VOICE consolidated reply

ECHO questionnaire The Union's Humanitarian Aid: fit for purpose?

1. GLOBAL TRENDS AND THE UNION'S ACTION

a) Are there other important trends and issues that should be taken into consideration to further increase the efficiency of the Union's humanitarian action?

- The changing context for humanitarian aid also implies the need for: more research and capacity building for urban response; inclusion of effects of climate change into planning; better focus on inclusion of vulnerable groups in all phases of humanitarian action and the inclusion of their specific needs in ECHO sectoral policies; improved consideration of gender in disaster and conflict; a broader approach to forms and thematic areas of humanitarian assistance (e.g. education in emergencies)
- It should be understood at all levels that humanitarian work is not free of risk. The trend to subcontract
 risk to local actors should also be critically looked at. The increasing pattern of attacks on humanitarian
 workers and the consequences of this for access to affected populations are serious challenges. Without
 secure access, it is impossible to programme. Obstacles to access also include local administrative
 constraints. Humanitarian actors are continuously exploring and piloting new and innovative ways to
 respond effectively to insecure contexts, including by working remotely and the use of technology to
 provide monitoring and accountability. The EU should support such efforts.
- Decreasing budgets on humanitarian response risk leading away from the principle of impartiality to difficult choices on needs and vulnerabilities to be given priority, as well as countries to be given priority. Funding flows and coordination have become more complex; implementing organisations have also experienced an increased administrative burden from donors over recent years.
- Accountability to and participation of local stakeholders including beneficiaries is also important for improved humanitarian action. Decision making should be as close as possible to the affected people.
- More analysis is required of the trend towards criminalisation of aid and whether EU/other donor measures pose an obstacle to effective humanitarian action.

b) Are there other concrete ways in which the Union's comparative advantages could be further used to fulfil the EU's humanitarian mandate?

- The European Consensus on Humanitarian Aid represents a comparative advantage as it is a comprehensive framework for principled humanitarian action. More binding enforcement of the Consensus would enhance its value, so it should be considered to have a peer review mechanism for Consensus implementation.
- ECHO's well-informed field experts are a key advantage. Field experts could engage more openly at technical meetings/donor group representation at country-level. The system of TAs in the field needs to remain separate from the EU delegation.
- More joint/coordinated lobby and advocacy by ECHO and Member States is important
- European civil society expresses a high level of solidarity with disaster affected communities this should be reflected in the level of funding for humanitarian aid, and the diversity of actors receiving funding including NGOs.
- Continued access to the Emergency Aid Reserve is essential to ensure that ECHO can respond to new crises without undermining (or undervaluing) their commitment to ongoing disasters.
- The EU, as a humanitarian and development donor, has the potential to model better LRRD practice.

2. CONTEMPORARY HUMANITARIAN CHALLENGES: IS THE UNION ADEQUATELY EQUIPPED TO RESPOND?

2.1 Upholding humanitarian principles, IHL and advocacy

2.1.1 Humanitarian principles

a) Has the EU sufficiently insisted on the respect for humanitarian principles in general and in specific crisis contexts?

Yes BUT had to say no. since there are improvements possible and otherwise couldn't put this in No I don't know

b) If not, what actions should be taken by EU to uphold the principles and objectives of European humanitarian and, as well as humanitarian aid globally?

Suggestions for further improvement:

- Implementation of EU commitment to humanitarian principles needs to be strengthened through development of clear indicators, guidance & compliance mechanisms for governments/intergovernmental organizations. An independent authority should monitor compliance. EEAS should sign up to the Consensus since it deals with fragile states and crisis situations. Not using humanitarian aid as a crisis management tool provides the strongest foundation for the provision of effective principled humanitarian aid.
- The European Consensus should be integrated into national policies. Humanitarian departments should raise awareness and respect of the Consensus across relevant government departments and military, to avoid instrumentalising aid in an EU Comprehensive Approach. The EU can be compromised by the behaviour and specific interests of Member States. Member States should establish mechanisms for independent annual reviews of their implementation of the Consensus principles in national policy, including assessment of adherence across relevant government departments. The findings should be shared with stakeholders at national level to improve transparency & monitoring capability of parliaments and civil society.
- In relation to host/recipient governments, more advocacy can be undertaken by EU delegations /ECHO representatives ensuring an enabling environment for humanitarian aid. Through the GHD initiative. OECD-DAC committee and political dialogue, the EU has a role promoting principled humanitarian assistance with emerging donors. Given the EU 'bloc' representation at the UN, opportunities should be taken to defend and promote humanitarian principles.
- ECHO should support partners incl. NGOs in working with/ promoting humanitarian principles. Priority should be given to the needs of vulnerable groups, esp. women, children and older people. Sex and age disaggregated data has to be produced in needs assessments and funding proposals/ reports.

c) Are there other issues that need to be covered under this section?

- Humanitarian aid is not intended to solve political crises. Appropriate solutions have to be found by the relevant political institutions. While in a crisis humanitarian aid will have to be coordinated with relevant political measures, it should never be subordinated to political objectives or be communicated as being part of the political objective. Preserving independent humanitarian decision-making is necessary to implement the EU's humanitarian objectives. The EU must, when strengthening coordination and crisis management, respect the distinct mandate and priorities of DG ECHO. This applies also to relevant line ministries and departments responsible for humanitarian affairs at the Member State level, and to decision-making on allocations of humanitarian funding.

- There is a concern that efforts by donors to constantly push the humanitarian envelope wider to include more early recovery, DRR, resilience, etc. agendas means that humanitarian action may be losing its specificity. More needs to be done to ensure a clear understanding of the different roles and responsibilities of humanitarian, development, military and political actors.

- It is critical that EU donors ensure that humanitarian aid is based on the needs of affected people rather than other priorities.

2.1.2 Advocacy for international humanitarian law

a) Should the EU act more forcefully to increase the respect of and compliance with the IHL?

☐Yes ☐No ☐I don't know If Yes. how?

Adherence to IHL is particularly bad in non-international armed conflicts. The EU should collectively use its influence on conflict parties to ensure that they comply with the core principles of distinction, proportionality and precaution, and that they allow humanitarian organisations to access conflict affected populations. EU Member states have a strong responsibility, particularly in those situations where they have a solid partnership with the affected state in question (e.g. France-Mali). Explain them how to comply, in coordination with the ICRC, which is more specialised in silent diplomacy. Compliance can also be reinforced if mechanisms available in other areas of bilateral relations are used in a coherent and coordinated manner, e.g. executing human rights clause in preferential commercial agreements. The EU should also lobby non-signatory states to sign up and comply with new IHL frameworks (additional protocol I+II, Ottawa treaty, Convention on Cluster Munitions). Interacting with governments and donors who do not live up to IHL is important to raise awareness.

