area where the contribution of the EU is recognized and highly valued.

**Burkina Faso:** Several Government officials and CSOs highlighted the EU's contribution in supporting social

emancipation, fundamental values, in particular justice, and CSOs, although it was regretted that the support was often more in dialogue than in deeds (no direct support to strengthening CSOs in EDF10, no direct financing of actions to improve fundamental values except justice).<sup>46</sup>

**Ethiopia:** The EDF has promoted EU values and principles through its programmes and has played an important role in fostering the CSO sector (see Box 7 above), but has not been able to discuss fundamental values in political dialogue due to the political regime. The more recently agreed higher level dialogue between Ethiopia and the EU does not either table these issues.<sup>47</sup>

#### *JC 4.4 Weight in advocacy*

93. EDF programming includes specific plans/provisions for support in a majority of NIPs (Annex 19, Part D). A separate analysis of CSO participation in the EDF (Annex 15) finds that in most contexts the EU has ensured that CSOs are consulted by the Government on key areas. In terms of advocacy and public policy implementation the same analysis underscores that the EU – while not standing out for providing resources or building the ‘watch-dog’ capacity of CSOs – often uses CSOs in-country and at European level to broach difficult matters with the Government authorities where they are encouraged to push certain agendas forward with the authorities (see Box 6 and Box 7 above). Two major drawbacks were noted: (i) the EU usually wants only a single interlocutor (hence the push for umbrella organisations) even though within one umbrella organisation there may be many individual divergent voices, and (ii) being able to issue only one ‘general’ CSO message means that the message itself has to be diluted to a level where all members feel happy. The country studies, thematic reports and EAMRs also highlight specific challenges under the EDF11 in terms of reaching out to organisations that have an advocacy role, in particular related to larger grants and complicated procedures and sub-contracting (with the latter distancing the EU from the specific issues it wants to influence and favouring large NGOs to the detriment of smaller grassroots NGOs). There is some convergence of views from the country studies that while the EU is in principle in a better position to advocate than MSs and DPs it does not always do so in practice. These findings suggest that while there has been attention to bringing CSOs into planning and implementation processes, the EDF has not been particularly strong in building strong advocates, nor has it played a stronger role than MSs and DPs in this respect. Interviews and country studies suggest that this is in part related to the close relationship between the EDF and partner governments.

94. For the OCTs, the EDF adds value by linking them to Europe and through their position as European outposts. Even though the weight of the EDF is limited by its relatively small financial size in relation to the OCTs’ overall budgets, support to the OCTs as a group enhances their prominence as a platform in regional and global fora.

#### **2.5 EQ5: To what extent does the EDF facilitate coherence, consistency, complementarity, and synergies, both internally between its own set of objectives and programmes and vis-à-vis other EFIs?**

##### *Summary response to evaluation question*

The evaluation finds that the EDF11 has stronger coherence at national level and less duplication with regional priorities. Internal and external complementarity and synergies remain underexplored.

- EDF coherence at country level has improved through sector concentration. Aligning NIP and RIP priorities has reduced duplication but there is limited evidence of synergies between the two levels. Coherence with the Intra-ACP programme remains elusive.
- Complementarity with other EFIs results from their capacity to support priorities that the EDF – because of its objectives, long planning process, timeframe and ownership – cannot fund. Duplication exists, particularly with centrally managed DCI thematic lines, and generates a disproportionate burden on delegations. EC human resourcing has affected coherence, consistency and complementarity both internally and externally.
- External coherence with MSs and DPs predates the EDF11. There has been selected progress in joint programming. EC and donor HQ agendas affect coherence and

commitment in practice.

- There has been a greater focus on reporting on PCD under the EDF11. Internal reporting highlights instances of policy incoherence, but also suggests that there are different interpretations of Policy Coherence for Development (PCD) which may affect reporting.

*JC 5.1 Extent to which the 11th EDF is equipped to ensure coherence, consistency, complementarity and synergies between its own set of objectives and programmes*

**a) Complementarity between sectors and levels of the EDF**

95. This JC examines to what extent the EDF11 is coherent internally between the different levels at which it operates and with the other EFIs.

96. Evaluations of the EDF10 highlight insufficient interaction/harmonisation between different levels of EDF and insufficient EU internal coherence and duplication because of separate instruments, financial regulations and different logics (see Annex 20, Part A). Analysis of the programming instructions shows that there was no substantive change on coherence and complementarity between EDF10 and EDF11. The programming instructions for the EDF11 did, however, include a specific requirement that bilaterally funded sectors cannot be eligible for RIP funding. Thus, the instructions focused on avoiding duplication, but did not provide additional guidance on how complementarity might be achieved (see Annex 10).

97. The country studies find a good level of coherence in the sector choices at national level under the EDF11. This is reflected in the NIPs and in the choice of sectors that are mutually reinforcing, have intervention objectives that are complementary (e.g. Zambia, Burkina Faso) and focus on ensuring similar approaches to common issues (e.g. gender, CSO support, private sector engagement) across chosen sectors. This is not applicable to OCTs as these have one focal sector.

98. The search for complementarities across intra-ACP, regional and national cooperation has been sporadic; the achievement of synergies was constrained by limited dialogue across intra-ACP, regional and national mechanisms, inadequate national commitments to regional priorities, weak effectiveness of regional cooperation and also challenges in synchronizing planning cycles for the different levels of the EDF. The analysis of the RIPs, EAMRs and action documents also supports the finding of a more systematic focus on avoiding duplication and seeking to ensure complementarities in identifying priorities for regional cooperation. The requirement that EDF11 sectors cannot be eligible for RIPs, combined with sector concentration at country level, is found to have been important in avoiding duplication between national and regional programming (country studies from Aruba, Burkina Faso, Cameroon, Zambia). The EDF11 has included participatory planning through national and regional meetings. Interviews and country visits suggest that the participatory process has helped avoid duplication, although it has also been perceived as having been mostly HQ-driven and insufficiently responsive to suggestions made by participants (MN422, MN445, MN44 and JC 1.2).

99. The approach to regional priority setting has differed between regions. The Caribbean and African RIPs have identified sectors that are not duplicated with the national programming while the Pacific RIP has maintained the same focal sectors at both levels so as to strengthen complementarity and synergies and create a critical mass towards common goals. While there is no evidence to assess which approach might work best, there were views from interviews that the requirement not to fund the same issues at country and regional level may inhibit potential synergies. For example, country studies in Burkina Faso, Cameroon and Zambia highlighted concerns that the decision to engage in infrastructure from a regional perspective and to drop this from the country-supported sectors reduces the capacity to focus on pro-poor initiatives (e.g. rural road networks), reduces the capacity to influence national policies, and affects the potential to be synergetic with other sectors such as agriculture (see Box 1 above).

100. The different levels of EDF cooperation (national, regional and intra-ACP), offer the potential to develop significant strategic complementarities within the instrument, both across and within sectors. However, this potential is not tapped, as beyond the application of the subsidiarity principle during programming, interactions between intra-ACP, regional and national cooperation are very

limited. The complementarity between intra-ACP and the regional and national priority setting remains vague, as it had also been found to be for the EDF10 (EC, 2011b). While the evaluation's review of the intra-ACP portfolio highlights some strong choices for programmes that address issues that are overarching<sup>48</sup> there is a lack of clarity and involvement in how decisions are taken (MN 149, MN 447, MN 203, MN 270, MN 34, Annex 7). The country studies found no evidence that the intra-ACP programmes were complementary to national and regional programmes. None of the interlocutors at country level had a global (or even partial) picture of what was being done under the intra-ACP or how this might be complementary. EDF11 Intra-ACP programming was not coordinated and lacked consultation with EUDs and Regional Programmes. The ACP secretariat was not adequately involved in EDF strategies, design or implementation. In addition, the future capacity of intra-ACP to establish complementarities has been significantly affected by the 2016 institutional reorganisation. The fact that the intra-ACP coordination has been spread over a number of units in DEVCO has diminished capacity for an overall vision, management and coordination for the intra-ACP and could affect the capacity to develop complementarities with national and regional cooperation (see Annex 7). The regional cooperation between OCTs and ACP countries is a weak area which has seen limited complementarity (MN 85, MN 192, MN422, MN 445 and country studies) in part because of the diversity of priorities and different historical backgrounds, although the situation has improved since the thematic focus for the EDF11 under the OCTs' regional envelope has been climate change and biodiversity.<sup>49</sup>

101. The evaluation notes that the potential for synergies between national and regional efforts may continue to be affected by different programming speeds as was already the case under the EDF10.<sup>50</sup> Country and interview evidence also suggests that challenges remain with multiple organisations and overlapping regional bodies and with a lack of commitment by the national level to regional priorities, and that there is insufficient guidance on how complementarity can be achieved in practice (MN95, MN 445, MN 74 and Zambia, Cameroon and Burkina Faso country studies). Interviews at the Commission also show different interpretations between geographic and thematic directorates on the meaning of coherence and insufficient focus on monitoring of complementarity in practice.

#### **b) Complementarity of other EFIs with the EDF**

102. The review of the EDF10 evaluations shows that the European Union had not maximized its potential in terms of complementarity with other EFIs (see Annex 20, Part A). Two fundamental characteristics of the other EFIs that are operating in the EDF geographical area – and that have implications for complementarity – should be noted at the start. The first is that the thematic horizontal programmes are implemented using a horizontal approach (they are managed by Brussels who make the decisions on what programmes and projects will be funded). The fact that decisions are made at HQ makes complementarity a priori more difficult since it will be less contextualized than when the EUDs have direct decision-making power over them. The second is that annual programmes of the other EFIs are subject to the annuality of the EU Budget which can make it more challenging, while for the EDF portfolio preparation can last longer and not coincide with other EFIs' tighter preparation phases.

103. The EDF11 regulation specifies that other thematic programmes should be consistent with and complementary to the programmes funded under the EDF11.<sup>51</sup> However, the programming guidelines for the EDF11 (see Annex 10) did not provide specific instructions on how the complementarity with other EFIs was to be achieved.

104. The evaluation examined the regulations of the different instruments for complementarity of objectives, geographic scope, and sequentiality.<sup>52</sup> This comparison emphasized complementarity overall but also highlighted potential areas of overlap from a regulatory perspective, in particular between the EDF and the DCI thematic programmes (see Annex 20, Part B). Further evidence of complementarity between instruments is found in the responses to the CIR survey (see Annex 12 and Table 3 below). This is particularly the case for DCI-CSO LA, which complements the EDF by bringing in non-state actors in a more explicit manner (and without requiring approval of the NAOs); ECHO and IcSP, which address areas of urgent humanitarian need and thus come before the more development-oriented EDF (and have the flexibility that the EDF does not have) with IcSP in

particular offering an important entry point for EDF-funded resilience interventions; and EIDHR, which targets specific actors, also does not require approval of the NAO, and ensures that the EU intervention has a strong presence in terms of key European values. Similarly to the analysis of the regulations, the CIR survey (see Annex 12) also evidences that duplication arises in particular with respect to the HQ-managed budget lines. Other challenges mentioned in the survey include difficulties in transitioning from one instrument to the next, for example from IcSP to EDF support, because lack of synchronisation of time-lines leaves gaps in support (in part related to long lead-time for EDF project approval).

**Table 3 Complementary between instruments used by EUDs (CIR responses)**

Instrument & characteristics	EDF	EIDHR	IcSP	DCI Thematic
Overall strength of the instrument	Clearly supports government plans, including local governance. Takes over where humanitarian aid ends.	Supports actions not supported by government. Targets very specific actors.	Complementarity through focus on short-term emergency funding. Advantage of flexibility & rapidity.	Supports actions not supported by government.
Complementarity to the EDF	N/a	Allows for testing pilot approaches that can be followed by larger EDF interventions. Complements governance components of the NIP which are funded by the EDF.	IcSP tests pilot approaches that can be followed by larger EDF interventions. Offers an entry point for EDF-funded resilience.	Strengthens advocacy in EDF NIP focus areas. Complements sector EDF BS through support to communities & private sector. Provides additional resources where EDF provides core funding.

