

THE EUROPEAN CONSENSUS ON HUMANITARIAN AID: AN NGO PERSPECTIVE

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This report was researched and written by:



Full bibliography and annexes can be found
on the VOICE website.

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EXECUTIVE SUMMARY

European Union (EU) Member States, the European Commission and the European Parliament reached agreement on the European Consensus on Humanitarian Aid in 2007. It provides a strong policy framework and “common vision” for the EU and Member States in developing their humanitarian policies and strategies. It has also functioned as an important document for promoting humanitarian principles. In order to make the political commitment to this framework more concrete, an Action Plan for implementation was agreed upon in 2008. Given the commitment to abide by humanitarian principles and best practice enshrined in the European Consensus, it has enormous potential both to guide Member States in their humanitarian decisions and to allow NGOs to hold Member States accountable.

This study commissioned by VOICE -- *The European Consensus on Humanitarian Aid – an NGO perspective* -- presents an analysis of how EU Member States and NGOs have engaged with the Consensus and how it has informed Member States’ decision-making and policies. It seeks to explain the role the Consensus has played in influencing Member States’ humanitarian policy and practice, especially in relation to several key themes. By presenting findings from the view of NGOs, the study seeks to contribute to an understanding of what NGOs consider the crucial elements of the Consensus, and of EU humanitarian aid more broadly.

Several key tools were used to carry out this study. They include:

- a desk review of all EU Member States’ humanitarian aid policies and strategies, as well as other documents relevant to the Consensus and its principal themes;
- an online survey of 80 NGOs across EU member states and 17 humanitarian departments of EU governments;
- 7 NGO focus groups; gathering 85 representatives of 62 organisations in 7 Member States
- interviews with key stakeholders from NGOs, governments and international organisations

MAIN FINDINGS

The main outcome of this review is that **NGOs and EU Member States are united in their assessment of the value of the Consensus**, which, they say, derives first and foremost from the humanitarian principles that it promotes. The European Consensus has played a pivotal role in creating a common vision of best practice for principled humanitarian action.

While Member States are more familiar with the Consensus than NGOs, this is somewhat to be expected as the document is addressed to and signed by them. In many instances, Member States’ appreciation for the Consensus has translated into their humanitarian policy documents, as most make reference to the Consensus.

The key question relates to implementation of and compliance with the Consensus. NGOs see a gap between rhetoric and actual practice, and agree that they could do more to monitor Member States’ application of the Consensus.

The areas of the Consensus which NGOs feel need greater attention from Member States are very much in line with the components they consider most important: humanitarian principles and the added value of NGOs. Member States, on the other hand, most frequently responded that there are no areas in need of greater attention. The continued insistence on humanitarian principles from NGOs indicates that they see a gap between the emphasis on humanitarian principles at the policy level and Member States' actual implementation of these policies.

For both Member States and NGOs, **humanitarian principles are the most important part of the Consensus**. Humanitarian principles are very much present in Member States' humanitarian policies. NGOs recognise that the humanitarian departments of their governments make an effort to defend humanitarian principles in government decisions - but that they are not always successful in this.

However, **NGOs are critical of the application in practice of the humanitarian principles** and expressed concern over the independence of humanitarian decisions from other government priorities (political, economic, military, etc.). Participating Member States report that their non-humanitarian colleagues in government are not sufficiently familiar with humanitarian principles, but overall they are not particularly concerned about this unfamiliarity affecting humanitarian decisions. NGOs, on the other hand, see this as an issue that needs more attention. The interference with the humanitarian agenda from the political side of governments is seen as problematic, especially in high profile crises when ministers want their constituents to see them taking action. A significant number of survey responses stressed that one of the most important aspects of the Consensus was its focus on needs-based funding – i.e. practice derived from the core principle of impartiality. However, the NGO perception is that funding is often linked to non-humanitarian considerations.