In order to monitor the promotion of IHL and implementation of the EU Guidelines on IHL, the EU should maintain its dedicated reporting system.

However, the best way to convince conflict parties, host governments and other donors to respect IHL and grant access to affected populations is by showing adherence to IHL principles in own policy and practice. The word 'humanitarian' should only be used at all policy levels in the EU for actions in line with humanitarian principles (several EEAS press statements). In addition, training on the Oslo/MCDA guidelines, IHL and other relevant legislation should be included both in basic officer training and in the pre-deployment training for military and political staff of member states and EU institutions going on mission in crisis prone countries, as well as EU delegations.

b) Are there other issues that need to be covered under this section?

- Humanitarian donors should consider funding more activities to raise awareness of IHL, among conflict parties. Also supporting analysis through an IHL lens at country level could help, through the secondment of technical experts to the office of the humanitarian coordinator.
- It is important for DG ECHO to make clear that given their principled approach, they have no links with the ICC.
- Respect of IHL should be at the core of "responsibility to protect" and "human security" concepts.
- The Commission and Member States / humanitarian actors do not all hold the same position on remote management and cross border humanitarian activities. More discussion would be useful, with the needs of affected populations first in mind.

2.2 Effectiveness of aid and thematic issues

2.2.1 Resilience, emergency preparedness, disaster risk reduction (DRR), and linking relief, rehabilitation and development (LRRD)

a) Should the Commission reconsider financing principles and priorities (i.e. by adjusting focus from geographical criteria to (more) horizontal ones and scaling up activities that increase the resilience of vulnerable communities?

□Yes □No

I don't know BUT had to say no, since otherwise couldn't explain why we answered this

Explain

Question not clear.

While ECHO should remain involved in the discussions relative horizontal issues such as community resilience, DRR and LRRD, it needs to remains specialised to the purpose for which it was established. DRR and strengthening community resilience are important and greater funding must be made available from development budgets, but not at the expense of funding humanitarian response, which is ECHO's core mandate.

While there is no general agreed definition of <u>resilience</u>, it should strive for 'community resilience' rather than stabilisation, fragile/failed states and security considerations.

There needs to be open, flexible and transparent programming, including by DEVCO, and on more than food security. ECHO would need to have clear indicators to intervene early enough and determine when to start a resilience initiative before a situation becomes a 'crisis'.

To improve <u>DRR</u> better connectedness across the EU institutions is needed, particularly through more attention and funding from DG DEVCO. The EU should increase media attention for early action and DRR. Bottom up emergency response plans from humanitarian actors could be pre-approved for ECHO funding for known risks and likely scenarios. Investment could then be made to build the capacity of local institutions to mitigate, prepare and respond to emergencies in the long term.

<u>LRRD</u> is increasingly recognised but in practice the linkage between humanitarian and development programmes is not yet sufficient. The EU would benefit from closer coordination between ECHO, DEVCO and the EEAS. A common vision of the relationship between relief and development is needed and where possible the EU should work towards that goal. Clear guidelines/an action plan on LRRD are needed, which also consider Linking Development to (future) Emergencies.

In addition, it is important to keep in mind that NGOs may find it hard to get co-financing for resilience activities as these are less likely to be visible in the media.

b) Should the Union's humanitarian capacity-building measures be expanded to regional/national levels in disaster-prone parts of the world?



Explain

The most crucial level is the local authority district level, where most emergency response activities take place. But building capacity at regional and national levels is complementary, as it can help to understand the challenges and obstacles at that level, as well as provide space for advocacy with national actors to the benefit of the local level. That increased capacity should then be used to the benefit of future disaster stricken populations.

However, these activities should not be done under humanitarian aid; it is not ECHO's mandate and it would be at the expense of other (shrinking) humanitarian funding against rising needs. In contrast, governments and national/regional platforms have opportunities to seek funding for further capacity development (e.g. GFDRR), or it could be done through enhanced bilateral development funding. In the mid- and long-term DRR is an issue to be taken up by governments as a government responsibility, but in the mean time more

could be done at the level of DEVCO to mainstream DRR into development programming (both national and regional).

The community based DRR approach works well but there needs to be better linkage with DEVCO for turning these 'pilot' initiatives into something more comprehensive where NGOs are able to create linkages at all the right levels in a country to make the system follow-through effectively and where programmes longer than 15 months can be run.

Alternatively, if the EU, including the Member States, would want to do more in this respect, they could also consider doing this through their civil protection units.

c) Should the scope of preparedness work be extended beyond the current focus on natural disasters in recognition of links between the natural, man-made/technological and complex emergencies?

Yes	
No	
l don't	know

d) Should the DIPECHO's 'community-based approach' be also used to build the capacity of emergency response structures of disaster-prone countries, possibly building on the experience of civil protection authorities inside the Union?

_ Yes	
No	
I don't	know

Explain Question very unclear.

Resilience can only be built if societies are willing and able to mitigate, prepare and respond to emergencies on every level, from communities who are often the first responders up to local and national emergency management authorities to international actors who can act as a back-up. The different levels need to be linked. Therefore, while DIPECHO's community-based DRR is very much appreciated, appropriate and worthy to be scaled up as an approach, it is important that the responsibilities of national and regional response structures are not delegated too much to community levels.

Clear roles and mandates must always be ensured between civil protection and humanitarian actors as a basis for complementarity and added value in terms of knowledge and skills. Equally, good knowledge and experience regarding developing countries and specific local contexts would have to be ensured. Very careful choices need to be made when using civil protection agencies certainly in conflict- prone countries, especially since some EU member states' civil protection agencies are closely linked to Ministries of Defence. The humanitarian principles as well as Oslo and MCDA guidelines should be respected.

Engagement using standards and operational experience from national reputable and relevant organisations can make a contribution to building emergency response structures in third countries as a government-to-government initiative. Moreover, this should not just be a one way process: good practice in resilience and emergency planning in developed and developing countries need to be shared. If civil protection agencies are involved in capacity of emergency response structures, the funding should come from the civil protection budget line, in addition to the DIPECHO community approach.

e) Should ECHO remain involved in protracted crises through humanitarian aid or should there be clearer humanitarian exit strategies?

☐Yes, should remain involved
☐No, focus on exit strategies
☐I don't know

Explain

While a focus on exit strategies is necessary in order to avoid aid dependency and maintaining the status quo, a quick exit is not always possible and acceptable. As long as conflict is going on and there is no political solution, the humanitarian imperative remains and ECHO must be engaged. Humanitarian aid is about responding to humanitarian needs, not about how long the crises last. At the same time, while humanitarian aid is delivered, political bodies of the EU have to work on conflict resolution. The international community should not use humanitarian aid to "forget" the conflict.