105. The evaluation finds that overall mechanisms and procedures are in place at the identification and the planning stages in the EDF which provide a framework for interaction between the thematic and geographic directorates and other key actors, and should ensure that duplication is avoided (see Annex 20, Part C).<sup>53</sup> Under the EDF11 the internal process of approval has been complemented by the introduction of internal reporting between different directorates<sup>54</sup> as well as with a system of country fiches<sup>55</sup> which are intended to further improve the overall view of each of the countries and the instruments that are being used. An assessment of a sample of the QSGs shows that on the whole the QSG process ensures interaction, although at times with variable levels of participation by the different units. This analysis also finds that while overall the quality of comments is good, there is less attention to synergies and complementarities than to other areas (see Annex 20, Part C). HQ and country level interviews also highlight the importance of the QSG process, and that in instances where this does not take place there are challenges in ensuring complementarity (see Box 9 below).<sup>56</sup> The interviews with senior management underscore that taken together these systems – if adequately used – should ensure there is no duplication and that complementarities are explored (MN2, MN29, MN6).

106. Looking at the evidence on the EDF11, the interviews, country studies, and reporting suggest that overall there was progress in reducing duplication between 2014 and 2015. This was achieved through a variety of measures, in addition to the strengthening of the internal reporting, including:

- Combining calls for different instruments/budget lines.
- Decentralizing the contract management arrangements to the EUDs. Country studies from Burkina Faso and Zambia show this has enhanced the coherence between projects.
- Raising the average grant per contract to address the issue of workload.
- Adoption of multi-annual plans by different instruments and directorates to improve complementarity and coherence.<sup>57</sup>

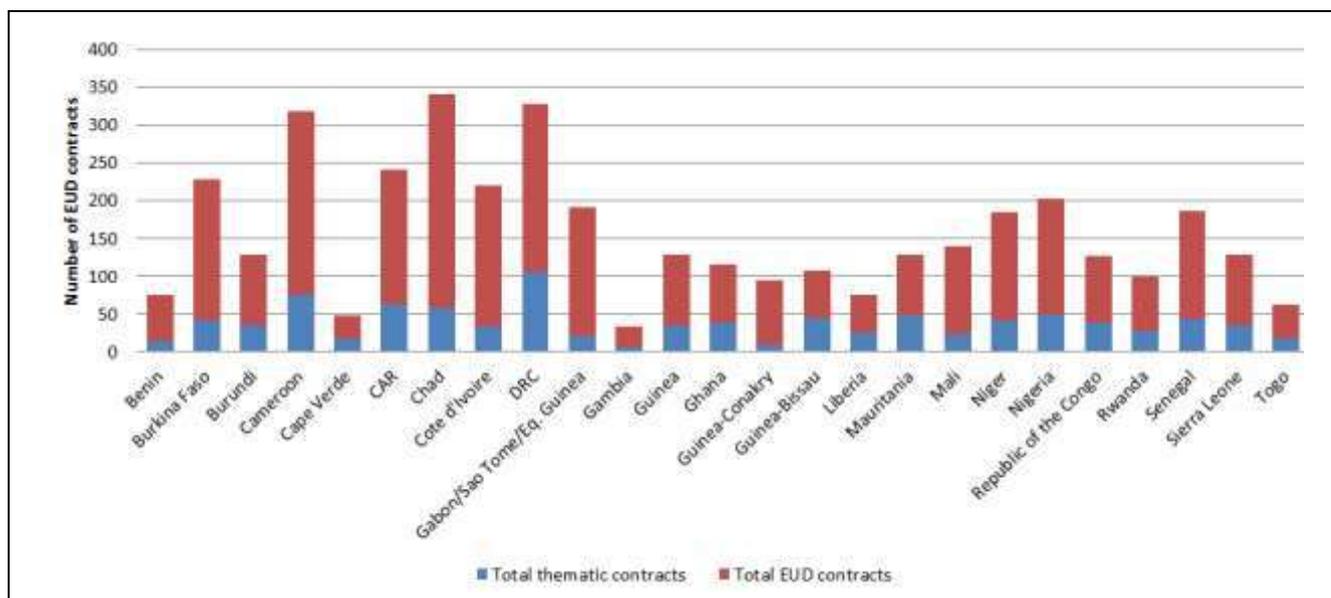
107. In spite of these improvements, the country studies, the CIR survey (see Annex 9), and the analysis of the thematic budget line reports (see Annex 20, Part E) converge in an overall finding that there is still room for further improvement, as is evidenced by the evaluation’s finding of duplication between the intra-ACP and the GPGC (DCI) with both mechanisms supporting sectors

that appear to be largely overlapping with the exception of the intra-ACP support to the African Peace Facility (see Annex 7). The following challenges to avoiding duplication and ensuring complementarity between instruments persist:

- Insufficient consultation with the EUDs in project selection, in particular for the thematic budget lines managed at HQ level and for the centrally managed EU TF (see Annex 20, Part B and Annex 12).
- Global calls and global priorities resulting in projects that do not fit into the Delegation's areas of concentration (increasing number of sectors of involvement),<sup>58</sup> that do not match the expertise at the EUD, and that reduce the value in policy engagement.
- A tension between the focus on increasing the grant sizes with the objective of supporting local actors and the low capacity of CSOs/NGOs in many countries. Interviewees at country level also expressed strong concerns about reducing the visibility of the EU and its capacity to engage with key priorities (see Annex 15).
- A high workload for the delegation from thematic programmes that have a comparatively small value financially and reduce efficiency (see Figure 6 below).
- Simplification measures that have not produced all the desired results/effects.<sup>59</sup>
- Different durations and operational modalities of the instruments which pose challenges to a transition approach between instruments, for example with the EDF requiring a long preparation period (2-3 years) while humanitarian efforts may only last one year.
- Complementarity of the EDF and other EFIs for OCTs (even when eligible) is limited by lack of visibility of these opportunities, lack of expertise (human resources), and parallel but unlinked programming exercises.

108. Senior management interviews at DEVCO and EEAS underscore that systems exist to ensure complementarity and synergies in planning, and that procedures are in place. Where this does not happen, it is related to insufficient commitment and institutional accountability for ensuring complementarity (MN29, MN2, MN741). Overall, the external interviews reflect the view that there are too many instruments and that it would be desirable to aim for simplification, with suggestions that this could be achieved through merging DCI and EDF (MN689, MN34, MN270, MN478, MN657). While this may be intuitively interesting, it would pose challenges as one of the key elements of complementarity between DCI and EDF appears to lie in the fact that the DCI enables the EU to engage with interests and actors without having to go through the government-managed NAO system.

**Figure 6 Thematic projects as total of EUD contracts in DEVCO E**



Source: Based on data provided in EC, 2016s

*JC 5.2 Extent to which the 11th EDF is equipped to ensure coherence, consistency, complementarity and synergies between its programmes and those funded by MSs and other DPs<sup>60</sup>*

109. This JC examines to what extent the EDF11 is coherent with the priorities of other MSs and DPs. As with the previous JC it examines the extent to which EDF11 programming and structures have been able to address the shortcomings.

110. EDF10 country and thematic evaluations present a mix of findings, with examples of complementarity between the EDF and MSs and DPs, as well as overlap and duplication (see Annex 20, Part D). The intra-ACP evaluation (EC, 2013d) found almost no evidence of overlap as this cooperation often finances programmes which cannot be financed under other financing instruments (because of their geographic scope and/or the volume of financing needed).

111. Analysis of the programming instructions for the EDF11 shows that programming with MSs and other donors<sup>61</sup> has been a strong feature of the EDF11 instructions, in line with the EU's commitments. Joint programming is specifically included in the EDF programming guidelines, in the instructions to the delegations, and in the reporting requirements of the EU (EAMRs), and there has been the inclusion of a section in the Action Documents and a standard Annex 2 of the NIPs with a donor matrix.

112. The performance review found considerable evidence of efforts in practice to make progress on joint programming under the EDF11. The EDF11 has included consultation and coordination with MSs, DPs and other financial instruments. Programmes are shared with EU member states at the planning stage with a focus on working in only three sectors to counter duplication and overlap (DFID, 2016). Activities by MSs and other DPs are integrated in most of the EAMR reports, as they are in the NIPs (see Annex 20, Part D) and in ADs. But while MSs and DPs are included in the EDF planning documents and reporting, the manner in which complementarity and synergies are expected to take place is only rarely given attention in the NIPs and EAMRs reviewed. The extent of involvement of MSs and DPs in regional and intra-ACP programming is considerably less than in national programming because of the lack of mechanisms for joint programming and the limited presence of MSs at regional and global level (see Annex 7). A similar situation appears to be present in other relatively advanced (MIC) countries, such as Namibia where joint programming was done with a very small number of donors (MN1 and EAMR). Joint programming is of more limited value for OCTs because the EU is often the only donor in these countries. In these cases, however, close alignment of the OCT strategy with that of the relevant MS is foreseen in the EDF11 programming instructions and was broadly in evidence from interviews and the country studies.

113. There are suggestions that at times the joint programming is too focused on the process, can be somewhat 'heavy handed', and in some cases the number of donors that are active in a sector continues to make the coordination challenging and complicates developing approaches to complementarity (interviews and country studies in Zambia, Cameroon, Burkina Faso). The Zambia case study showed that in spite of joint programming there were still instances where donors 'discovered' they were working in the same area. There are also reports of interference by HQ in joint programming efforts leading to changes in terms of what was agreed at country level (interviews and Timor Leste and Zambia country studies). Such interference is not unique to the EU and is also reported by MSs with respect to their HQs. An additional challenge is the lack of flexibility for the EDF11 (and for other donors) to adjust programming given long programming cycles.

114. Various sources (see Annex 12) evidence challenges to coherence and complementarity with the work of other donors, with a convergence around five main topics, some of which overlap with those identified under JC 5.1 above.<sup>62</sup>

- Insufficient coordination of HQ initiatives with EUDs, creating problems of coherence with priorities in the NIP;
- Challenges in staffing to manage the range of instruments and requirements;
- Challenges in transitioning between emergency and development instruments, with evidence of gaps falling between the instruments;
- Insufficient coherence/coordination between regional and national initiatives;

- Delays in approval affecting coordination with other donors.

115. Evidence from the country studies shows that it can be difficult to attribute improved coordination among donors just to the EDF, although there are examples where the EDF has contributed to it. For example, under the EDF11 a specific exercise in Zambia for developing sector and crosscutting papers which was organized by the EU was cited by various donors and by government stakeholders as having been useful in identifying gaps (with education emerging as a (potential) donor 'orphan'), and highlighting areas that might be oversubscribed (e.g. governance). Joint programming in Zambia was also reported to have resulted in good synergies with other donors in the nutrition sector when the EU came in and supported DFID, Sida and Irish Aid's work on the Scaling up Nutrition (SUN) Movement and helped to substantially increase the scope and reach of this initiative in Zambia.

116. There are some indications from the country studies that joint programming may work better among EU member states than with other partners. From interview evidence in the case study countries this is explained by the existence of shared priorities and values among specific MSs. Some interviews suggest that the EU adds value by encouraging DPs to sit together more and share information, but that this is not always done sufficiently beyond the planning stage and that programming is not always followed by joint monitoring and evaluation mechanisms to assess progress toward common goals and results and lesson-learning. Country studies suggest that there may be a need for more frequent communication of on-going implementation to ensure that programmes are better coordinated in practice (not just at the programming stage) (Zambia, Cameroon) and to provide continued visibility for the work of the EU.

117. The evaluation finds that the EDF has focused on strengthening joint programming under the EDF11. Challenges to more effective programming are both internal and external, and mechanisms by which complementarity might be achieved are not sufficiently in evidence.

*JC 5.3 Extent to which the EDF interventions at country, territorial, regional and intra-ACP levels have benefited from the EU's Policy Coherence for Development Principle*

118. This JC identifies examples where EU policies might negatively affect, or be in contradiction with, EU development objectives at the different levels of the EDF.

119. Through Policy Coherence for Development (PCD), the EU seeks to ensure that all policies that are likely to affect developing countries take account of development priorities and increase the effectiveness of development cooperation. This should minimize contradictions and build synergies between different EU policies.

120. Previous evaluations found that PCD does not feature prominently in Commission evaluations. Thematic and country evaluations reviewed by this evaluation shed very little light on PCD, showing limited attention to this issue in the previous EDF phase (OECD, 2012; DFID, 2011) (see Annex 20, Part F).