There is recognition by Member States of the importance of questions of **humanitarian-military distinction and interaction**, and good examples of corresponding integration into policy. As a result, some Member States work to support mutual understanding by creating opportunities for dialogue between humanitarian organisations and the military. Such participation is likely to improve the knowledge of the military on the specificities of humanitarian action. However, NGOs are less certain that these contacts and exchanges will keep the military out of aid delivery, as mandates of military missions are determined by politicians. This concern has been illustrated by some cases of gaps between policy and practice.

Coordination between Member States and NGOs on humanitarian policy and practice at the national level is critical in ensuring that the humanitarian principles and other elements of the Consensus are respected and implemented. NGOs find their governments relatively accessible and, in many countries, meet quite regularly with humanitarian officials in coordination forums. Such forums with government agencies have been useful for NGOs to raise issues of concern and strive to influence government humanitarian policies and strategies. However, both NGOs and Member States agree that these encounters are not being used to their full potential to discuss strategic humanitarian issues. While having a meaningful dialogue seems to depend heavily on the individuals involved, a more systematic coordination could be useful.

The added value of NGOs in the response to humanitarian crises is one of the most important issues of the Consensus for them. **Funding to NGOs** is one way to measure the extent to which governments see the added value of NGOs and look to them to provide humanitarian assistance.

Two main conclusions can be drawn related to Member States' funding of NGOs: firstly, positive and open relationships do not necessarily translate into actual funding. Because of the reduced percentages of humanitarian funding going to NGOs (as opposed to the UN or International Organisations) in several Member States, the emerging picture is that ECHO has become an essential donor for the humanitarian operations of a number of NGOs.

Secondly, a number of Member States continue overwhelmingly to favour UN agencies when assigning their humanitarian budgets. This distribution of funds does not reflect the comparative advantages and the proportion of aid delivered by NGOs. The Consensus notes that NGOs are essential to humanitarian response as they deliver the majority of international humanitarian aid due to their field presence, flexibility and specialisation. NGOs feel that this reality needs to be better reflected in donor decision making.

Despite the Consensus promoting the reduction of **administrative requirements** on partners, NGOs report that this has not been the case. The administrative burden related to managing funds from EU donors is a significant concern for NGOs; this is not only a question of reporting, but can relate to donor information requirements at many different stages of the project cycle. It must be noted that there are diverging practices among the Member States. These differences beg the question of what should be seen as an appropriate balance between administrative requirements and flexibility, and at what point administration requirements start hampering the effectiveness of humanitarian operations and the efficient use of resources. NGOs also repeatedly noted that Member States have considerably more stringent administrative requirements for NGOs compared to UN agencies.

While certain components of the Consensus are easily identified and have been readily appropriated, others remain largely ignored and require greater attention, not only on the part of governments, but also by NGOs in their advocacy efforts to improve the quality and scope of humanitarian aid from the EU and its Member States. The review found that the areas of disaster risk reduction (DRR), preparedness and linking relief to rehabilitation and development (LRRD) are particular examples of this.

Some Member States have made an effort to incorporate **Disaster Risk Reduction** (DRR) into their policies and strategies. These policy efforts are important to recognize, but there seems to be a significant gap with regard to actual support in practice. Many other Member States have not demonstrated specific engagement with DRR. This confirms the general impression that finding the political will to focus on preparedness and prevention has always been challenging. It is therefore no surprise that there is little support to NGOs for DRR activities.

DRR contributes to overall sustainability efforts and is clearly an area in which there is significant room for NGOs to advocate with their governments for increased action, demonstrate their added value, and seek government funding.

Despite positive developments at EU level, Member States' efforts around **Linking Relief Rehabilitation and Development** (LRRD) vary significantly across the EU. Some Member States that are making greater efforts to develop a resilience agenda – which can support LRRD – are doing so within the context of their humanitarian funding streams, while others are pursuing it in their development programming. In all cases, however, NGOs feel that governments need to do more to promote both DRR and LRRD, clarifying and strengthening their approaches, linking development and humanitarian efforts, and increasing their funding streams and making them more flexible.