Humanitarian donors, including ECHO, should remain focused on quickly responding to new needs, but protracted crises in principle allow for a more development mode of working. Funding mechanisms must thus be adapted to allow a shift in programming towards rehabilitation and development or back to humanitarian aid if necessary. When humanitarian aid exits, there should be a link with development donors. As long as this is not the case, humanitarian funding will have to be stretched and humanitarian actors will remain in 'emergency operation mode' and be criticised for that.

In essence, humanitarian assistance is not a mechanism for long-term response to underlying causes of vulnerability such as poverty. Longer term responses should be developed and funded separately from humanitarian budgets, so ensuring that funds for life saving humanitarian contexts are available when needed.

f) Should DG ECHO jointly with its development colleagues develop risk analysis, define strategic priorities for resilience and align its programming priorities?

__**Yes** __No __I don't know

Explain

Too many issues in one question – don't agree with all.

Understanding the likely risks and disaster scenarios is important for identifying action to build resilience and build local and national preparedness actions, as well as for planning how emergency response funds within the humanitarian system may link with longer term systems for timely effective and co-ordinated emergency response. Joint risk analysis between EU, Member States and other stakeholders (in particular NGOs and CSOs) is thus to be encouraged. However, it is essential to then use the findings for decision-making.

ECHO should continue to support actions that are only applicable to a humanitarian phase; resilience may not be relevant in certain humanitarian interventions. While all agree that complementarity and links are important, it should be kept in mind that humanitarian aid has a specific function. To encourage overemphasis on complementarity or require alignment and coherence can make programming choices contrary to humanitarian principles and a needs-based approach. Lastly, it might simply be too difficult to align priorities where there are vastly different viewpoints and timeframes, and more importantly vastly different needs.

Cooperation with EU development also depends on context. A clear distinction must be made between countries with complex emergencies (different approach in conflict because of humanitarian principles) and disaster affected/disaster prone countries (LRRD/DRR cooperation easier).

g) Should the Commission undertake (i) mandatory fragility analysis, (ii) joint humanitarian/ development funding strategies for specific post-crisis contexts, and/or (iii) joint assessment missions to ensure that an early post-disaster recovery facilitates an effective LRRD?

	Yes
	No
	I don't know
Explain	

Too many issues in one question – don't agree with all.

<u>Fragility analysis</u> should be included in contextual analysis, and is essential to understand the socio-political risks that could create an emergency situation. It would also encourage joined-up thinking between ECHO & DEVCO, which is particularly important in disaster-prone countries as well as protracted crises. This cooperation should happen both in Brussels and at country level. However, it would be more cost effective and timely to use a reputable source for fragility analysis instead of requiring an additional mandatory analysis. A more preventative approach based on risk and vulnerability analysis is needed from the development sector, in order to reduce dependency on emergency response.

A joint funding strategy based on a joint assessment with emphasis on LRRD can ensure funding which is timely, predictable and flexible, prior, during and after disasters. This is possible through maintaining an envelope of non-programmed funding in development instruments which is proportionate to the vulnerability of a country to natural disasters and emergencies. However, the specific comparative advantages of development and humanitarian aid should be kept. Joint strategies should not endanger the nature of EU humanitarian aid, based on humanitarian principles, since development policy may be more linked to political interests. Moreover, any joint work should be based on assessed needs, not on a definition of the type of crisis or on a theoretical continuum/ contiguum from emergency to development

While <u>early recovery</u> processes should be encouraged, we cannot really claim that, as a cluster/area of work, this has been a success to date – partly because there is no real agreement on how and when it is supposed to be applied.

h) Are there other issues that need to be covered under this section?

- The EU should clarify the term 'resilience'. Resilience should be a shared responsibility between DG ECHO and DEVCO, and not open the door to include humanitarian aid into coherence, comprehensive approach agendas, etc. without respect for humanitarian principles. In addition, if resilience is to e.g. make sure all the food aid supported currently has a better focus on resilience, it is a good idea. However, if focusing on resilience means humanitarian actors cannot do immediate activities on health and wash, NGO partners would not support it. A contradiction can be identified between the increasing emphasis on resilience as a priority and the humanitarian mandate of ECHO.
- A concerted global approach to building resilience can be supported by post-2015 frameworks
- Funding for DRR should reflect real risk and be directed to where it is needed most. ECHO should
 influence member states that they also make possible and/or increase funding for preparedness and
 disaster risk reduction, especially in development budgets, which will enhance community resilience
- DRR funding should be accessible to NGOs as development and humanitarian actors for programmes at local, national and international level.
- For multi-mandate organisations that seek transformational change in the lives of their target groups, current funding structures often inhibit the envisaged ways of working, despite evidence of success with more flexible sources of funding.
- There should be more linkages to other actors beyond the EU institutions and Member States that are of
 relevance to realizing effective LRRD in a given context, such as host governments.

2.2.2 Quality of aid and sector policies

a) Should the Union more forcefully pursue the quality of humanitarian aid and donorship (at European and/or global level)?

Yes
No
I don't know

If Yes, how? What should be priority actions in that respect (standard-setting, peer-reviews, cooperation with emerging donors)?

As a first priority the EU should focus on its own delivery of principled humanitarian aid. Combined with its leadership, the EU will this way set a standard for quality humanitarian aid and donorship. The best way to ensure quality, within and outside the EU, is by promoting respect for existing humanitarian standards, the humanitarian principles and IHL, as well as GHD principles. While not all donors may agree to humanitarian principles, creating the space for dialogue and increased transparency on donor policies can only be helpful. The EU should also encourage other donors to have a quality framework for their implementing partners (adhering to e.g. Sphere & Red Cross Code of Conduct).

While cooperation with emerging donors is important, the focus should be put on strengthening coordination and complementarity within the EU, among Commission and Member States, given that together they are the largest humanitarian donor. In particular the good work begun in the COHAFA should be continued further; share best practices, adhere to the standards above, promote and monitor the Consensus and its principles; continue to engage in OECD DAC peer reviews.

On top of its own coordination, the EU needs to continue to engage in UN coordination mechanisms and at the global level to ensure coherent sector-approaches and effective and transparent delivery and decision making involving beneficiaries.

Quality depends on many factors, of which standards are one. Others include attention to needs assessment, good monitoring, sharing of lessons learnt, support for innovation and adequate funding for the needed resources to support this kind of activities. The importance of standards therefore should not be overemphasised.

b) Should the Commission and Member States aim to develop joint/common reference policy guidance in the thematic/sector humanitarian aid areas, based on international best practices? Should there be common sets of key indicators and measurement of results?