121. The EU has put in place procedures and instruments to achieve its PCD objectives. The Better Regulation Guidelines (EC, 2015a) include a specific tool for analysing the potential impact of important EU policy initiatives on developing countries to ensure that these are taken into account at a very early stage in the preparation of an initiative. The EDF11 also introduced a "Steering Committee Review" to have major projects checked for PCD alignment, involving a management-level analysis of the "project idea" before the projects move to the identification phase and QSG1. Monitoring through bi-annual reports by the Commission on PCD has been in place since 2007 (the latest report dates from 2015). Concord (the European NGO confederation for relief and development) also produced two reports on PCD in 2015 (Concord, 2015e and Concord, 2015b) which have highlighted some of the challenges, in particular in terms of poor effectiveness of feedback on PCD, and which conclude that development remains insufficiently considered when other policies are put in place, and that CSOs are not being seriously involved in PCD. There is also a specific PCD team in DEVCO which is charged with promoting PCD and coordinates internal work across services (thematic units, other DGs, EEAS and EU Delegations) and with other institutions (Council and European Parliament). PCD reporting has been integrated into the EAMR reporting

since 2014 (EC, 2015d). The Commission has used this reporting to begin to develop a targeted training tool on PCD based on e-learning and on-site sessions to further raise knowledge and awareness in Delegations.

122. For the country level a specific analysis of the EAMRs for references to PCD (see Annex 20, Part F) and the country studies shows that PCD is a current issue (15 out of 25 EAMRs include information on PCDs). Three countries provide examples where policy coherence has benefited development agendas (Kenya, Uganda and Dominican Republic). Seven countries cite examples of policy incoherence, mostly related to economic/trade issues clashing with other priorities around job creation, economic growth, and universal health care. However, in most cases the reporting focuses on listing various instances of engagement in dialogue across different policy areas (for example on climate change, private sector, food security, maritime security) but does not demonstrate how policy coherence is being sought. EAMR reports also mention PCD when this concerns incoherence between the policies/actions of the partner government and EU policies (for example, the PC government privileging trade partners from Asia).

123. The evaluation finds that PCD principles are reflected in regional and intra-ACP cooperation, for instance through support to the nexus of security development and strengthening coherence with aid and trade policies, as peace and security and regional trade and integration are amongst the pillars for regional and intra-ACP cooperation in the EDF11 (see Annex 7).

124. Finally to note that the evaluation found evidence of recent tensions between foreign policy priorities and cooperation priorities as illustrated by the case from Ethiopia (see Box 9).

**Box 9. Migration at the crossroads of EU Foreign and Security Policy and its Development Cooperation Policy: the example of Ethiopia**

Ethiopia is an example of using different instruments in complementarity towards the same objective, including political dialogue, policy dialogue and funding, whilst maintaining close synergies with other initiatives affecting the same population groups (resilience, food security, humanitarian aid) (Annex 16).

Well before the eruption of the Syrian crisis and the ensuing EU security and migration initiatives, the EU supported migration in Ethiopia because of the country's pivotal role as the main host for migrants and refugees within the Horn of Africa. Support included African Union-managed support to security through the African Peace Facility (EDF-funded) and to migration through the Pan-African Programme, but also two important bilateral migration projects (funded by DCI-MIGR and DCI-HUM), complemented by two EDF11 projects in 2014. From 2015 onwards, attention to migration increased further, with the EU/Ethiopia signing of the Common Agenda on Migration and Mobility in November 2015 and the approval of a series of migration projects funded through the EU TF: over 2012-2018 just over €300m will have been allocated to support Ethiopia's migration. Migration is also one of the six issues of common interest for political cooperation with the EU defined in the EU-Ethiopia Strategic Engagement signed in June 2016 (discussions had not yet started at end 2016).

In Ethiopia, the EU thus capitalised on both its political dialogue on migration and the use of the diversity of instruments available to maximise support to the sector over 2010-2016. It also took advantage of the new TF by successfully leveraging funding for migration from the TF through an initial transfer of some NIP funds.

## 2.6 EQ6: To what extent has the EDF leveraged further funds and/or political or policy engagement?

### *Summary response to evaluation question*

The EDF has the tools to leverage additional funds for development and incentivise political and policy dialogue. In practice, the EDF does not always manage to have a successful leverage effect.

There is evidence that the EDF support to DRM has contributed to the creation of structures and incentives for increasing DRM. The EDF's contribution is likely to increase in the future through increased funding for DRM.

Blending facilities do not necessarily mobilise additional finance. Existing evidence shows that this is the case in approximately 50% of the cases. There are also some concerns that blending is not adequate in all country contexts and could restrict the ability of the EDF to fulfill the principles of ownership and partnership; ensure EU's visibility; and advocate for EU values.

The legal basis of the Cotonou Agreement (Article 8) provides a valuable entry point for political and policy dialogue at country level, while the EDF's volume of funding and the role of the EU in bringing together EU MSs act as incentives. Policy and political dialogue is sensitive to external factors.

### *JC 6.1 The extent to which the 10th and 11th EDF have successfully contributed to the increase of domestic resource mobilisation*

125. This JC explores EDF11's support to DRM and assesses whether it has resulted in any increases in ACP countries.

126. There is evidence that the EDF10 has supported and contributed to increasing DRM in some countries, but not in a consistent manner across all ACP countries. The EDF has been associated with increases in tax revenues in Burundi, Mali, Mozambique, Tanzania and Zambia (Fiscus, 2014, Lawson et al, 2011, SEE, 2014). The EDF has also actively supported tax reforms in Burundi, Guinea-Bissau, Mali, Mozambique, Sierra Leone and Tanzania (ibid, EC, 2012b). In most cases, the progress has been linked to the use of BS and other support provided in the context of PFM. In general, PFM efforts during the EDF10 focused on the expenditure side of public finances, rather than on revenue collection (EC, 2012b).

127. The analysis of macroeconomic data suggests an increase in DRM across all EDF regions (see Annex 21), but there is limited evidence of a causal link between the EDF and DRM. Some of the evaluations mentioned above suggest that there are different mechanisms through which the EDF can influence DRM: i) systematic support to PFM reforms in countries that benefit from BS and the related policy dialogue (e.g. Madagascar, EC, 2016h); ii) direct support in the form of technical assistance (e.g. in Burundi); and iii) the use of tax revenues as a disbursement indicator in performance assessment frameworks (e.g. Mali). Additionally, there is evidence of DRM being raised as part of the political dialogue in some countries (e.g. Madagascar, EC, 2016h).

128. Support for DRM is likely to increase under the EDF11. Based on the evidence discussed above, this is likely to contribute to increase DRM in ACP countries. The BS Guidelines approved in 2012 require BS contracts to consider DRM in their assessment and performance frameworks, as well as political dialogue and capacity development efforts (EC, 2012d). The guidelines emphasize the three mechanisms mentioned above (PFM support and political dialogue, technical assistance and tax revenues in performance frameworks) and should contribute to expanding their use across ACP countries.

129. EDF support to DRM is also likely to increase under the EDF11 compared to the EDF10, through other indirect means of support at different levels. The 2011 Communication on Tax and Development (EC, 2010b) put DRM at the centre of the EU development agenda, but the definitive impulse comes from the Addis Ababa Conference on Finance for Development, the SDGs and the political impact of tax scandals that have affected Europe (e.g. Luxleaks). The EU's strategy has been articulated in the document "Collect More – Spend Better" (EC, 2015u). Unfortunately, it is not possible to track expenditure on DRM accurately in the existing databases to make a comparison

between EDF10 and EDF11. But for example, by signing the Addis Tax Initiative, the EU has committed to double support for DRM in developing countries (EC, 2016i). The introduction of a new DAC sector code for DRM in July 2016 should help to bridge this information gap in the future.

130. DEVCO’s support to DRM is structured at different levels, although the specific contribution of the EDF is not always clear. DEVCO contributes to global and regional initiatives such as the OECD’s Action Plan on Base Erosion and Profit Shifting, the Extractive Industries Transparency Initiative (EITI), the Addis Tax Initiative, the African Tax Administration Forum and Regional Technical Assistance Centres (RTACs). There is evidence that the EDF has been used to support some of these initiatives (EC, 2012b, EC, 2016d). DEVCO has also contributed to the development of tax assessment tools such as the Tax Administration Diagnostic Assessment Tool (TADAT) to cover the specific gaps not addressed by the Public Expenditure and Financial Accountability (PEFA) methodology. DEVCO has also supported third party initiatives with an impact at country level such as the IMF’s Revenue Mobilisation Trust Fund that provides technical assistance to developing countries (IMF, 2016). It has not been possible to find reliable figures on this, but the EDF11 is expected to contribute to some of these activities as well as the fulfilment of the “Spend More – Collect Better” agenda EC, 2016d).

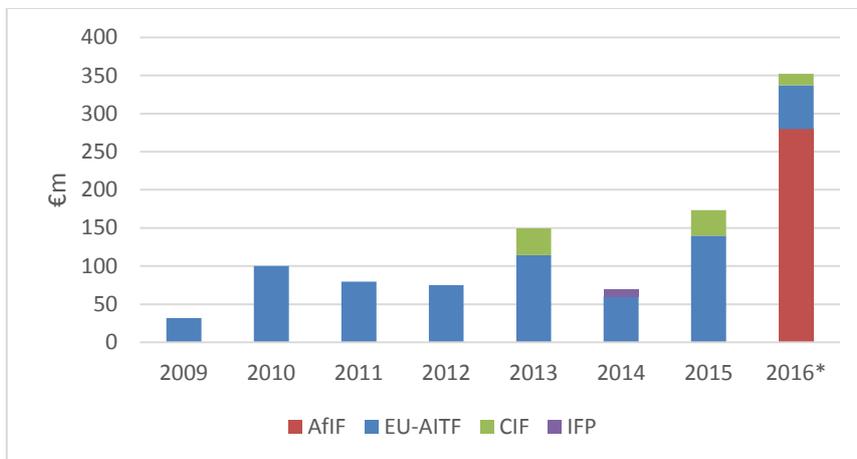
*JC 6.2 The extent to which the EDF has successfully leveraged funds for development*

131. This JC focuses on the blending facilities supported by the EDF. It discusses how these facilities operate, the target regions and sectors, and whether they contribute to leverage additional funds.

132. Blending consists of the use of grants in combination with other forms of finance to support development projects in partner countries. Blending grants can be used in different ways. The simplest forms include paying for technical assistance supporting the project or specific investment costs (e.g. certain equipment). Grants can be used in combination with loans (e.g. to subsidise the interest rate) or to provide an investment guarantee or make equity investments (e.g. a share in a company).

133. EDF funds are used to support four different blending facilities: the EU-Africa Infrastructure Trust Fund (EU-AITF); the Africa Investment Facility (AfIF), which will replace the EU-AITF; the Caribbean Investment Facility (CIF); and the Investment Facility for the Pacific (IFP). Both the CIF and the IFP are exclusively funded by the EDF. The EU-AITF was predominantly funded by the EDF (€647.7m) with a further €164.3m from member states. The AfIF is being financed through the EDF and the DCI Pan-African programme. However, most of the funding is expected to come from the EDF.<sup>63</sup> The aggregate amount of grants for blending projects provided by these four facilities has increased significantly in the last couple of years (see Figure 7). The lion’s share of these funds is attributable to the EU-AITF and, starting 2016, to the AfIF.

**Figure 7 Grants from the EU blending facilities supported by the EDF (€m)**



Source: based on the analysis of DEVCO’s database on blending projects \*Partial data for 2016

134. Blending facilities supported by the EDF focus predominantly on the energy and transport sectors, mainly as a result of the decision to predominantly target these sectors under the EU-AITF. Out of the 160 projects recorded by DEVCO since the launch of the first blending facility in 2007 until October 2016 (total blending grants of €1.1bn), 95 target the energy sector (€616m), 44 the transport sector (€394m), 9 the water and sanitation sector (€74m), 8 the ICT sector (€36m) and 4 are multi-sectoral (€9m). While this distribution remains the same for the EU-AITF, the CIF and IFP have a slightly different distribution of sectors due to the smaller number of projects (Figure A.47 and Figure A.48 in Annex 13).

135. The real leverage effect of the four blending facilities supported by the EDF is difficult to evaluate. The European Commission uses three different types of ratios to measure the leverage effect and the value is recorded by DG DEVCO (see Annex 21). A leverage ratio essentially compares the amount of EDF grants with some other volume of money linked to the projects (e.g. total projects costs). For example, an investment leverage ratio of 10 or 1:10 means that for every €1 of EDF grants dedicated to the projects, a total of €10 has been invested in the project. Leverage ratios are thus arithmetic ratios, with no implication for causality (ADE, 2016).