Despite the commitment under the Consensus to seek means to support capacity-building activities for the **strengthening of local disaster response**, in general, humanitarian funding from Member States goes to European NGOs, who then can work with or through local partners if they choose to do so. Capacity building is thus another area where efforts to engage with local partners have far to go, and it remains an area that requires much more attention, especially from development actors.

KEY RECOMMENDATIONS

1. Member States and NGOs should use the Consensus actively to inform both humanitarian policies and practice. Member States should use it as their core reference to ensure that their actions, funding and programming decisions are consistent with the principles contained in the Consensus. Member States should also continue developing national humanitarian strategies which reflect these principles.
 2. At EU level a follow-on Action Plan to the Consensus should be a key tool to support a coordinated and collective approach to a number of agreed priority areas. Member States and the Commission should commit to its joint implementation.
 3. Parliaments and NGOs should use the Consensus more to systematically monitor government behaviour and hold governments to account against their commitments.
 4. Member States should use the Consensus to ensure respect for humanitarian concerns in all areas of their policy and action. A wider understanding and application of the principles of the Consensus and their legal basis is important to avoid the instrumentalisation of humanitarian aid for political purposes.
 5. Member States and NGOs should engage in systematic exchanges on humanitarian issues. Learning from examples of good practice in some Member States should be considered by other Member States that have still to develop informal/formal coordination mechanisms. With regard to specific crises, early discussion and/or collaboration between governments and NGOs with field-presence is important to ensure that response programming and policy are informed by operational concerns.
 6. Dialogue between humanitarian NGOs and the military is particularly important to ensure clarity in relation to respective mandates and roles, and respect for and adherence to humanitarian principles. Member States should create opportunities for such dialogue both at planning and pre-deployment stage, and during engagement in the field.
 7. Member States should consider re-balancing the distribution of funds between humanitarian actors to reflect the comparative advantages and the proportion of aid delivered by NGOs. They should undertake a more thorough analysis of the comparative advantages of each of the three main operational humanitarian families – the UN, International Organisations, and NGOs – especially at a time when they put such emphasis on ‘value for money’ and results-based management.
 8. In the interest of aid effectiveness, Member States as donors should make measurable efforts to reduce the administrative burden for NGOs. This should include reviewing their information requirements at all stages of the project cycle. Member States should seek further ways to harmonise their administrative requirements and templates.
 9. The Consensus should be used as a tool to further work on LRRD and DRR by Member States, NGOs and other relevant actors. More effort is needed to raise awareness of the importance of investing in DRR measures, especially at local level, and to secure active integration of DRR into development policy and practice. Member States need to grant greater priority to LRRD by improving coordination between governments’ humanitarian and development agencies, and providing more flexible LRRD funding to allow partners to respond in a way that reflects evolving needs.
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INTRODUCTION

The EU is the biggest humanitarian donor in the world. EU Member States together with the European Commission fund humanitarian operations in crises around the world through a range of partners. European Union Member States, the European Commission and the European Parliament reached an agreement on the European Consensus on Humanitarian Aid in 2007. It provides a common vision and strong policy framework for the EU and Member States when developing their humanitarian policies and strategies. In order to make the political commitment to this framework more concrete, an Action Plan for implementation was agreed upon in 2008.

The 2010 mid-term review of the Action Plan notes that important progress has been made in relation to promoting humanitarian principles, sectoral policy development, needs assessments and needs-based funding allocation, capacity building and coordination. Also a Caritas study on the Consensus published one year later acknowledges the importance of the Consensus in these areas and, more generally, its role in securing greater commitment across the EU to principled humanitarian action (Caritas Europa 2011). The report also highlights, however, the continuing need for greater awareness of many aspects of the Consensus, both among Member States who have drawn up humanitarian policies as well as among those who still need to develop policy frameworks.