☐Yes
☐No
☐I don't know

Explain

- The Commission has over the last years invested in the development of numerous and varied sectoral policy documents with the input of partners and the wide humanitarian community. Rather than developing further policies, attention should now be given to their relevance to operational practice. A first step would be clarity on the application of the different existing sectoral documents (funding criteria, best practice, policy statement etc.) Then such policies could be promoted with Member States to contribute to harmonisation and shared best practice. Policy guidance based on best practices should not end up on mandatory standardisation and technical frameworks. If implemented successfully, joint reference policy guidance could strengthen the quality of humanitarian response, including accountability to beneficiaries, and simplify the operating environment for NGOs. ECHO should (financially) support workshops and tools to facilitate partner use of sectoral policies and which support quality and accountability.
- Indicators and measurement of results must be simplified, feasible and focused on the most important issues not to overload implementing organisations. However, the EU should rather join and/or support existing international initiatives e.g. Sphere, than reinventing the wheel and setting up new indicators. This would save resources, contribute to harmonisation and reduce the administrative burden.
- Whichever common indicators are to be agreed upon, they should be based on broad consultation with implementing agencies and developed in a way that takes into account the difficulties of working in complex contexts, and specifically consider the efforts of organisations seeking to reach the least accessible affected populations.

• However, common indicators are not a guarantee of quality of interventions and room for flexibility and innovation is to be preserved given the nature of humanitarian aid.

c) Are there other issues that need to be covered under this section?

- While accountability, especially to disaster affected communities, is not a 'core' principle, it is an essential issue and one that would merit better inclusion in the 'Fit for Purpose' paper, and further discussion with partners.
- There is a need to look more into the issue of protection as an important element of quality in humanitarian assistance.
- ECHO should follow the work being done under the Joint Standards Initiative and the SCHR project on certification (two initiatives in the area of quality launched by NGOs).

2.2.3 Direct and indirect aid delivery

a) Should the Commission conduct more direct operations?

Yes
No

I don't know

If Yes, in which areas? - had to leave this out, since not possible to explain when answering 'no'

Keep and step up the ECHO flight, and look into other logistics support

b) Are there other issues that need to be covered under this section?

ECHO's current partners consist of a vast array of professional humanitarian organisations that implement humanitarian aid. ECHO has not been set up for direct delivery and should abstain from that.

The risk with ECHO becoming more involved in direct implementation is that, due to the EU's prominent role in world politics, doing direct humanitarian implementation would risk the safety of not only ECHO but also other implementing organisations, including partners in the field. It is important to keep the separation between EU foreign policy and humanitarian aid as clear as possible, which would be endangered if ECHO would get involved in direct implementation. The example of UN agencies wearing three hats when being involved in coordinating, funding and implementing at the same should thus not be followed. Funding and external monitoring should be kept separated from implementation.

ECHO should conduct direct operations only in those cases where a) a necessary service can be provided to support implementing partners (e.g. logistically) to better implement their programmes, and b) if such a service cannot be conducted by partners or other implementing agencies ensuring the necessary professional *and* humanitarian standards. Cost efficiency calculations should be done to ensure that there is a strong cases for services such as providing e.g. logistic support benefiting of the programmes and beneficiaries in that region.

2.2.4 Coherence with civil protection assistance

a) In which additional areas synergies between humanitarian aid and the European civil protection assistance would be most beneficial? Why?

European civil protection institutions do not yet have the needed expertise or experience to deliver humanitarian aid. The technical capacities and skills of these two sectors must be clearly recognised and differentiated. Civil protection assets from EU member states should be used based on humanitarian needs assessments and in the way spelled out in the Consensus. In line with art. 60 of the Consensus, civil protection should not be used to support humanitarian aid in conflicts or complex emergencies. This is

especially the case where the same Member State who would provide the civil protection assets is politically/militarily involved in conflict. In conflict situations, the governmental nature of civil protection may pose challenges, as the humanitarian principles of independence, neutrality and impartiality are crucial for the acceptance of humanitarian actors, including NGOs, in those areas.

If there are synergies, they mostly occur in a highly technical context, e.g. rescue operations in the aftermath of natural disasters. Also risk and scenario analysis and mapping could be coordinated.

b) Are there other issues that need to be covered under this section?

- Civil protection should rather focus inside Europe, while humanitarian aid is intended for outside Europe. Inside Europe, coordination between European civil protection and European NGOs who have a domestic response mandate including simulations would strengthen capacities.
- Focusing more on delivery of in-kind aid through civil protection would be a step in the wrong direction. The trend in humanitarian aid is going towards more cash based interventions, and secondly it is much more effective to let implementing organisations on the ground decide (along with beneficiaries) what and when they should have in-kind items, and then purchase them on the spot.
- With a strong focus from donors on accountability to beneficiaries, careful consideration should be given to the degree to which civil protection agencies are able to fulfil this key aspect.

2.2.5 The use of military assets and Common Security and Defence Policy (CSDP) crisis management tools

a) Do you think that the interaction between humanitarian and military actors is sufficiently well-framed and articulated or does it need to be better spelled out?

Yes, it is sufficiently framed

No, it needs better spelling out

I don't know

Explain

- Existing policy frameworks are clear but often not honoured. MCDA guidelines show clear limits to the
 use of military assets in conflict settings ('last resort') and should be respected. The use of military
 assets to support humanitarian aid in a conflict setting should be clearly avoided in cases where EU as a
 whole, or EU member states, are a party to the conflict. In natural disasters the approval of the use of
 military assets by UN leadership and national government is a must.
- With regards to the conflict in Libya, EU Council Conclusions for the first time stated that military assets would be used to support humanitarian operations only if requested by UNOCHA, thereby setting a positive precedent of respect for the Consensus and the MCDA guidelines.
- Training and awareness raising are still absolutely necessary though, as there is still a lack of awareness of the relevant guidelines on the side of many actors involved in humanitarian crisis, including NGOs.
- In addition, IHL and Oslo & MCDA guidelines need to be translated to field reality. The trend in recent crises to develop context specific guidance based on these guidelines has, to date, been appropriate, but it is important to ensure that any future guidance notes maintain the current degree of rigour in ensuring consistency with the core documents. In a number of contexts, these guidelines for civil-military interaction have actually been developed together with military and other key actors (e.g. Afghanistan). However, these hard-fought guidelines are not always officially adopted by the military and/or not effectively rolled out to all personnel.
- The trend towards integration of humanitarian funds for example in stabilisation funding, or the offer of funding via military bodies such as PRTs, makes it difficult for humanitarian actors to operate in a principled manner. NGO access to humanitarian funding should be ensured even when their position conflicts with a government's political agenda.

b) Should the Commission further step up its dialogue with crisis management structures and military actors with a view to further clarifying the scope for coordination and eventual cooperation?