136. Without additional information, leverage ratios tell us very little about the actual capacity of the blending facilities to leverage other forms of finance. For example, the use of the “investment leverage ratio” (see definition in Annex 21) assumes that the grants from the blending facilities have leveraged all other forms of finance (i.e. that without the grant the project would not have happened). However, there is limited information that this is the case. A report from the European Court of Auditors (ECA) looking at the performance of the regional blending facilities (ECA, 2014a) suggests that the European Commission does not always perform a clear analysis to show the grant was necessary for the project. This problem affects approximately half of the projects evaluated. In the report, figures are discussed aggregately for all regional blending facilities supported and there is no information on the specific performance of those supported by the EDF. A number of corrective measures and improved project assessments forms were introduced to tackle the problems identified in the ECA report (ADE, 2016). An independent evaluation looking at all blending facilities has shown that blending helped to mobilise additional finance in half of the projects evaluated (ADE, 2016). The evaluation also found evidence that blending can also have a leverage effect that is not purely financial. Only 44% of the projects in the sample belong to blending facilities funded by the EDF and the exact leverage effect of the blending projects supported by the EDF could therefore be different.

137. Moreover, one may think that higher leverage ratios are better, but in the absence of other information that confirms that leverage has actually taken place, a high leverage ratio only indicates that the funding from the blending facility is more diluted (compared to a project with a lower leverage ratio). The smaller the contribution of the blending facility to a project the less instrumental it is likely to be (e.g. contributing €1m to a €100m project is not the same as contributing €30m). In addition, there is still uncertainty about the presence or absence of a displacement effect in the case of blended finance. Even when there is evidence that indeed leverage has taken place (i.e. the money put in from the EDF has attracted funding from other sources for that particular project), there still is no evidence that funding from other sources would be additional to the total aid received by PCs rather than just a displacement from one policy area or project to a blending project subsidised by the EDF.

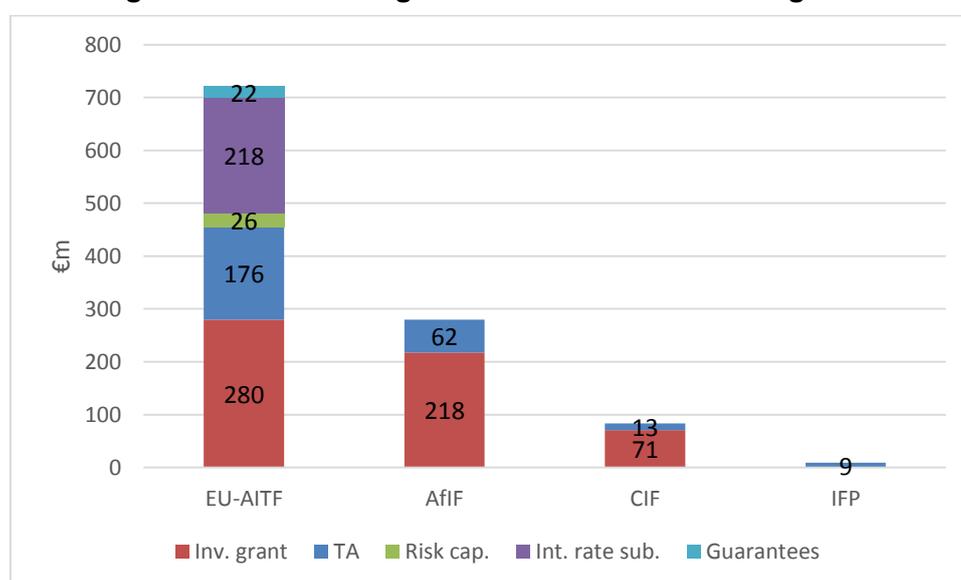
138. Leverage ratios that try to measure the involvement of the private sector (the case of the “private loans/equity ratio”, see Annex 21) are affected by additional problems. Firstly, the private sector does not necessarily need to be a partner in all blending projects. In this regard, this leverage ratio might only make sense in projects where private investments are desirable or actively sought. Secondly, according to DEVCO, the figures on private investments recorded in the database are approximate and do not reflect the real private investment going into this project. The Commission is currently working on a consistent way to measure the involvement of the private sector.

139. Although blending facilities can use grants in different ways, in practice most of the money is used to provide investment grants (e.g. infrastructure works) and technical assistance (see Figure 8 below). Other uses of the grant element have so far been restricted to the EU-AITF (e.g. interest rate subsidies) and remain marginal. According to DG DEVCO, this is explained by the greater

ability of investment grants and technical assistance to increase the development impact of blending projects (e.g. by funding specific areas of the project targeting rural or vulnerable populations). In addition, due to the lack of evidence, it has not been possible to confirm whether the financial instruments pillar assessment might have also played a role in observed distribution. EC regulations require additional and complex assessments of financial institutions leading projects where grants are awarded in combination with a financial instrument (interest rate subsidy, etc.). This requirement does not apply in the case of grants for TA or project investments (EC, 2016f, p. 90).

140. There are also some broader concerns about the use of blended finance. Some of them are related to how blending operates in relation to the principles of the EDF such as ownership and partnership. Blending facilities could represent a departure from some of the guiding principles of the EDF. ACP countries are not represented in the decision-making structures of the blending facilities (ECA, 2014a). Projects are discussed in Brussels by the Commission and financial institutions and decisions are adopted by the Commission and EU Member States (ibid). While this decision-making structure mimics the operation of the EDF committee, it does not provide space for the consultative processes that are required in the EDF (e.g. NAO system, country consultations, etc.) (see also ECDPM, 2016). Individual projects are managed by the leading financial institution and use the institution's systems and procedures, and are thus not required to follow the same consultative processes that the EDF, which is binded by the Cotonou Agreement. The use of indirect management through financial institutions could also reduce the visibility of the EU and limit the possibility of advocating for specific EU principles and values. Other concerns related to blending as a financial instrument revolve mainly around whether blending would use grants to incentivise reimbursable forms of finance (loans) and contribute to increasing debt levels in developing countries (European Parliament, 2014b). In turn this suggests that the instrument might not be adequate for countries with low repayment capacity or a high debt ratio (IMF, 2013, Prizzon & Mustapha, 2014).

**Figure 8 Use of the grant element in the blending facilities.**



Source: based on the analysis of DEVCO's database on blending facilities

*JC 6.3 The extent to which the EDF, because of the legal basis of the Cotonou partnership, has enabled the EU to take on a leading role in policy and political discussion with PCs.*

141. This JC focuses on the contribution of the EDF to three key processes at the partner country level: policy and political dialogue, donor coordination, and the capacity to engage on a discussion on political issues with partner countries (e.g. human rights, gender, democracy). Where possible, this section tries to identify the specific contribution of the EDF to these different processes.

142. It is clear that EUD participation in policy dialogue was already well established during EDF10. There is evidence dating back to the EDF10 that EUDs in ACP countries have actively

participated in political and policy dialogue in partner countries. Fourteen (14) out of the seventeen (17) country evaluations reviewed confirm that EUDs had a role in these processes (see Annex 21). Three (3) evaluations mention that dialogue is restricted due to the political situation. The remaining evaluations do not provide evidence on the subject. The 5 instrument evaluations reviewed during the research (see Annex 21) provide additional evidence in this regard. The analysis of the EAMRs suggests that in 2015 the situation was quite similar, with the EUDs participating in political and policy dialogue processes in nineteen (19) out of the twenty-five (25) countries (see Annex 21). In an additional five (5) countries, policy dialogue is restricted due to the political situation. The information collected during the country missions provides additional supporting evidence. EUDs have actively engaged in political dialogue with the government in Zambia, Ethiopia, Cameroon, Dominican Republic, Burkina Faso and Timor-Leste, although the quality of the dialogue varies from one country to another (MNs 741, 69, 87, 223).

143. There is some evidence that political dialogue has improved in recent years (EC, 2016b), but the lack of other sources of evidence for triangulation and the variability that one can expect at the country level does not make a comparative assessment between the EDF10 and the EDF11 possible. Moreover, there have not been substantial changes to the EDF regulations and procedures between EDF10 and EDF11 that could have a significant impact on the basis of dialogue, although the deployment of the EEAS and the introduction of political advisors in the EUDs might have had an impact.

144. This evaluation has focused on exploring the different elements that can contribute to increasing the quality of the political and policy dialogue at the country level. This requires looking at both levels of dialogue – political and policy – separately, while recognising that they are usually interconnected. Although it has not been explored in this report because it takes place at the project level, it is important to acknowledge the importance of a third level of dialogue. Operational dialogue comprises formal and informal dialogue and collaboration at the programme/project level, and often serves as an important building block for the success of more structured higher level dialogue (policy and political).

145. Policy dialogue is the lower level of dialogue and is usually conducted to inform specific policies (WHO, 2015). As a result, it is generally conducted at a sector level (e.g. energy or agriculture). Donors, in this case the EU, tend to participate in policy dialogue processes in the sectors where they provide support. One specific advantage of the EDF in this area is that, through the use of BS, it has combined a large financial envelope with a framework of policy conditions. This has created the incentives and structure for policy dialogue to take place (Fiscus, 2014, MNs 18, 69, 72, 87, 162, 203, 223, 300, 440). In cases where there has been a transition from BS to project support, policy dialogue has suffered. BS, however, is no guarantee of good policy dialogue and other factors such as a good relationship with the government and the government's commitment to reform also play an important role. At the sectoral level the following elements have been found to contribute to increasing the quality of the dialogue: long-term engagement (MN 74; Box 1 above), a common agenda and good coordination among donors as policy dialogue usually takes place around sector tables bringing together government and donors (MNs 452, 495).

146. Political dialogue takes places at a higher level and covers issues which are not necessarily connected to the EDF activities in the country. In ACP, the legal basis for political dialogue is provided by article 8 of the Cotonou Agreement. The Cotonou Agreement provides a formal and legally binding framework for political dialogue. Evidence collected during the evaluation shows that Article 8 alone is not a sufficient condition to ensure a "meaningful" dialogue with partner countries. Other factors both related and unrelated to the EDF also play an important role (MNs 34, 69, 170, 270, 440, 443, 448, 462, 778; EC, 2016b). Among the former, the volume and "neutrality" of the EDF funding – though this is difficult to disentangle from the role of the EU itself – are often considered to contribute to strengthening dialogue. In some countries NAOs also play an important role in organising and facilitating policy dialogue. Other factors unrelated to the EDF include the existence of common interests (e.g., economic), commitment to reforms, the convening power of the EU (bringing together and coordination of EU MSs) and the personality of key players.

147. Policy and political dialogue at the regional and intra-ACP levels is generally more restricted. At the regional level, the existence of multiple regional organisations with overlapping membership,

particularly in Africa, and the limited capacity of some of these bodies constrains the impact of policy and political dialogue (ECA, 2009a). EDF10 evaluations show that where dialogue has taken place, it has contributed to raising awareness and increasing mutual understanding (EC, 2016b). The regionalisation of support to certain sectors such as road infrastructure has had a negative impact on policy dialogue at country level because it has decreased the involvement of the EUD in the policy dialogue and reduced the momentum of certain policy reforms and put them at risk (see Box 1). There is evidence that the EDF provides opportunities for policy dialogue at the intra-ACP level (global) and that it has helped to develop joint global approaches in certain areas (EC, 2013d).

148. The EU plays a role in donor coordination structures in partner countries. Ten of the DEVCO evaluations contain information on this and they all indicate that the EU is actively involved in donor coordination structures (see Annex 21). In half these cases (five) the evidence shows the leading role of the EU. The analysis of the EAMRs shows that in seventeen of the twenty-five countries reviewed, the EU plays an active role in these structures. In a further five reports, there is evidence of an active role, but also the acknowledgement of important limitations in donor coordination structures at country level. The remaining reports provide weak or no evidence in this area. The country missions reveal that the EU plays an important role in donor coordination in Burkina Faso, Cameroon, Ethiopia, Dominican Republic, Timor Leste and Zambia (MNs 57, 170, 82, 51, 74, 17, 495, 321, 118, 346, 241, 267, 109). In Aruba and New Caledonia there is no real donor community so coordination is not a relevant issue.