The Consensus has clearly played an important role in promoting humanitarian principles among EU Member States. Since its approval, other documents have followed, the most important being the Lisbon Treaty¹. Signed in 2009, this contains a separate article on humanitarian aid, the first time ever in an EU Treaty. This powerful legal reference is key to safeguarding and promoting principled humanitarian action at EU and Member State levels. The Consensus, then, is the foundation for EU humanitarian policy. Its importance lies not only in the role it plays in promoting good humanitarian policy, but also for its particular relevance to humanitarian practice. It serves as a benchmark across the EU for the implementation of programming. The European Parliament as signatory should monitor the implementation of the Consensus. The Consensus provides a framework by which stakeholders including NGOs can hold the EU and Member States accountable to their commitments.

This study commissioned by VOICE² - *The European Consensus on Humanitarian Aid: an NGO Perspective* - presents an analysis of how EU Member States engage with the Consensus and how it informs Member States' decision-making and policies. By presenting findings from the viewpoint of NGOs, the study seeks to contribute to an understanding of what they consider the crucial elements of the Consensus and of EU humanitarian aid more broadly, and which elements of it need a strengthened engagement from Member States. It seeks to explain the role the Consensus has played in influencing Member States' humanitarian policy and practice in relation to several key themes: humanitarian principles; humanitarian coordination at national level; funding to NGOs; administrative requirements; and the wider context of humanitarian aid, namely Disaster Risk Reduction, the link to development and support to local partners.

VOICE is a network representing 83 European NGOs active in humanitarian aid worldwide. VOICE seeks to involve its members in advocacy, common positioning and information exchange, and is the main NGO interlocutor with the EU on emergency aid and DRR. Its first objective, as reflected in its strategic priorities, is to promote respect for humanitarian principles. NGOs play a crucial role in delivering humanitarian aid, as they implement 60 to 80% of humanitarian aid worldwide. For this, they receive funding from donors including the European Commission department for Humanitarian Aid and Civil Protection (DG ECHO) and Member States. The Consensus is an important document for

¹ Treaty on the Functioning of the European Union, Art. 214.

² VOICE – Voluntary Organisations In Cooperation In Emergencies.

VOICE and it has worked to ensure awareness of the Consensus among its members to facilitate their advocacy efforts for principled, needs-based humanitarian aid towards their respective governments. Consequently, VOICE members have reconfirmed the importance of the Consensus and the need to promote it as a key policy document in the current strategic plan (2013-2017). From the NGO side, the VOICE network continues to take the lead in these efforts. It is the view of VOICE members which is presented in this study.

The report has a few limitations which are important to note at the outset. Firstly, this study is not an exhaustive review of the entire Consensus, but of selected key themes. Furthermore, the purpose of the review is not to question the continued validity of the Consensus in a rapidly changing humanitarian environment. Secondly, interviews with government officials involved only representatives of Member States' humanitarian departments and not a broader section of government officials. Thirdly, the study did not look at how Member States' policies translate into practice at the field level.

Europe is a place of great diversity, both between Member States and NGOs. This should be borne in mind when reading the case study examples given. For humanitarian aid as well as many other areas of policy, there will not be a 'one size fits all' solution.

Finally, it is worth mentioning that the opinions shared by respondents and interviewees are valued as their own perceptions and are presented as such.

METHODOLOGY

Several key tools were used to carry out this study. They included:

- A desk review of all EU Member States' humanitarian aid policies and strategies, as well as other documents relevant to the Consensus and its principal themes;
- An online survey of 83 NGOs across EU Member States and 17 humanitarian departments of EU governments;
- 7 NGO focus groups gathering 85 representatives of 62 organisations in 7 Member States;
- Interviews with 12 key stakeholders: 6 from NGOs and 6 from humanitarian departments in governments, the European Commission and international organisations.