∐Yes ∐No ∐I don't know

Explain

Stepping up dialogue with crisis management structures and military actors is important to raise awareness, clarify expectations, roles and mandates and avoid confusion and erosion of humanitarian principles, especially in light of developments towards an EU Comprehensive Approach. This should lead to the signing of the European Consensus on Humanitarian Aid by the EEAS, improved information sharing and coordination, as well as defining red lines. However, ECHO has to remain outside the EEAS in order to keep its humanitarian mandate. As the European Consensus states, 'humanitarian aid is not a crisis management tool'.

There will continue to be instances in which the deployment of military assets will be essential to the attainment of effective humanitarian responses to crises. Open lines of communication with military actors should then be maintained as well as with the politicians who determine the nature of their deployments, to ensure that decisions are based on clear understanding of respective roles and responsibilities. ECHO should provide technical support to EU crisis management services, ensuring their activities do not impact negatively on EU humanitarian actions.

ECHO should explore further the possible added value of including partners in EU multi-layer crisis management exercises.

There is a role for diplomats, EU delegations and the High Representative, complementing the Commissioner to advocate for humanitarian space and access in the field (both on a principled level and a practical level (e.g. visas)), as informed by ECHO. ECHO should ensure that the same diplomats and delegations have a clear understanding of ECHO's mandate. The ICRC and OCHA should continue to play an important role in negotiating with military actors in the field or in Europe, supported by civil society.

c) Should the EU step up its efforts to support the promotion of the Oslo/MCDA Guidelines globally?

∐Yes ∏No

I don't know

Explain

- All EU member states and other states that agree with the guidelines should respect them and apply them consistently
- The Oslo/MCDA guidelines provide very solid guidance in their current form on the use of military and civil defence assets in the context of natural disasters and complex emergencies. Therefore EU can complement OCHA in their ongoing promotion vis-à-vis new donors and host countries.

d) Are there other issues that need to be covered under this section?

- The status and role of private security companies involved in humanitarian aid needs to be clarified as well.
- Within the UN, it is important that UNDSS does not dictate the use of military escorts for humanitarian actors
- ECHO should consider a security focal point which also liaises with NGOs and become more engaged in supporting NGOs enhance their security management function.

2.3 Coordination with Member States

a) Should the EU step up its efforts in the coordination of the response to crises?

□No □I don't know

If Yes, what measures should be taken to achieve this objective?

Coordination is good but not if it goes to the detriment of time spent to respond to the crisis itself. Moreover, coordination should not lead to an overall reduction of budgets for humanitarian aid or to a complete delegation to ECHO of the duty of Member States to respond to disasters, which would lead to a loss of expertise and capacity on humanitarian aid in the EU.

Operational coordination should be left under the leadership of the UN but the coordination of donor funding and the alignment of sectorial and regional priorities to ensure coverage of all needs in a particular crisis could be done at EU level (reactive burden-sharing when a crisis happens, not pre-emptive division of sectors). In addition, it should be ensured that all disasters are covered and not just media-friendly ones. In bigger emergencies, ECHO could take the role of coordinator for EU humanitarian donors (joint assessments of needs and priorities, joint approach, coordinated interventions/no overlapping and competition, joint monitoring and evaluation)- if that is accepted by Member States.

In the field, one could consider e.g. joint 'communication/coordination' meetings with ECHO, UN, Red Cross, NGOs and EU Member State donors present on the ground, on an equal level. This could create synergies for co-financing. To improve burden-sharing, ECHO technical experts could offer to help in monitoring and evaluation of projects funded by Member States without field presence. This may however require additional resources.

b) Should the EU step up its efforts in the cooperation among Member States in the field of sectoral policies?

	Yes
	No
	I don't

know

If Yes, what measures should be taken to achieve this objective? See also quality question.

- The added value of having sectoral policy at donor level should be clarified (as against funding guidelines / partners' own policies etc.), and duplication with other established guidance avoided.
- If further sectoral policies are to be developed, then cooperation with Member States is relevant
- Not only Member States' input but also practitioners input should be taken into account, as in practice
 none of the Member States or ECHO are direct implementers of humanitarian aid. It might make sense
 to choose one specific policy area and seek to trial processes around its development over a period of
 time (at least a year) to see how best engagement and support could be garnered, and to then use
 learning from that process to inform the development of policy in another sector, but to do this in a
 gradual manner rather than trying to take on and require the implementation of too many areas of
 policy at once.
- If ECHO is developing sectoral policies which are endorsed by humanitarian actors (i.e. they are desirable, feasible etc.) then a situation where Member States adopt these measures as well should lead to simplification for partners. Alternatively, good examples from Member States could be adopted by ECHO. The common sectoral policies should then be consistently followed by donors.
- To some extent, this is more important to development than to humanitarian assistance though.

c) How can the expertise and know-how of the Member States be better brought into play to ensure the best outcome of EU's action in these fields?

• By sharing info on who can do what when how (the 'humanitarian yellow pages of the EU') and then effectively coordinate based on this info

d) Are there other issues that need to be covered under this section?

• Cooperation between Member States would be enhanced by Member States sending high-level staff to COHAFA meetings who have decision power in humanitarian aid

2.4 Work with partners

2.4.1 Scope and reach of partnerships

a) Should the Commission engage more with humanitarian NGOs in third countries?

Ye	s
No)
i	

I don't know

Explain

ECHO can currently communicate a clear message: European money, funding European NGOs- both of which play an important role for accountability and visibility. The essential character of ECHO's interventions as an expression of European solidarity through European organisations seems to be a key 'selling point' to ensure ongoing financial support from Member States. Many ECHO partners already work with third country partners and achieve good results, so indirectly there is already engagement by the Commission.

For increasing direct work, the following challenges are identified:

- Accountability, quality & transparency issues
- Different legal statuses of organisations in third countries
- The high administrative burden and capacities necessary for Commission projects
- What will be the modalities for ECHO to decide which organisations to work with?
- NGOs in third countries should also comply with humanitarian principles. In some cases, principles such as neutrality can be better enforced by INGOs. In addition, some work (e.g. protection) should rather be done by an INGO.
- It would increase the number of FPA holders beyond practical limits and ECHO procedures are not always well adapted to 'indirect' partnerships.
- Risk for admin burden, as it would imply more ECHO staff deployed to the field to provide more direct support to such organisations and the development of much more rigorous risk management process for identifying and supporting partners
- Project-centred (often 'stop-start') engagement with local NGOs does not provide the basis for longterm partnership and capacity building required to build them into more effective and self-sustaining actors

Further engagement should be considered for:

- capacity building, using complementary strengths of local and INGOs
- scaling-up the full participation of local NGOs in (fragility/risk/context) analysis & evaluation processes
- getting better access in conflict regions to people in need (if no possibility for INGO access)

b) Should the Commission interact more with specialised agencies of non-EU countries?