149. In cases where the EU has played a leading role in donor coordination structures, the following aspects have played an important role (e.g. ADE, 2014b, ECO Consult, 2012a, Ecorys, 2014, MNs 118, 223, 440, 69). Firstly, the EU often plays the role of convener of EU MSs and this role is generally perceived as legitimated by MSs. In addition, the EU push for division of labour and joint programming has incentivised EUDs to start a dialogue with MSs and map out their work in different areas. This is the case even in countries where joint programming has not actually prospered. A number of other factors have been found to have a negative impact on the EU role in donor coordination, including the lack of good coordination structures and government commitment to them and capacity constraints (staffing) on the EUD side (Lattanzio, 2015, ADE, 2014a, Ecorys, 2014, ECO Consult, 2012a, MNs 17 and 462).

150. Evidence that the EDF has enabled political issues such as human rights and democracy to be raised with PCs is somewhat more limited than in the previous two cases, but clearly positive both for EDF10 and EDF11. Eight (8) of the independent evaluations conducted for DEVCO provide information on this (see Annex 21). Out of these eight evaluations, six (6) provide positive evidence. The remaining two (2) conclude that the political situation has imposed serious limitation on the ability of the delegation to discuss these issues with the government. The analysis of the EAMRs for 2015 indicates that in twelve (12) out of the twenty-five (25) countries reviewed, sensitive political issues are discussed with the government. The remaining documents in the sample provide no or little evidence. The country missions conducted during this evaluation confirm this finding. Sensitive issues are part of the dialogue with government authorities in Zambia, Cameroon Burkina Faso, Dominican Republic and Timor-Leste (MNs 170, 203, 257, 365, 395, 477, 486, 498, 741). In practice, the existence of dialogue does not mean that all kinds of issues are discussed with the government. For example, in some countries the government is not willing to discuss the issue of LGTB rights. In Aruba and New Caledonia, dialogue on these issues is not as relevant due to their special nature. The ability to raise political issues with partner countries depends to a significant extent on the existence of a good political dialogue with the national authorities. This provides the space and the trust to discuss the issues openly. Another factor that seems to play a role is the existence of EDF projects and programmes in the areas of interest (MNs 203, 395, 486, 498, 440), perhaps because this helps to combine political and policy dialogue while providing an incentive to engage (grants).

### 3. Conclusions and Recommendations

#### 3.1 Overall assessment

151. This performance review focuses on the EDF11 as an instrument and brings together considerations and findings around: a) the fit and interaction of the EDF with EU priorities and other EFIs and the extent to which the EDF fits the EU's political and development agenda; b) the founding principles of the EDF and to what extent the EDF pursues the right objectives in a changing context; c) how the EDF has been structured and organised to achieve these objectives; and, d) the tools that the EDF has at its disposal to achieve its objectives.

152. How does the instrument fit with the EU's agenda and with the other EU instruments? The performance review finds that as an instrument the EDF has remained highly relevant as its guiding principles largely foreshadowed those emerging from the international forums in 2016. In relation to the EU's political agenda, EQ1 has shown there is a tension between what the EDF was designed to do and what it is expected to do today. Addressing new agendas by using EDF funds in new ways, such as through trust funds or blending facilities, has implications for the EDF's core principles, which if weakened undermine the strengths of the instrument (see EQ1 and EQ6).

153. The EDF performance review finds that the EDF stands out among the EFIs, DPs and MSs with a combination of different characteristics that give it an added value when compared to other instruments and other development actors. It is the combination of size, geographical scope, the medium-term horizon and predictability, partnership, ownership, and the range and weight of financial modalities that makes the EDF unique (EQ4). Overall the EFIs complement areas where the EDF falls short because of its specific characteristics (EQ5). However, different decision and management centres reduce the potential complementarity of the EFIs; insufficient accountability for actions not directly managed by the EUDs produces inefficiencies in the management of the EFIs; both put a burden on the delegations and there are clear areas of overlap with the DCI which need to be addressed (EQ5). The EDF allows for a unique relationship with political dialogue (EQ6), although the instrument is not equipped to allow it to reach its full potential in this respect and results are often context-specific.

154. Does the EDF pursue the right objectives and how does the EDF contribute to achieving them? The EDF's ultimate objective is to reduce poverty, and to do so based on the partnership principles enshrined in the Cotonou Agreement. The EDF has played an important role in poverty reduction. However, EDF11 is under a lot of pressure to deliver on several other EU agendas linked to foreign policy preoccupations (migration, security), with implications for its coherence with key objectives, the principles of partnership and the ownership of the instrument, as well as for the effectiveness and sustainability of interventions (EQ1 and EQ2). The review finds that EDF11 programming responded to 'wide' country needs and priorities but less to country preferences when compared to EDF10 (EQ1). While the concept of partnership should encompass non-state actors such as civil society and the private sector, limitations have been found in terms of making this work (EQ1, EQ4).

155. Does the EDF have the right structure and is it organised as it should be? The EDF is divided into two main target groups: ACP and OCTs. At the same time, the ACP envelope is divided into three major funding windows: intra-ACP, regional and national. While there are historical reasons why ACP countries and OCTs are bundled together, the EDF is challenged to adapt flexibly to the very different needs and nature of these groups of countries, and this ultimately raises questions about the territorial scope of the EDF. Within ACP countries, the different levels at which the EDF operates (intra-ACP, regional, national) provide unique opportunities which have been grasped for example with the African Peace Facility, the support to global priorities in education and health, and dialogue around regional priorities. In principle both EDF regional and intra-ACP support added value, as few other players could intervene at a supranational level. However, overall the EDF struggles to make the most out of this potential added value (EQ4). It also faces challenges in ensuring coordination and maximizing synergies between the different levels (EQ5) although there has been a reduction in duplication at country level and progress in coordination with MSs.

156. At the organisational level, the review finds that the duration of the EDF is considered a valuable feature (EQ1 and EQ4). The NAO structure offers the advantage of bringing the EDF close to government but it also poses problems when it comes to implementing the EDF (EQ2 and EQ3) and is perceived in many countries as blocking rather than smoothing cooperation implementation. Similarly, the approach of the EDF in terms of planning continues to be lengthy and burdensome for stakeholders. Implementation is rather rigid and employs a one-size-fits-all approach that is not suited to certain countries or territories (EQs 1, 3 and 5).

157. Does the EDF have the right tools? The complex structure of the EDF as well as the complex architecture of the EU's development cooperation mean that the EDF involves complex procedures which are burdensome on partners and on PCs (EQs 2 and 3). In terms of modalities, the EDF presents a specific added value due to the relevance of BS (a feature which is much appreciated by MSs and DPs), combined with the different choices of financial and implementation modalities and management modes (EQ4). Efforts have been made under EDF11 to streamline procedures: selected efficiency gains have been achieved, but there has not yet been a radical transformation. For OCTs, in particular, the structures and procedures are a major barrier to efficiency and effectiveness. Overall the instrument faces challenges over staffing, results reporting and monitoring (EQ2) and sustainability of outcomes.

### 3.2 Conclusions

158. Conclusions reflect in more detail the findings summarised above (section 3.1) and are loosely regrouped under the same headings to facilitate their reading.

#### **The fit and interaction of the EDF with EU priorities and other EFIs and the extent to which the EDF matches the EU's political and development agenda**

C 1: EDF is an instrument that has served well, and continues to serve well.
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<i>Based on: EQ1 (JC1.1, JC1.2) and EQ2 (JC2.1)</i>	<i>Leading to recommendations: R 1, R 2</i>
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159. EDF11, like its predecessors, has responded well to the EU's development cooperation objectives by offering support, via a wide array of financing and implementation modalities, to the priority needs of ACP partner countries. The EDF has contributed positively to development results at country level, with results attested to in many countries and sectors; results at intra-ACP level in different fields were also acknowledged but regional level results have been less easily identifiable. Whilst responding to development needs, it has applied, with varying degrees of success, the key principles of aid effectiveness as committed to by the EU in international forums: sector concentration, alignment, harmonisation. It has also, for the first time, put into practice the principles of differentiation and synchronisation, even though the latter has not been taken advantage of in many countries, and differentiation has not been applied to the OCTs. Principles of ownership, management by results and mutual accountability were found to be less consistently applied under the EDF11. Attention to cross-cutting issues was also muted, except for gender mainstreaming in EDF projects.

C 2: EDF has provided a good entry point for promoting EU values.
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<i>Based on: EQ1 (JC1.1), EQ2 (JC2.2), QE4 (JC4.1, JC4.3) and EQ6 (JC6.3)</i>	<i>Leading to recommendations: R 1, R 2</i>
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160. Art.8 of the Cotonou Agreement has opened the door to discussing with partner governments the EU fundamental values of democracy, rule of law and the universality and indivisibility of human rights and fundamental freedoms (as defined in Art.21 of the Treaty on European Union). While recognising that Art.8 dialogue is not enough to guarantee an effective exchange of views, it provides a valuable entry point that can be further enhanced by EDF-related and non-EDF-related factors (e.g. common economic interests).

The following features of the EDF have been found to help promote EU values: the consideration of fundamental values when deciding the allocation of EDF funds to different countries; the increased mainstreaming of these issues in the design of EDF actions in various sectors; the use of BS and the volume of grant funding to open up space for policy and political dialogue to take place. The

EDF also provides direct support to fundamental values through its support to CSOs and to their actions in advocacy. This is an area where the EDF might be less well placed than the DCI's CSO and LA budget line as its actions are subject to agreement with the national authorities. However, even here, having to go through the NAO for project approval can help bring these difficult issues to the table. Nevertheless, it was also found that this unique potential offered by the partnership and Cotonou Agreement has been only partially exploited, as dialogue capacities, mechanisms, and context-specific issues have limited the results of political and policy dialogue.

C 3: The EDF faces strong demands to tackle an increasing number of priorities, sectors and areas, some of which can be difficult to align with the EDF's core values/founding principles of "poverty eradication" and "partnership" with ACP countries. The EDF11 has accommodated some of these new priorities, but there is a real threat that EDF will be pushed into a role of responding to other agendas with different objectives that might be difficult to reconcile with the EDF's core values and compromise what it traditionally has done well.

*Based on: EQ1 (JC1.3 and JC1.4) and EQ5 (JC5.3)*

*Leading to recommendations: R 1, R 2, R 4, R 5*

161. The EDF11 has taken on board many of the objectives, principles and priorities that emerged in 2015-2016 from the 2030 agenda debates: the SDGs, the changes in partnership, the increased attention to new channels of financing, etc. were already to some extent foreshadowed in the EU's Agenda for Change of 2011 and the consequent design of EDF11. These international commitments will take time to be translated into a new cooperation framework but when they have been, they are not expected to fundamentally change the principles and objectives of the EDF.

162. This is not the case when considering the new emerging priorities of the EU linked to EU interests (security and migration): responding to these has resulted in a strong pressure on the EDF as an easily available source of funding for the establishment of trust funds. These pressures have seen the EDF's reserve funding being used up extensively for the EU TF and have not formally integrated the EDF's traditional governance structure based on the principle of partnership even though in practice PCs are involved in decision making. There are also other forms of pressure to expand the EDF's scope such as the use of blending facilities, funded through the EDF's regional envelopes. Both the trust funds and the blending facilities recentralise the decision power in Brussels.

163. The extent to which the objectives of EU concerns in areas such as foreign policy, and the actions that they entail, are converging with the EDF's mainstream business of eradicating poverty and contributing to sustainable and equitable growth seems to have been insufficiently considered. This also raises the question as to whether the EDF should be used to address EU foreign policy concerns and whether putting the EU's interests first is compatible with the EDF's objectives or with the EU's longer-term interests and values.

### **Objectives of the EDF in a changing context and how the EDF contributes to achieving them**

C 4: EDF has provided an anchor in a fast-changing environment: it has enabled, through its longer-term planning horizon, an alignment to national priorities and a coherent and predictable response to development challenges. However, as an instrument it is still rigid and is insufficiently able to respond to changing needs.

*Based on: EQ1 (JC1.1, JC1.2, JC1.3) and EQ5 (JC5.1)*

*Leading to recommendation: R 3*

164. Against a general background of rapidly changing priorities, often diverging agendas of PCs, donors and MSs, and dwindling bilateral resources for development cooperation, the EDF has provided a safe harbour, a continued and reliable partnership.