The desk review of all EU Member States' humanitarian policies consisted of several steps. The first step was to identify within these policy documents the major themes and issues of the European Consensus as listed in the VOICE Terms of Reference. These are humanitarian strategy and principles; engagement with and funding for NGOs (reflecting the perceived added value of NGOs) and a diversity of partners; administrative requirements; the wider context of humanitarian aid, namely Disaster Risk Reduction (DRR), Linking Relief Rehabilitation and Development (LRRD) and support to local partners. An overall understanding of how the Consensus has influenced Member States' policy and practice was sought. For this, a matrix was created including each key concept, based on which Member States' relevant humanitarian policies and strategies were then reviewed. This offered an analysis of how governments have integrated key concepts into their policy frameworks. In addition, the humanitarian budgets of Member States were reviewed, including distribution among humanitarian actors, as per the Financial Tracking Service, which is based on self-reporting. This was especially useful to understand the percentage of funding Member States allocate to NGOs. Finally, other relevant documents on Member States' performance as donors and on the Consensus in general were reviewed.

In order to go beyond what is written on paper and assess how well NGOs consider that Member States actually apply the key concepts of the European Consensus contained in their policies, an online survey was carried out to measure these perceptions. Overall, 97 survey responses were received from over 20 different EU Member States, with 82% coming from NGOs and 18% from governments. The largest number of responses came from the UK, followed closely by Germany and then France. This correlates with the size of humanitarian NGO communities and VOICE membership in these countries.

The survey data was complemented with more in-depth qualitative information gathered in semi-structured key informant interviews and focus group sessions. The interviews also explored the issues from the European Consensus that are of concern to VOICE members (see above).³

The eight Member States were selected in agreement with VOICE and according to agreed criteria, such as geographic representativeness and size of humanitarian budget. The selected countries were the United Kingdom (UK), France, Germany, Netherlands, Spain, Czech Republic, Denmark and Italy. While the desk review and survey covered all Member States, the focus groups and interviews were thus carried out in these eight countries. These provided further specific insight into practice and included both NGO and government representatives.

The information gathered from the desk review process, surveys, focus groups and interviews have together fed into a comprehensive understanding of how Member States have applied the Consensus in their policy and practice, as well as how NGOs view Member States' humanitarian policy and practice.

³ For further details on the results of the survey, please see Annex 1.

1. APPLYING THE EUROPEAN CONSENSUS ON HUMANITARIAN AID

The EU – its Member States together with the European Commission - is the biggest humanitarian donor in the world, funding humanitarian operations carried out globally by UN agencies, the Red Cross Movement and NGOs. It is estimated that NGOs worldwide implement 60-80% of humanitarian aid operations. At European Commission level, this is reflected in the large number of recognised NGO partners funded by DG ECHO, who together receive around 50% of ECHO funding.

In developing policy and practice, Member States collaborate through COHAFA, whose role has been built as a result of the European Consensus on Humanitarian Aid. NGOs gather together various platforms at national and international levels for the purposes of exchange, common learning and advocacy. The VOICE network has a specific focus on EU humanitarian aid and brings together approximately half the ECHO partners.

THE EUROPEAN CONSENSUS ON HUMANITARIAN AID

The European Consensus on Humanitarian Aid represents a major milestone, defining the common objective, scope and principles of humanitarian aid of the European Union. Although not legally binding, the Consensus reflects the political commitment and common vision of Member States and the European Commission to adhere to best practice in their support for humanitarian aid. Former Commissioner Louis Michel explains the purpose as follows: *“Our aim is to restore respect for the principles of international humanitarian law and to ensure that relief aid, delivered effectively, rapidly and impartially by civilian professionals, reaches those who are most in need.”*⁴ It aims to improve the quality, coherence and effectiveness of EU humanitarian response.