Yes
No

I don't know - BUT I had to answer no to be able to explain

Explain

 One should carefully consider whether to do this, as specialised agencies often have stronger links to government than NGOs or UN actors, which could be a danger for principled humanitarian approaches. As long as humanitarian principles and standards are respected, it could be considered to work with them, if it would lead to a better humanitarian response, so if these agencies really add value to the system and have a comparative advantage. As such, whether or not this should be done becomes dependent on context, the agency in question, the availability of alternative partners etc. • Particularly regional organisations are gaining experience and expertise, especially in terms of resilience and disaster response and management, so dialogue and engagement at the policy level could be a mutually beneficial exercise. Given that we would like disaster-prone countries to be able to provide their own humanitarian aid, this is worthwhile to engage in.

c) Are there other issues that need to be covered under this section?

- The first question has been the subject of a major consultancy by the Commission in 2012 so the results of that study should be taken into consideration.
- ECHO's partnership approach, using an FPA is an appropriate mechanism for humanitarian aid. ECHO has a diverse body of partners able to carry out quality humanitarian aid. Continued efforts to maximise the partnership via consultation are important. This includes involvement in designing intervention strategies by early discussion, to ensure stronger partnership. Enabling partners to choose the mode of intervention (e.g. by not requiring consortia actions) is important to maintain quality programmes.

2.4.2 EU contributions to pooled third-party funds

a) Should the Commission contribute to pooled third-party funds?

	Y	es
	Ν	0
	1	-l -

I don't know

If Yes, which and why? - Could not include this input is as we do not get the space to clarify why we said 'no'. Only a 'yes' could be clarified. Therefore this was included in section c)

The clear answer from VOICE members is no. Currently ECHO only supports specific interventions and this clear position should be maintained. One of the great strengths of the Commission is the knowledge of the context where it operates and its commitment to address humanitarian needs based on the principles. Moreover, it is important to keep the direct link between ECHO and its partners, which is one of ECHO's very much appreciated specificities (quality and partnership approach). In addition, ECHO would lose control over which sectors and groups it supports. By channelling funds through third-parties funds, ECHO would lose this direct involvement and the capacity to quickly react to a changing environment. Supporting pooled funds should be left to the choice of Member States, many of which are already engaged.

Moreover, there are challenges related to pooled funds:

- Are pooled funds respecting the humanitarian principles?
- Do they add quality, and are they sufficiently accountable?
- Pooled funds add intermediaries and complexity, including by delaying funding for implementing organisations.
- The cost to administrate a pooled fund detracts from the funds being used for direct implementation. Although pooled funds may in effect reduce to some degree the administration burden on a single donor, overall they may not be more efficient in terms of administration in the long run
- In many cases the funds are difficult to access for implementing partners, in particular for smaller and local NGOs
- It is unclear in some cases how funding decisions are taken (e.g. 'underfunded emergency window' of CERF)

b) How could the Commission ensure that contributions to the third-party funds are used fully in line with humanitarian principles and based on needs?

ECHO should maintain its current practice of only supporting specific projects (see above). If this stance would regrettably be changed, the same level of accountability as with a normal bilateral action should be

expected. To ensure that, ECHO should become a member of the management team for these kinds of funds to be able to influence decision making. Moreover, there would be a need for a well developed monitoring system, involving technical officers who understand the political context and challenges, who would need to assess:

- transparency and consistency of funding allocations
- predictability and coherence
- adherence to humanitarian principles.
- efficiency/speed of decision making
- adherence to Commission sectoral policies (monitoring quality)
- extent to which visibility requirements can be fulfilled
- careful selection of partners
- accessibility for INGOs and local NGOs
- added value for affected population

Given the additional administration for the Commission this would require, it makes the argument for thirdparty funds mute.

c) Are there other issues that need to be covered under this section?

- The so-far existing pooled third-party funds do not sufficiently address challenges of small-to medium scale natural disasters brought about by climate change, as allocations are made per country and not all countries prone to natural disasters are represented by a pooled third-party fund.
- It is not clear how ECHO measures the use of funds by multi-lateral donors, how ECHO evaluates value for money of, for instance, UN vs. non-UN partners.

2.5 International system, new donors, public-private partnerships and Visibility

2.5.1 International response system

a) What additional measures should be taken to further operationalise the objectives of the Transformative Agenda?

- Undertake a realistic assessment of the humanitarian reform process to see which impact it has had and what it has improved.
- The systems, mechanisms and procedures established by the Transformative Agenda for "Level 3" emergencies must be adapted and applied to smaller-scale events, which form the bulk of the crises that humanitarians respond to and which cumulatively are more destructive
- The Inter-Agency Rapid Response Mechanism must be resourced adequately, in terms of funding and by making suitably experienced personnel available for deployment.

Leadership:

- The EU should use its influence to ensure that procedures for appointing the ERC and the HCs are transparent and their selection based upon the competencies of the candidate, which should necessarily include humanitarian expertise
- Strengthen the role of the HC (no double hat) and his/her independence in UN integrated missions
- HCs and cluster leads should be held accountable for results
- Separate funding decision structures from cluster lead agencies (conflict of interests)

Coordination

- ECHO should continue to critically review UN performance in the sector of coordination and inclusion of national partners.
- In order to foster DRR and LRRD, there should be a link between clusters and local coordination systems to enhance sustainability and ownership. At present the link between disaster preparedness and disaster response is not clear.

Accountability

- There is little progress on accountability. As accountability is understood as transparency that actions of the response system are in accordance with the requirements of the target group, the target group needs to be able to give feedback to the humanitarian coordination structures.
- Respect for diversity (age, gender and any other form of diversity such as HIV or disability) is the basis for impartial humanitarian action and therefore essential for accountability.

b) How can the Union and its Member States best work together to ensure a genuinely more responsive and cost effective international response system?