165. Within a longer-term programming framework, the EDF has, through its regular funding, set structural development challenges above short-term political considerations and has supported sectors and countries in a predictable and consistent manner over time, aligning to their national development plans, and opening the possibility with the EDF11 to also align to the national planning cycle. This long-term view has enabled the EDF, in selected countries, to become an instrument of

choice in supporting sector reforms, often using the BS modality, but otherwise adopting a coherent set of project and technical supports to underpin sector-wide improvements and accompany sector policy dialogues that focus on promoting long-term changes. This role of the EDF is appreciated by partner countries, MSs and DPs, and is considered to have offered unique opportunities for achieving results including in contexts of fragility.

166. However, the flexibility of the EDF is limited and the programming framework focuses on areas of support that are difficult to stray from once agreed in the MIP. The long programming time (2 years), slow maturing of project/programme formulation (1 year), and implementation procedures and financial controls geared towards financial accountability have combined to produce an instrument that (while sound, predictable and reliable) delivers with a considerable time gap, which sometimes jeopardises the relevance of its actions in a fast-changing environment.

167. The EDF11 introduced changes that offered in principle a more open canvas than that of EDF10 as it allowed for different programming cycles, adapting to countries' national cycles and/or, especially in fragile states, more frequent revisions of the programming framework. However, only very limited evidence was found that these possibilities had been pursued. As was the case for the EDF10, countries visited looked towards the upcoming Mid-Term Review as the opportunity to adapt the existing MIPs to the new challenges that had emerged since 2013-14.

C 5: EDF11 has failed to further advance the partnership principle and has not managed to address limitations that prevent it from widening the partnership principle to include non-state actors.	
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Based on: EQ1 (JC1.2, JC1.4), EQ3 (JC3.2), EQ4 (JC 4.3, JC4.4).	Leading to recommendations: R 1, R 3, R 4
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168. EDF11 has failed to advance in the implementation of the partnership principle compared to EDF10. EDF11 has suffered from two main shortcomings. Firstly, and seemingly more so than in the past, notwithstanding a relatively broad consultation process, programming has mostly been a top-down exercise where EU HQ has tended to impose its priorities (in energy in particular) rather than adapting to those of PCs. The fact that the EDF11 also applied, at the same time, the concentration principle has meant that many PCs felt reduced ownership of programming choices.

169. Secondly, as described in C 3, the push to increase the use of simplified procedures is characterized by 'light' project vetting processes, decreased partnership and programme ownership, and potential implications for programme effectiveness.

170. More generally, the partnership principle continues to face the well-known constraints of NAOs that are too weak or too strong and of fragile CSOs. Despite years of support to both NAO structures and CSOs, evaluations still point out the institutional and operational weaknesses of these institutions but the analysis often remains one-dimensional, forgetting to analyse both sides of the dynamic relationship between the EUDs and the NAO. Evidence points towards difficulties with the functioning of NAOs in some countries when the centralising role of the NAO impedes direct EU relationships with line ministries, local authorities and civil society and jeopardises their ownership of EDF programmes, especially where BS is concerned. Similarly, where donors (and public finance reforms) push for results-based management, NAO structures can be perceived as counter-productive, and a source of inefficiencies and frustrations. However, in other countries, NAO structures work well with the EUDs, facilitating their dialogue with line ministries and easing the environment for CSOs.

171. Relationships with CSOs are usually very good and improving but are limited to selected civil society representatives (usually those that happen to work on EU-funded projects). Also, whilst EDF11 opened the door to an increased participation of the private sector and civil society in programming (with the exception of regional and intra-ACP cooperation), consultations were mostly found to be shallow and often perfunctory. Very limited evidence was found that representatives of the private sector, religious leaders, cooperatives, or political parties were consulted. EDF11 is failing to strengthen the democratic participation of its cooperation, as subscribed to in the CPA, particularly as civil society is still mainly perceived as a target of cooperation and not as a key partner in decision-making, not adequately associated with the political and policy level dialogue, supporting reforms, governance oversight and strengthening of democratic values and governance.

In general, despite the EDF and the DCI's CSO and LA budget line and despite the advances made in establishing CSO roadmaps and approaching CSOs in a more structured manner, the EU still has difficulties in finding the right entry points to work with CSOs and with LAs. The direct relationship with CSOs has also suffered because of working through third parties and choosing to increase grant sizes (see C 9).

### **EDF structure and organisation to achieve its objectives**

C 6: EDF11 brought an increased attention to complementarities in planning, and project design processes are likely to limit duplication and increase coordination across instruments and cooperation mechanisms. However, complementarity of EU actions remains challenging particularly for centrally managed budget lines.

Although programming involves complementary sector choices between national and regional cooperation, the EDF has not been able to consistently establish solid synergies across national, regional and intra-ACP cooperation.

*Based on: EQ1 (JC1.1), EQ5 (JC5.1, JC5.2)*

*Leading to recommendations: R 2, R 3, R 5*

172. EU processes and procedures have been reinforced in EDF11 to ensure complementarity between EFIs. Progress is noted over 2014-2015 in reducing duplication of actions between different EFIs, and there are some good examples of complementarity.

173. However, there is still room for improvement particularly in developing stronger complementarity and also in further reducing duplication, among others between the Intra-ACP and the DCI/GPGC. Challenges relate to different decision-making centres for EU instruments (in particular for centrally managed budget lines that tend to operate in a silo culture), insufficient involvement of the EUDs in priority setting, insufficient attention to the monitoring of complementarity, and a lack of accountability at senior management level on complementarity.

174. Although the EDF programming has applied the principle of sector concentration, this has been done in a very loose manner and has only at best had a marginal effect upon the reduction of the EU's aid fragmentation since MSs and DPs still continue intervening in many different sectors. Select further progress has been made on joint programming, but HQ priorities on both the EU and the MS/DP side have contributed to a proliferation of priorities which run counter to the sector concentration principles.

C 7: The EDF has a unique and acknowledged added value that goes beyond its unmatched size, use of different aid modalities (amongst which BS) and geographical spread. It promotes EU values, tackles issues at supra-national level, is neutral and reliable. However, it has not made the most of its potential position in the aid landscape and has tended to use a one-size-fits-all approach that has not sufficiently taken account of the specificities of some of its partner countries and territories.

*Based on: EQ1 (JC1.2, JC1.4), EQ3 (JC3.2), EQ4 (JC4.2, JC4.3, JC4.4).*

*Leading to recommendations: R 4*

175. The EDF is by far the largest instrument of development cooperation in the EU and, added to the other instruments used in the same region, the EU offers probably the largest cooperation portfolio in the world. The EDF has been unwavering in promoting EU values and poverty reduction and sustainable and equitable growth for over 50 years, as well as integration into the world economy at national level, across 79 ACP countries, at OCT level, across 25 OCTs, at regional level and at intra-ACP level. The EDF is based on agreement and dialogue, supported by a strong institutional set-up (NAO, EUDs backed by HQ) and complemented by other Instruments addressing short-term needs. The EDF is unique in combining these aspects with others such as its continuity and predictability of presence and funding, its rich mix of management and aid modalities, its partnership with institutional actors and civil society and last but not least, its strong political ties with the ACPs, embodied in the Cotonou Agreement and in particular in its Title 3, Articles 8, 9 and 10.

176. However, the strategic potential of these unique features has not been fully realized:

- While EU staff are the only systematically and continuously present donor staff on the ground, their expertise is used for financial and administrative purposes more than for analysis of – and dialogue about – development issues. They are also not always posted according to their expertise and experience.
- The partnership has been built giving a special role to the NAO but this role has become that of an administrator and has often blocked the potential for higher level, strategic, dialogue on development challenges and choices between the EU and the partner country.
- Opportunities for political dialogue at the highest level are not exploited to the full, in terms both of promoting EU values and of resolving developmental stalemates.
- Considering its special relationship with PCs and the importance of its financial support, the EU could, in many instances and within the boundaries of ownership and national sovereignty, play a larger role in influencing domestic policies and advocating for EU values. Again, this is not done or is only attempted in a limited manner when providing BS.
- The EDF has tended to approach its large constituency of countries with an approach that has been too standardized (e.g. using BS as the instrument of choice for OCTs, and reducing staffing regardless of specific needs of specific countries and regions) has hampered its effectiveness, in particular in OCTs, which have specificities which require a more tailored approach.
- Regional and intra-ACP value added have been exploited to a very limited extent as evidenced by poor performance and limited results of regional cooperation. The intra-ACP value added has been considerably eroded by the new institutional set-up.

**Tools that the EDF has at its disposal to achieve its objectives**

C 8: Limited results orientation, lack of measurable indicators and inadequate monitoring and evaluation are seriously constraining the EDF’s ability to report on effectiveness, and hence its accountability and lesson learning capacities.

*Based on: EQ2 (JC2.1, JC2.2, JC2.3)*

*Leading to recommendations: R 1, R 2*

177. The EDF10 scored poorly on the focus on results, in particular, the lack of measurability of interventions and inadequate attention at strategic and outcome levels and the accompanying weakness of monitoring functions (reflecting limited capacities in these areas). In addition, evaluation arrangements are at times very limited, particularly for regional and intra-ACP cooperation. This has undermined the EU’s capacity to demonstrate effectiveness of EDF support and to ensure sustainability of achievements.

178. Two major steps have been undertaken to address this shortcoming under EDF11. Firstly, the EU set up a results framework, based on project results from all countries. However, these remain largely at input/output level (even in sectors such as education and health where outcome indicators are routinely used and available). So far, the introduction of the framework has fallen short of making decisive inroads into changing the EU portfolio management culture towards a more results-oriented and effectiveness-oriented aid management. Secondly, EDF11 procedures provided a renewed focus on results and measurability of expected changes, requiring baseline and target values for logical frameworks. However, the lack of results orientation, limited capacities and inadequate design practices hinder the enforcement of measurability at all levels.

179. Lesson learning tends to be limited and slow: the lack of information on outcomes, combined with the lack of a repository for the acquired institutional memory about lessons learned, means it is difficult to adopt an evidence-based approach to EDF implementation and decision making. In the long term, this decreases the likelihood of achieving good sustainability and impact.

C 9: Efficiency measures under EDF11 have produced some changes that are likely to alleviate the administrative burden and strengthen the instrument's financial performance. These changes have had implications for support to CSOs and have seen the EDF becoming increasingly a cooperation administrator and less a hands-on player, more removed from direct dialogue, decision-making, and priority-setting, with implications for effectiveness of cooperation, including dialogue, effects on governance, sector leadership, quality assurance, accountability and visibility.

Based on: EQ3 (JC3.1 and JC3.2).

Leading to recommendations: **R 4**

180. Efficiency challenges mostly related to cumbersome EDF processes and procedures and management costs of having different processes and procedures for different instruments.

181. Since 2012, the Commission has gradually introduced changes that have lightened and simplified procedures and brought the regulations of different EFIs together; it also introduced changes in staffing allocations intended to make aid more efficient and effective. Efforts are being made to increase the efficiency of EDF11 compared to EDF10. While EDF systems and procedures remain rather heavy and cumbersome, progress has been made in programming, implementation at regional level, contracting and the project cycle. At field level, the benefits of these changes have not yet been felt, partly because they take time to be put into place and become standard practice, because of concomitant time-consuming and frequent updates in procedures and instructions, and because staff reductions have been enforced concomitantly, thus increasing individual workloads.

182. EDF11 has seen EUDs being less involved in the direct management of programmes funded by EDF. Pooled funding was already being used under EDF10. In EDF11, special attention is paid to increasing blending. With the use of the EU TF, delegated cooperation has become the modality of choice. The use of these modalities intends to relieve management pressure on EUDs whilst leveraging funding and expertise from other DPs, and primarily MSs. Whilst very different in their operation, these three implementation modalities have similar characteristics and effects:

- (i) the EUDs are less involved in the design and monitoring of operations with the potential consequence that the project-vetting processes will be less stringent than those of the EU;
- (ii) less EUD involvement might decrease the EU's leadership in cooperation efforts, policy engagement and dialogue with national and regional partners;
- (iii) there is risk of diminished transparency and accountability in use of funds depending on the capacity of other institutions to report in a comprehensive and timely manner.

183. In short, whilst the EU HQ has more say over these funds, the EUDs and PCs have less say, less visibility over their use (and thus reduced quality assurance and less accountability). There is also a risk of diminished visibility for the EU in the field during their use.