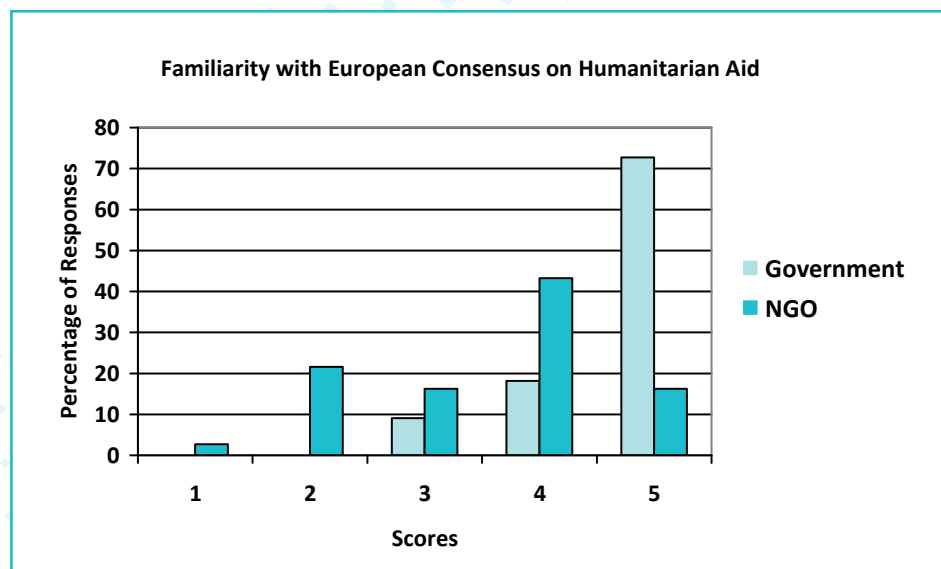
The Consensus is based on extensive consultations with Member States and humanitarian organisations, beginning in December 2006. These consultations served to identify common challenges in humanitarian action and led to the European Council, European Parliament and European Commission issuing a joint declaration, the European Consensus on Humanitarian Aid, which was signed by the Presidents of the three institutions in December 2007. The Consensus was the EU's first common policy framework on humanitarian aid.

Article 100 of the Consensus foresees the creation of an action plan to ensure the implementation of the Consensus. This action plan was developed by the European Commission in May 2008 and signed off by Member States later that year. A mid-term review of progress towards implementation of the Consensus was carried out in 2010 and, since 2011, annual progress reports are produced on the implementation of the Consensus. An evaluation of the 2008-2012 period of implementation was initiated in mid-2013.

⁴ Foreword to European Consensus published 2007.

1.1 AWARENESS OF THE CONSENSUS

The European Consensus on Humanitarian Aid has enormous potential both to guide Member States in their humanitarian decisions and to allow NGOs to hold Member States accountable in relation to the commitments the Consensus represents. Use of the Consensus for these purposes, however, depends on how well it is known by the stakeholders.



SURVEY QUESTION:

How familiar are you with the European Consensus on Humanitarian Aid?

The survey carried out for this review questioned respondents' acquaintance with the Consensus. Participating representatives of the humanitarian departments of Member States reported a high level of familiarity with the Consensus, with many scores of 5 ('completely familiar').

The application of the Consensus in the field is not covered in this study. However, NGOs reported that knowledge of the Consensus was much higher among their headquarters staff who, for example, receive information about it as part of their induction training, than it was among their field staff. One NGO representative who recently returned from a multi-year assignment in an African capital noted that he could have used the Consensus in his meetings with EU Embassies had he known of it, while others wondered if the document would be relevant at all at the field level.

The mixed level of awareness among NGOs about the Consensus is not surprising, given that this is a document to be implemented by Member States. NGOs have other codes and guidelines to adhere to, such as *'the Code of Conduct for The International Red Cross and Red Crescent Movement and NGOs in Disaster Relief'*. However, NGOs need to be familiar with the Consensus if they are to use it as a tool for dialogue and good practice with their governments on key humanitarian issues.