- By giving the good example through good own coordination and by applying IHL and relevant guidelines.
- Respect the funding criteria donors have agreed upon through the GHD, particularly with respect to cross-country and cross-sector imbalances in funding, and to the timing of contributions. Currently, timing of contributions reflects donor governments' budget cycles more than operational realities.
- Simplify and thus reduce the administrative burden, both on the donor side and on the partners' side.
- Reduce duplications in policies, procedures and standards among Member States and the EU.
- Consistently support common quality standards and policies and ensure sufficient funding to allow agencies to deliver interventions based on these
- Connect disaster preparedness with disaster response
- Due to the problems related to the functioning of pooled funds and the importance of being able to respond effectively and quickly to emergencies, it is essential that EU Member States maintain bilateral funding to NGOs
- Support efforts towards more evidence-based humanitarian action. There needs to be a demonstrable link between funding allocations and needs assessments and analysis.
- Continue to support improvements in needs assessments and ensure focus on information which is critical for design/implementation.
- A responsive and cost-effective system is relative to context. By oversimplifying the difficulties faced by humanitarian actors in certain contexts, the system sets itself up to under-perform.

2.5.2 Outreach to the emerging donors

a) Should the Union step up its outreach to emerging donors?

/es
No
don't know

b) What should be the guiding principles of the cooperation with new donors?

- Mutual respect and open communication and recognizing the benefits and diversity they bring.
- In so far as possible, donors should be seeking to support the delivery of interventions in a consistent manner and at an agreed level
- Finding a way to communicate principles and minimum standards of accountability and transparency is possible when alleviating suffering is the shared goal
- Cooperation/Coordination with new donors regarding funding, compliance with humanitarian principles and IHL, access, and GHD.
- Sharing models of identifying 'quality' humanitarian actors/partners
- Promoting dialogue around humanitarian objectives/priorities in a given crisis
- Try to ensure their participation in UN coordination structures and existing funding systems, rather than setting up parallel systems.

• Engage new donors in issues such as DRR, LRRD, resilience, urbanization, gender-sensitive programming etc.

c) Are there other issues that need to be covered under this section?

 Make EU/ECHO expertise available to new emerging donor countries on request to support design of emergency frameworks

2.5.3 Public-private partnerships

a) Should the Commission step up its work with the private sector?

Yes
No

I don't know

If Yes, how and in which sectors of activities? - Could not include this input is as we do not get the space to clarify why we said 'no'. Only a 'yes' could be clarified. Therefore this was included in section c)

ECHO should ensure first of all focus on the issues most relevant to its mandate, so maybe the private sector is not the first priority. Moreover, the corporate social responsibility strategies of most companies have no link to humanitarian aid. To include private companies will only create more actors in an <u>already</u> <u>crowded market</u>, making coordination and compliance with standards even more complex.

Working with private businesses should be a means to improve humanitarian response to the needy. It should <u>not</u> become an <u>end in itself</u>. Private businesses should only be worked with if they deliver a service the public sector cannot provide. If those conditions are fulfilled, the private sector could be considered as a provider of resources in certain <u>niches</u>:

- Communication, data processing and sharing, logistics, cash and voucher transfer, port or airport management (DHL/UN cooperation), infrastructure
- Multi corporation insurance companies could be usefully involved in DRR (in development)

b) Should the Commission take advantage of private businesses' social responsibility schemes for humanitarian purposes in a more systematic way?

Yes
No

I don't know

Explain

The scale and duration of crises, and the resource pressure on donors means that there are gaps in terms of provision of humanitarian aid. Simply looking to cover these gaps with private sector involvement however is not straightforward. Any humanitarian actor should be committed and in a position to subscribe to humanitarian principles, standards and coordination mechanisms. The private sector will not be able to fulfil this in all cases as they have (shareholder) business interests and affiliations which are difficult to ascertain. Moreover, private businesses are often supply driven. Any "voluntary responsibility scheme for humanitarian purposes" will not overcome this fundamental conflict, despite their technical expertise and knowledge.

Often social responsibility is imposed/promoted by the national legal framework and used by the private businesses for communication purposes rather than for responding to humanitarian needs.

If the Commission would decide to engage further with the private sector then it needs to consider what is the appropriate context and how risks will be managed (e.g. unethical labour practices, or other corporate activities that conflict with humanitarian or ethical principles e.g. promotion by companies of formula feeding over breast-milk).

c) Are there other issues that need to be covered under this section?

• The OCHA guidelines on public-private cooperation for humanitarian action should be better disseminated as they are not well-known, even in the humanitarian sector itself

2.5.4 Information, communication and visibility

a) Is media coverage of EU funded humanitarian aid sufficient?

	Y	es
	N	0

I don't know

If Not, what in your opinion is the main reason?

Media coverage requires concerted efforts by communication professionals. Currently this technical expertise and capacity is lacking in ECHO.

The overall communication strategy is lacking or unclear.

As a result, communication actions appear too scattered, do not reach across the whole EU and are therefore not effective in raising the awareness of the general public. The main reliance has been on ECHO partners carrying out communications activities, who are not necessarily the best equipped for this role.

ECHO partners also have to seek own funding, including for co-financing ECHO actions and to support ongoing activities beyond ECHO actions including LRRD. They also have obligations to other donors. It is important therefore to get the balance right between donor demands and the NGO's own financial needs.

b) Do you see potential to improve it?

∐Yes ⊡No

I don't know

If Yes, in which concrete ways?

Strengthen ECHO's communication department, manned or supported by professional communication experts.

A communications strategy should be developed by ECHO, and shared with relevant stakeholders, including partners. Priority focus should be on communications raising awareness in Europe, informed by information from the field. Secondary focus should be on visibility of the EU as a donor in the field. The different rationales should be made clear.

Use the ECHO network of field offices and staff as primary source of information to support EU communication activities.

Prioritise media as a mass communication channel, and do additional outreach across Europe, via schools, universities, public spaces etc.

Include a focus on forgotten crises as well as high-profile emergencies. To increase attention, link communication activities with European social issues e.g. migration, remittances, high / low prices of food, climate change, environment, etc.

Show the human face of humanitarian aid through human interest stories of beneficiaries, local

governments and employees of aid organisations. This can include more real-time media work to bring the crisis closer to the donors, policy makers, as well as wider public in the EU.

In the field, visibility measures should seek to enhance accountability towards beneficiaries.

Consequences of visibility actions on efforts to support participation and ownership should also be considered e.g. showing a large logo on a project site demonstrates it belongs to you rather than to the beneficiaries.

c) Should the volume of communication activities on EU funded aid by implementing partners correspond to the financial size of their partnership with the EU?



d) Should requirements in terms of ensuring EU's visibility as a donor on the part of the implementing partner organisations be revised or increased in order to achieve better visibility of EU funded aid in the field?

Yes	
No	
I don't	know

Explain

Financial size of partnership and capacity to carry out effective communications activities do not always correspond. Operational capacity and level of activity does not necessarily imply communications expertise and capacity.