184. There has also been a clear tension in EDF between wanting to be more efficient on the one hand (by increasing the amounts for calls for proposals) and strengthening the capacities of CSOs on the other, all against a background of shrinking space for CSOs.

185. A further administrative simplification is the dismantling of the intra-ACP unit. This is blunting the capacity of intra-ACP (which performed well at this level under the EDF10), which now lacks in unified management, vision and dialogue. As a result the intra-ACP envelope is now being used mainly as additional funding to thematic budget lines.

### **3.3 Recommendations**

186. A set of recommendations has been developed based on the above findings and conclusions. Actions that could be undertaken by the EC to operationalize the recommendations are also proposed. It should be noted that all recommendations made also apply to the regional and intra-ACP programmes but they deserve special attention as these mechanisms face specific challenges and involve different groups of stakeholders.

**R 1: Restore the spirit of Cotonou’s partnership principle by instituting a democratic ownership of EDF programming, formulation, implementation and monitoring and ensuring that EDF implementation modalities and tools are coherent with the instrument’s core values and principles.**

*Based on: C 1, C 2, C 3, C 5, C 8*

187. The role of the partner countries, territories and regions in the decision-making and implementation of the EDF must be rebalanced to reflect the spirit of the CPA, on which the EDF is based. This will also ensure alignment with the new European Consensus on Development, “Our World, Our Dignity, our Future” (see section 4.2 of EC, 2016n), with the SDGs, and at a more operational level will contribute to improving the sustainability of actions funded by the EDF.

188. To achieve this, the level of participatory partnership needs to be significantly strengthened by actively safeguarding and promoting the involvement of the full range of different relevant stakeholders in programming, formulation, implementation, monitoring and evaluation. This should take place across the range of settings and levels at which the EDF operates. Restoring the spirit of these important agreements must naturally also extend to tools and implementation modalities available within the EDF, such as the EU TF, blending facilities or delegated cooperation, to ensure that their formal governance and decision-making structures and their modus operandi remain coherent with the instrument’s core values and principles. This is particularly important as the effectiveness of these new approaches (in reaching outcomes, in leveraging other forms of finance) remains to be demonstrated in a context of less direct involvement and oversight of the EU.

189. Proposed actions to align practice with the subscribed principles of democratic ownership include: a) reinforce the capacity of EUDs to support comprehensive, transparent and consultative planning processes which should include the full range of stakeholders (Government, as a policy-maker, regulator and provider of public services; local authorities as the main actor for local development; civil society in a strengthened and representative manner; the private sector; religious leaders; trade unionists; representatives of political parties; cooperatives, etc.); b) monitor and report on stakeholder engagement in key phases of programming and across different EDF instruments; c) undertake a (light-weight) stakeholder mapping of all relevant stakeholders at country and regional levels; d) further strengthen CSOs; e) continue advocacy for, and monitoring of, inclusive, multi-stakeholder consultations by Government and regional institutions on public policy issues; f) review the role of the NAO in EDF management; and g) review the institutional framework of regional organisations and the ACP secretariat.

190. Practical steps to protect EDF’s core values and principles (partnership, ownership, effectiveness, results) cover the different levels of the EDF and include: a) increase participation of ACP countries in the governance and decision-making structures of the EU TF and blending facilities; b) strengthen oversight and steering platforms for trust funds and blending to strengthen accountability and measurability; c) maintain the existing project approbation cycle (Action Document, 2 QSGs, one EDF Committee) and extend it to all projects, including those funded through the EU TF; d) implement the recommendations made by ECA, 2014a; e) adopt and implement a common and consistent approach to test whether and to what extent blending grants are having a leverage effect; and f) undertake an external evaluation of the EU TF.

**R 2: Focus efforts on increasing accountability for results and on improving sustainability across all actions funded by the EDF.**

*Based on: C 1, C 2, C 3, C 6, C 8*

191. To increase the effectiveness of the EDF, the Commission should focus its attention on improving the results of its EDF cooperation. This implies being more vigilant about how programmes and projects it is funding contribute to poverty reduction and equitable and sustainable growth, with particular attention to ensuring:

- (i) interventions are guided by a strong theory of change, and sound underlying assumptions in country, regional and intra-ACP programming and in project/programme design,

- (ii) greater attention to the monitoring of outputs and outcomes, including monitoring of the theory of change's pivotal assumptions,
- (iii) strengthening of national statistical systems as part of country support so these can support results-oriented management.

In practice, it is thus proposed that the EC: a) systematically realises a diagnostic of sector statistical systems and ensures support where required for system strengthening, definition of indicators, methods of data collection and treatment; b) undertakes ex-post evaluations in a more systematic manner across all projects and sectors, including for the regional and Intra-ACP levels; c) creates a central repository of results and evaluations that enables an evidence-based approach to project design and implementation and spreads awareness of such tools; d) sets up regular monitoring at project and sector levels with participation of a diverse set of stakeholders; e) develops effective monitoring systems for regional cooperation including measurable baseline and targets for progress toward regional integration and national commitments and engagement toward regional integration; f) monitors the links and synergies between national, regional and intra-ACP results; and g) expands its current centralised monitoring tool / database to include a set of shared outcome and impact indicators for all countries that come from the same statistical source for increased cross-country comparability, and includes monitoring indicators addressing cross-cutting issues.

192. Improving the ownership and partnership (R 1) and increasing the results-orientation of EU programmes as suggested in this recommendation will in itself contribute to improving the sustainability of EU support. Nonetheless, sustainability also requires specific attention. To achieve this the EU needs to ensure that: a) government is delivering on its commitments to sustainability and that, if it is not, appropriate steps are taken to address this through political and policy dialogue as well as through withdrawal of funding if need be; and, b) when support is withdrawn from a sector, for whatever reason, the EU has an exit strategy that entails consolidation and sustainability of the results obtained. These aspects need to be analysed at project design and factored into the project documents so that during project implementation, steps to be taken in case of non-fulfilment of conditions are unequivocal.

<p><b>R 3: Entrust programming choices to field offices based on a political economy analysis, and ensure that programming can be adapted to evolving needs.</b></p>
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<p><i>Based on: C 4, C 5, C 6</i></p>
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193. To ensure ownership, adequacy to needs and to the local country contexts, programming choices should be entrusted to field offices (including when undertaking Joint Programming), should fully reflect the discussions that have been held at field level and assurances should be given that these choices will be fully respected by HQ.

194. To implement this recommendation, a Political Economy Analysis of the PC should be undertaken before launching the programming and updated every 3-4 years or more often if necessary (e.g. in case of changes of government, social/economic/political upheavals). Where possible, this should be done jointly with the MS (especially if Joint Programming is ongoing in the country). Responsibilities within the EC and timing of programming instructions should be clear. An indicative roadmap for programming, including steps and timing of HQ review, should be provided.

195. More flexibility should also be introduced in the EDF instrument to adapt to major changes, without losing the continuity in sector involvement, the coherence of actions and the predictability of support. Flexibility could be introduced by putting in place a flexible indicative three-year rolling programming framed by the Government's medium-term macro-fiscal and expenditure frameworks and within a seven-year EDF financial allocation. Yearly reviews of needs against the continued relevance of directions chosen and funds allocated would enable commitments to be gradually spread out whilst leaving room to address emerging priorities.

196. Although the recommendation would be fully applicable as from the next programming round, it could, where feasible, be introduced at the next MTR on the funds remaining to be committed. In practice, this would require an indicative roadmap for programming to be prepared as a reference to be adapted to each country according to needs.

**R 4: Conduct a structured review of the impact of the various programming, implementation and monitoring changes under the EDF11 and take corrective action where necessary.**

*Based on: C 3, C 5, C 7, C 9*

197. This review has documented the changes that have been implemented in EDF11 with regards to the programming, implementation and monitoring of EDF at national, regional and intra-ACP levels. One of the changes has been the simplification process, the effects of which have not yet been felt among most officials. Even some of the organizational and structural aspects of the EDF have changed, and as documented for some of these changes there are indications of negative effects (that do not seem to have been considered when they were adopted), for example on participation and access to EDF funding by CSOs.

198. To further improve the management of the instrument and to ensure its continued relevance and alignment with its founding principles (R 1), the impact of these key changes need to be systematically assessed and reviewed. This will ensure that where positive effects have been obtained these are followed up by actions to consolidate the changes and that where no or negative effects were identified, reasons are investigated and (remedial) action taken accordingly.

199. In order to ensure the sustainability of the simplification measures it is important to ensure a sufficient level of awareness among EU officials of these measures and to prevent any negative impacts that could jeopardise the efficiency gains or deliver them at a high cost. Specific actions to ensure this would include: a) improve planning, information and coordination of the implementation calendar of the simplification process in order to increase awareness among staff members; b) review the potential impact of the simplification process on key areas such as ownership, accountability or beneficiaries; and c) coordinate the implementation of the “simplification process” to minimize the number of updates and the adjustments needed by EU staff and other stakeholders; review and simplify IT systems and tools to address bugs, and make them more flexible and user-friendly.

**R 5: Improve complementarity and synergies in the programming and project cycle of the EDF with other instruments, and between the different services (EUD, DEVCO and EEAS) by entrusting the management of all projects and programmes in ACP countries to EUDs.**

*Based on: C 3, C 6*

200. The EDF is not sufficiently flexible to accommodate all needs and it is not desirable that it should do so. The current set-up where the EDF is complemented by a set of other EFIs works well, and works much better since EUDs were given responsibility to manage certain DCI budget lines at field level (for example, local calls for proposals prepared and managed by the EUDs for the CSO and LA budget line). However, the continued implementation at national and intra-ACP level of projects and programmes that neither the EUD nor the national authorities have knowledge of is ineffective, inefficient, and even sometimes counter-productive by not being aligned with the agreed priorities and sectors and requiring additional resources to manage. Countries and EUDs should therefore be fully aware of all EU-funded interventions in the country, whether or not from EDF: this would include full transparency on uses of delegated funding. They should also have total clarity about respective roles of EUD, DEVCO, EEAS and others in the different stages of the programming and project cycle.

201. The following practical steps are proposed to strengthen complementarity and synergies: a) EUDs and NAOs to be systematically informed of any actions undertaken in the country, by whichever part of the EU Commission; b) EUDs to be the decision-makers concerning development cooperation matters; and, c) set up new procedures to facilitate the shift of contracting from HQ to EUDs (managers of DCI at HQ may continue to set the directions of projects but choices and contracts are to be entrusted to EUDs in a similar manner as is currently done for the CSO LA budget line).

202. In the case of the OCTs these measures would not apply as the direct dialogue/coordination between OCTs and the OCT unit in Brussels was found to work well and EUDs face significant challenges already in dealing with a large number of small countries and territories.

## Endnotes

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<sup>2</sup> Annexes to this report are contained in a separate volume. Clicking on an annex reference will take the reader to the full name of the annex in the annex list at the end of this report.

<sup>3</sup> For more on the EDF's origins and evolution, see Annex 2. More on regional and intra-ACP dimensions is provided in Annex 7 and the Desk Report (Visser et al., 2016b) provides a comprehensive treatment.

<sup>4</sup> The agreement was signed in Cotonou on 23 June 2000 and revised in Luxembourg on 25 June 2005 and Burkina Faso on 22 June 2010,

<sup>5</sup> See: [http://ec.europa.eu/europeaid/policies/european-development-policy/agenda-change\\_en](http://ec.europa.eu/europeaid/policies/european-development-policy/agenda-change_en)

<sup>6</sup> For example: Gender Equality and Women's Empowerment: Transforming the Lives of Girls and Women through EU External Relations 2016-2020 (2015); A Global Partnership for Poverty Eradication and Sustainable Development after 2015 (2015); and A Decent Life for all: from vision to collective action (2014).

<sup>7</sup> The budgetary principle according to which expenditure and revenue are programmed and authorised for one year at a time.

<sup>8</sup> Full bibliographical references are found in the Bibliography at the end of this document. Clicking on the short reference in the text will take the reader to the full reference.

<sup>9</sup> The EEAS was formally launched on 1 January 2011. It was created by the Treaty of Lisbon which was signed in 2007 and entered into force in late 2009 ([https://eeas.europa.eu/headquarters/headquarters-homepage/3648/creation-eeas\\_en](https://eeas.europa.eu/headquarters/headquarters-homepage/3648/creation-eeas_en), accessed 6 January 2017).