1.2 REFLECTION OF THE CONSENSUS IN MEMBER STATES' HUMANITARIAN POLICY DOCUMENTS

Member States report that the European Consensus is a very important policy document for them and nearly all include the Consensus in their humanitarian policies or strategies, although to varying degrees. It is important to highlight that 11 Member States have developed new humanitarian policies or strategies in the last three years, which is important as this is a first step in greater accountability from Member States towards their peers and citizens. At least 16 Member States refer explicitly to the Consensus in their policy documents.⁵

There are several examples of governments who make the Consensus a very prominent part of their policies:

CASE STUDY

- Finland repeatedly makes reference to the Consensus throughout its humanitarian policy document, affirming that, *"This policy is in line with the European Consensus on Humanitarian Aid,"* (Ministry of Foreign Affairs of Finland 2012).
- The corresponding Danish document states that *"Danish humanitarian policy is guided by the vision and principles embedded in the European Consensus on Humanitarian Aid,"* and later continues with *"European Consensus on Humanitarian Aid provides a common vision that guides the action of the EU, both at its Member States and Community levels. Denmark will work to strengthen EU coordination and promotion of best practice. There should be a particular focus on coherence of response strategies to a given crisis, and on working in partnership in the field. Denmark intends to take active part in the Council working group on Humanitarian Aid and Food Aid (COHAFA) and strengthen its dialogue with EU Member States and European Commission Humanitarian Aid Office (ECHO),"* (Ministry of Foreign Affairs of Denmark 2009).

Some Member States such as Italy and Latvia, however, mention the Consensus only in passing, referring to it together with other international policy frameworks or guidelines such as the Good Humanitarian Donorship (GHD) principles.⁶ An Italian NGO confirmed this point as they noted that, *"The government knows the GHD. I don't think the government knows about the Consensus and may not be aware of the content."* A conversation with a British NGO also reflects this picture, as the interviewee felt that, *"The Paris Declaration and GHD are important. Standards are taken very seriously. The UK is not proactive to mention the Consensus, but would agree with it."*

Government representatives participating in the survey report that the Consensus has greatly influenced their policy, although NGOs seem to disagree.⁷ When asked about the influence that the Consensus has had on Member States' policies and strategies compared to other international policy guidelines and frameworks, government representatives again emphasized the Consensus over other documents, whereas NGOs thought the Consensus had slightly less impact.

⁵ It was difficult to review policy documents for some Member States, such as Slovakia, Slovenia, Hungary, and Cyprus, given the limited amount of materials published in English, French or Spanish. Therefore, it is possible that the number of Member States making reference to the Consensus is even higher.

⁶ In 2003 representatives from donor governments and other stakeholders came together to discuss good humanitarian donorship. 23 principles were defined by the group to provide both a framework to guide humanitarian aid and a mechanism for encouraging greater donor accountability. These principles are the basis for the European Consensus on Humanitarian Aid. Therefore, it is not surprising that for Member States, the reference to the GHD principles and topics are the second most important topic in the Consensus after humanitarian principles.

⁷ In the survey question that asked about the degree to which the European Consensus had influenced government policies, with 1 representing "not at all" and 5 representing "completely", government representatives gave an average score of 4.2 while NGOs gave an average score of 3.1. See Annex 1 for a graphical representation.

Interestingly, NGOs in some countries feel that their government does not think it needs the Consensus: *"They don't want Brussels to tell them what to do. They would prefer to think that this document is more useful for India;"* or *"The government sees the EU Consensus largely as a policy tool for Member States that are new to the domain of humanitarian affairs."*

1.3 THE CONSENSUS AS A CENTRAL TOOL FOR A COMMON APPROACH TO EU HUMANITARIAN AID?

EU humanitarian aid is a shared competency in which the Consensus is a core common document. Member States discuss humanitarian aid policy and practice in the COHAFA Council Working Party, which is one of the elements of a strengthened humanitarian aid architecture resulting from the Consensus, as well as via bilateral exchanges with humanitarian partners.