Obligations regarding visibility as described in the guidelines are understood and considered adequate at the implementation stage, including flexibility and possibility to derogate in certain circumstances (e.g. security). Partners consider themselves to be generally good at incorporating field-level visibility into programming. ECHO field offices often include visibility contact points and monitoring field level visibility efforts is usually a key part of TA's visits to partner activities.

e) Should the EU funded partner organisations play a role in the efforts for better media outreach?

Yes
No
I don't know

Explain

Yes - some partners depending on interest and capacity.

Humanitarian organisations are by their nature focused on delivering quality humanitarian assistance and prioritise operational concerns. Communications activities are secondary, and also resource-demanding. While some organisations may be able to contribute more to communications objectives with more resources, other organisations might not achieve the same. Communication and visibility initiatives should therefore draw upon those partners with strengths to add value.

f) Should DG ECHO take a lead in a joint communication strategy with partners in order to increase effectiveness in its communication with the EU citizen?

∐Yes	
No	
🗌 l don't	know

If Yes, what should be the main tools to implement such joint strategy?

Professional communications expertise (see above).

Media as a primary communication channel (wide-reaching).

Link in to relevant communication departments of organisations (i.e. not normal FPA contacts) who have capacity to contribute.

The strategy requires agreeing on clear objectives and clear messaging for possibly different population segments/countries.

g) Are there other issues that need to be covered under this section?

-

2.6 Humanitarian decision-making

2.6.1 Decision-making for the Union's emergency humanitarian aid

a) In your experience, does the decision-making process of the EU allow a timely and appropriate response to the various types of humanitarian crises?

Yes - but had to answer no since there was no space given to explain a 'yes', while improvements are possible

No

I don't know

b) If Not, what exactly should be improved, and how?

- Overall, ECHO is improving in terms of timely decision making, especially responding to new emergencies but also because of flexible HIPs.
- In several cases (e.g. Niger&Chad), ECHO has reacted well to early warning, resulting in quick and decisive funding decisions which helped partners to deliver very timely interventions that have ensured that the potential extent of the crisis has been mitigated.
- However, in some cases the initial amounts available for primary emergencies are insufficient to cover the needs in the first weeks of the disaster, and committing additional funds seems to be complicated and takes a long time. Delays have been observed as well when adapting and/or increasing funding for already existing HIPs.
- In order to speed up decision making, attention should be paid to simplification in the FPA revision, especially to which elements of information are necessary for the rapid assessment of a proposal in keeping with an emergency context. Emergency proposals for example could contain less detail at proposal stage via modular Single Form than proposals under HIPs.
- One of the major concerns of many VOICE members is the time it takes from the project being nominally
 approved by an ECHO desk officer to actually receiving the grant agreement. A form of pre-award letter
 issued after a decision could be a solution while a contract is being prepared. This would be very helpful
 to many partners. In many NGOs funds cannot be advanced without such a form of assurance from the
 donor. The full liquidation of grants often takes longer than anticipated which impacts on cash flow of
 partners.
- Several members also noted the need for a more transparent notification of emergency funding opportunities to improve accessibility for all ECHO partners, as well as clearer funding criteria in the HIPs, against which feedback could be given. ECHO should continue to ensure consistency of approach between Brussels and its many field locations (TAs).

c) Are there other issues that need to be covered under this section?

- APPEL should be regularly updated to reflect the actual situation. For example, on APPEL applications that have been rejected or have received no response, continue to appear as 'under negotiation'.
- In complex and protracted crises, EU decision-making processes are not yet sufficient to efficiently link relief rehabilitation and development

2.6.2 Evidence-based decision-making

a) In your experience, does the EU' approach to evidence-based humanitarian decision-making through GNA/FCA/FINAT deliver adequate results?

Yes
No
I don't know
How could it be improved?

- These tools are <u>relevant</u> and support evidence-based decision-making. They can support funding decisions based on humanitarian principles, especially impartiality. The FCA obviously helps with ensuring that there is a sustained focus on 'forgotten crises'. However, the question remains whether the <u>right conclusions</u> are always drawn when defining the sectors of primary engagement when drafting HIPs.
- There is a need to enhance the <u>transparency</u> of the process, and for example ensure training in these tools. Currently the GNA/FCA processes are very internal, whereas they should become more inclusive and participatory, which would increase ownership/use outside ECHO, including by Member States. These processes should be complemented by specific localised <u>assessments</u> <u>conducted by partners</u> to ensure that there is depth and accuracy of analysis and detail. Moreover, sometimes partners' needs assessments reveal needs which fall outside the programming sectors or geographic areas predefined in the HIP. Given that ECHO has assessed partner quality before issuing an FPA, these assessments should be taken seriously and included in decision-making processes. There is thus a need for more flexibility in the HIP in the light of such identified needs.
- It is unclear how the GNA may relate to inter-agency needs assessments, especially in light of the
 fact that many donors are pushing/requiring engagement with the new MIRA (Multi-Cluster/Sector
 Initial Rapid Assessment) methodologies and are seeking ever-greater coherence in terms of
 response. Similarly these instruments are not fully in line with CAPS/CHAPS and vice versa. While
 the relationship between these instruments should be considered and addressed, one should bear in
 mind concerns raised in relation to the 'homogenisation'/standardisation of responses.

b) How the Union can best contribute to the global evidence-based decision-making?

- The EU should ensure that the GNA/ FCA data is widely available for use by other donors and decisionmakers, including UN.
- Evidence-based decision-making can refer to different issues (different decisions to be taken). The tools
 used / measures taken should be considered accordingly. This may depend on the phase in the
 programme cycle (early warning/early action approaches; emergency assessments and the programme
 decisions resulting from them; impact/ results etc). Each stage may require very different approaches in
 terms of evidence gathering and utilisation.

c) Are there other issues that need to be covered under this section?

- It needs to be recognised that many agencies are already gathering and utilising information in an
 effective manner. Taking the evidence of an individual programme of an individual organisation to scale
 is hugely challenging though (e.g. Syria). Gathering information/evidence (including needs assessment)
 and establishing attribution for any apparent impact can be enormously difficult especially in complex or
 changing contexts.
- Donor policies and procedures should be reviewed to ensure there is enough flexibility to allow projects to continue to be driven by need (which may change during implementation)
- Evidence-based decision-making requires greater coordination and data exchange within and between EU institutions (DEVCO, ECHO, EEAS) and Member States.
- In order to properly link relief and development, an evidence base informed by DRR concerns should be used for development programming. This includes community risk mapping and participatory fragility and conflict analyses.
- Clear criteria in HIPs, and feedback on unsuccessful proposals will support continued improvement in increasing the quality of humanitarian actions.