<sup>10</sup> See EDF11 Implementing Regulation, Art. 18, alinea 7.

<sup>11</sup> The evaluation team also prepared a substantial contribution to the cross-EFI assessment of the Common Implementing Regulations: approved on 19th December 2016, it is now incorporated as Annex 9.

<sup>12</sup> Including the EC's Accrual Based Accounting (ABAC) and CRIS (Common RELEX Information System), and the OECD Common Reporting Standard (CRS) project database.

<sup>13</sup> The countries visited included Aruba, Burkina Faso, Cameroon, Dominican Republic, Ethiopia, New Caledonia, Timor Leste, and Zambia.

<sup>14</sup> The guidelines applied to EEAS, Directorate General (DG) DEVCO and European Union Delegations (EUD) for the programming of EDF11 at country, territory, regional and intra-ACP levels. (see EC, 2012c, EC, 2013a, EC, 2013b).

<sup>15</sup> See Council of Europe, 2005, EC, 2011a, EC, 2012c, EC, 2013a, EC, 2013b, Annex 2 and section 2.2 of Annex 10.

<sup>16</sup> See Annex 14 for detailed data on EDF fund allocations to the two priority sectors and for a summary table of the country visit findings.

<sup>17</sup> The guidance with regards to the use of these reserves for unforeseen needs is framed by the Note Ref Ares(2016)292995 of 20 January 2016.

<sup>18</sup> See Annex 16 for a more detailed description of the EU Trust Fund and the issues surrounding its use, in particular in Ethiopia.

<sup>19</sup> These are €1.5 billion from the EDF reserves and the remainder re-allocations from the NIPs and RIPs. These figures have been communicated to the consultants on 24<sup>th</sup> of May 2017 by the EC during a meeting at headquarters with the EU TF managers.

<sup>20</sup> References include EC, 2015q, EC, 2015r, EC, 2015z; EC, 2016f; EC, 2016j; EC, 2016m; EC, 2016r, EC, 2017a; EC, 2017b; Financial regulations of the EU, Art, 187. See also Annex 16.

<sup>21</sup> The simplification of the implementing modalities included: increasing the average contract size, improving the mix of implementation modalities with reduced use of Programme Estimates and calls for proposals, using BS where possible, and using framework contracts for outsourcing work in Delegations. Staffing would be based on current contract portfolios; existing decisions still to be implemented; foreseen geographic, regional and thematic allocations; and existing implementation mix. The country context would include factors such as the size of the country, its situation of fragility, the number of sectors of involvement, and political volatility.

<sup>22</sup> Six out of the 11 thematic EDF10 evaluations attested to the very poor quality of the Commission's monitoring systems (see Annex 17), citing either the absence of relevant indicators at result and impact levels or the lack of monitoring of existing indicators, even when developed specifically by the Commission (the case of country conflict result indicators). The same message applied to regional programme monitoring and intra-ACP cooperation, which were also found lacking in results-orientation (this, according to the evaluator's analysis and interviews held, is still the case for the EDF11 programming, see Annex 7). The Commission's lack of ability to monitor and report on outcomes and impacts of the EDF was also flagged in the review of the French contribution to the EDF (EY, 2014) whilst the review of the Dutch contribution to the EDF (MFA Netherlands, 2013) concurred with that finding and highlighted in particular the EU's deficit in monitoring BS outcomes. However, it should be noted that an ODI report in 2012 (ODI, 2012) found the EDF to be more effective than other EU financial instruments *inter alia* in its contribution to monitoring.

<sup>23</sup> It should be noted that these additional data collection efforts might also represent additional work pressures on the Delegations. Indeed, it was noted in the review of EAMRs that some Delegations are suffering from 'mission fatigue' due to a succession of monitoring and evaluation missions (traditional ROM, results-framework monitoring, mid-term evaluations) and other 'verification' missions (financial and technical audits, final project evaluations), which weigh on Delegations' workloads (as each mission has its own requirements in terms of support, staff availability, data extraction, report reading etc.; see Annex 17).

<sup>24</sup> Meeting Notes (MN) are records of interviews undertaken as part of the evaluation; they were given random numbers, systematically coded, recorded in a template and compiled into an interview compendium which allowed for analysis using a keyword search.

<sup>25</sup> With the exception of the EDF, all other EFIs share the same set of "Common Implementation Rules", REGULATION (EU) No 236/2014.

<sup>26</sup> The detailed explanation and analysis for these figures is provided in Annex 13.

<sup>27</sup> A number of 1 indicates that on average one other EFI is active in the same sector as EDF.

<sup>28</sup> For example in Zambia the EDF moved away from health and education where other donors (DFID, Ireland and USAID) were also working.

<sup>29</sup> The OPC responses also noted a particular role and added value for the EDF in supporting fragile settings.

<sup>30</sup> By the end of 2015 the DEVCO Unit responsible for intra-ACP cooperation was dismantled and its functions were reassigned across different directorates, to thematic units. Responsibilities for institutional coordination and linkages with the ACP Secretariat were assigned to Unit D3.

<sup>31</sup> These global evaluations are considered to be among the more critical sources of information on the comparative advantage of the EDF as they have examined the EDF as a whole, unlike thematic or country evaluations, which look at particular topics and geographical settings.

<sup>32</sup> The findings on expertise are less positive here than under EQs 2 and 3. This reflects the fact that the evaluation – for this specific evaluation question – sought to establish whether the EDF is (perceived as) offering more (i.e. stronger expertise) than others can provide. EQs 2 and 3 looked at expertise from the perspective of the extent to which the instrument has the required expertise to implement the programmes in the areas in which it operates.

<sup>33</sup> The exception is the Cotonou evaluation (EC, 2016b) which lists "recognised political and technical experience" of the EDF among six comparative advantages (see Annex 19, Part B).

<sup>34</sup> 36% of the 39 EUDs who responded to the CIR Survey and were using the EDF instrument consider that the EDF has an added value in terms of particular expertise. It should be noted that expertise is not a particularly strong area of added value for other EFIs either, except for the EIDHR (with 58% for EIDHR democracy and 54% for EIDHR Human Rights) (Annex 19, Part C).

<sup>35</sup> It should be noted that the very general nature of the EDF would likely make it more difficult to have an added value in terms of expertise that would be evident and demonstrable across the whole instrument, as compared to the more specific nature of some of the other EFIs.

<sup>36</sup> Annex 19, Part B provides an overview of the main areas of added value cited in 30 interviews (some interviews covering groups of people) across a range of stakeholders who had provided detailed reflections on the added value of the EDF.

<sup>37</sup> The use of GBS and SBS modalities has been a specific priority for the 11<sup>th</sup> EDF. It is clearly easier for the EDF to engage in BS than some of the other EU instruments that have a much shorter duration.

<sup>38</sup> A notable exception to this is the regional programme in the Pacific which evidence from the country visit and the recent evaluation suggests has been considerably more successful than cooperation in other regions.

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<sup>39</sup> In Lesotho, there are plans for a varied approach of aid modalities, including twinning TA, intra-regional cooperation, and exchange of best practices

<sup>40</sup> The NIPs were examined for particular attention to issues of ownership (as a key underlying principle of the Cotonou agreement), and to evidence of EU values such as human rights.

<sup>41</sup> Article 21 of the Treaty on European Union defines democracy, rule of law and the universality and indivisibility of human rights and fundamental freedoms as guiding principles of the EU's action on the international scene.

<sup>42</sup> Only three NIPs either do not mention fundamental values at all, or do so only very superficially.

<sup>43</sup> See EC, 2013f. The results of the allocation formula were changed upwards for Benin (+10%, justified partially by its fairly good record on governance) and downwards for the Gambia (-25%, justified *inter alia* by the Human Rights situation being of great concern) and Guinea-Bissau (-25%, being justified by the fact that the country is under Art.96 measures).

<sup>44</sup> This allows the tracking of projects targeting this area either as the "main objective" or as a "significant objective". Further details in Annex 9.

<sup>45</sup> The 2011 evaluation of the EU's contribution to human rights and fundamental values (Petrucci et al., 2011) found that in many countries the EU has made valuable contributions to promoting human rights through the creative use of instruments and the actions of highly committed staff, with variations by country. Success reflected ad hoc solutions rather than a structured strategy. In most countries working on human rights remained very difficult, in particular in addressing civil, political rights and fundamental freedoms. Nevertheless, the evaluation concluded that the EU has had a good track record in reinforcing the support to "non-sensitive" human rights, using a mix of thematic and geographical tools to remain engaged in difficult environments.

<sup>46</sup> EC, 2016b, MN335, MN500, MN74, MN204, MN402, MN444, MN167, Box 2 above.

<sup>47</sup> Sources: MN495, MN300, MN17, MN372, MN118.

<sup>48</sup> E.g. support to the Global Fund for Aids Tuberculosis and Malaria (GFATM) and the Global Partnership for Education (GPE).

<sup>49</sup> Challenges for the cooperation in the Caribbean and Pacific region are also very specific because of geographical distances, the costs involved in moving through the region, and the small size of the administrations.

<sup>50</sup> Different speeds of implementation were evident in a number of the countries visited (e.g. Cameroon, Zambia and as reported in the CIR survey, see Annex 12), and were also noted in the Cotonou evaluation (EC, 2016b).

<sup>51</sup> Ref: COUNCIL REGULATION (EU) 2015/322 of 2 March 2015 on the implementation of the 11<sup>th</sup> European Development Fund.

<sup>52</sup> For the purpose of this analysis we defined sequential complementarity as relating to whether some instruments are designed to provide a quicker response than others and to support different stages.

<sup>53</sup> This decision-making process predates the EDF11 and is applied to all instruments. It includes key steps of identification, QSG1, QSG2, Inter-Service Commission (ISC), and EDF Committee approval with various feedback loops.

<sup>54</sup> This is done through a series of annual thematic budget lines where DEVCO directorates report to thematic directorates and an overall report synthesizes the findings and responds to key issues. The first reporting of this kind took place in 2014.

<sup>55</sup> The country fiches are produced by DEVCO and EEAS and provide an overview of developments and EU work in each country. They are periodically updated.

<sup>56</sup> It should be noted that the whole QSG process is preceded by extensive consultations between the EUD and the thematic/sector desks and the geographical desks at HQ. Thus, by the time the file reaches QSG 1 several of the participants have already had their comments integrated into the AD.

<sup>57</sup> E.g. the Multi-Annual Action Programme 2015-2017 which was adopted for CSO-LA in 2015, which will improve complementarity and coherence while enabling longer-term planning of implementation; EIDHR was equally adopted as a Multi-Annual Action Plan for 2016/2017, thus giving more predictability and allowing for better complementarity for the CBSS implementation at Delegation level; Directorate H has prepared an Implementation Plan for the period of the NIPs 2014-2020, which should also be an important planning and coordination tool between HQ and Delegations.

<sup>58</sup> The multiplication of sectors was clearly in evidence in the Burkina Faso case study, for example.

<sup>59</sup> For example, the effort to reduce the workload by simplifying the PRAG procedures (involving EUDs only at proposal evaluation stage, not concept note evaluation stage) has in some cases caused extra work later when sensitive proposals slip through, or if projects are disconnected from local realities or are not aligned fully with NIP sectors.

<sup>60</sup> This section has been summarized from a longer analytical piece on joint programming which can be found in Annex 12.

<sup>61</sup> EU joint programming refers to joint planning of development cooperation by the EU development partners working together. Joint programming has been prioritized by the EU since 2012, after pre-Busan studies found that aid fragmentation had increased, in particular for EU countries. This resulted in specific Council conclusions and renewed efforts from the EU to promote joint programming.

<sup>62</sup> The majority of these challenges reported in the CIR survey relate to internal EU issues on the nature of the instruments (15 responses), and a smaller number to external challenges related to the coordination with other donors (7 responses).

<sup>63</sup> E.g. the EDF's EA-SA-IO RIP, only one of the five regional envelopes, foresees a total contribution of €525m for the AfIF, while the total envelope for infrastructure in the Pan African Programme is €200m of which only a portion is expected to be used for the AfIF (see: [https://ec.europa.eu/europeaid/sites/devco/files/mip-pan-african-programme-2014-2017\\_en.pdf](https://ec.europa.eu/europeaid/sites/devco/files/mip-pan-african-programme-2014-2017_en.pdf))

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