WHAT IS THE COUNCIL WORKING PARTY ON HUMANITARIAN AID AND FOOD AID (COHAFA)?

Prior to meetings of the Council of the European Union, issues are discussed in technical working groups. The Council Working Party on Humanitarian Aid and Food Aid (COHAFA) brings together the representatives of Member States working on humanitarian issues. COHAFA serves as a forum where Member States can discuss humanitarian policy issues and the response of the European Union to different humanitarian crises.

The goals of COHAFA include promoting the Consensus, improving coordination among Member States in humanitarian action, as well as improving the transition from humanitarian to development assistance. The creation of COHAFA represents the fulfilment of one of the points included in the Consensus Action Plan. It is an important forum for NGOs and other practitioners to engage with, in order to demonstrate the reality in the field and the impact of EU policy choices on that field reality.

While, as above, Member States agree on the importance of the Consensus to humanitarian aid policy, the policy documents only have as much value as the degree to which they are used and implemented. One government felt that the Consensus could be used even more within COHAFA to engage in strategic discussions. For another government, the Consensus was useful in explaining humanitarian action to non-humanitarian colleagues within the ministry.

To the question *'Are there aspects of the European Consensus you feel require greater attention from the government?'* Member States most frequently responded that there are no areas in need of greater attention. The areas of the Consensus that NGOs feel need greater attention from Member States are very much in line with the issues NGOs consider the most important. The continued insistence on humanitarian principles from NGOs indicates that they see a gap between the emphasis on humanitarian principles at the policy level and Member States' actual implementation of these policies, which will be further discussed in this report.

In terms of implementation of the EU Consensus, the signing of the Consensus was followed by the creation of a five-year Action Plan in 2008, which underwent a mid-term review in 2010 to assess the progress of its implementation (European Commission 2010). Since 2011, there have also been annual reports on the implementation. These reports provide a snapshot of Member States' and ECHO's humanitarian activities as falling within the framework of the Consensus. What is missing from the annual reports is an analysis of the degree to which these activities actually advance the Consensus. Moreover, many Member States have not given input to the author of this report (DG ECHO), leading to a major donor such as the UK not being reflected in the 2011 report at all. Other Member States have also missed opportunities to share information, for example Germany decided internally to prioritise four elements in the Consensus action plan, but did not communicate publicly which ones.⁸

Closely linked to the issue on implementation is the question of compliance with the Consensus. Although the Consensus is a legally non-binding instrument, the EU-wide constituency that the Consensus brought together – the instrument was jointly agreed by the Council, Parliament and Commission – suggests that it has a robust authority in guiding Member States' policies and practices. In a sense, Article 214 of the Lisbon Treaty covering humanitarian aid, which came into force later, is legally more significant as it is binding law, but it may carry less moral weight than the Consensus.

In summary, while Member States are more familiar with the Consensus than NGOs, this is somewhat to be expected as the document is addressed to and signed by them. In many instances, Member States' appreciation of the Consensus has translated into their humanitarian policy documents, as most make reference to it. The key question relates to the implementation of and compliance with the Consensus. As discussed later, NGOs see a gap between the rhetoric and actual practice, and agree that they could do more to monitor Member States' application of the Consensus.

⁸ As reported at Workshop on Evaluation of Action Plan Consensus, July 2013.

2. HUMANITARIAN PRINCIPLES

When asked to highlight most significant components of the Consensus Member States and NGOs both named the area of humanitarian principles. Humanitarian principles lie at the heart of humanitarian action and without them, humanitarian action can quickly become absorbed by other types of social or technical assistance to the point where it loses its meaning. The principles, as defined in the Consensus, are:

- *Humanity: human suffering must be addressed wherever it is found, with particular attention to the most vulnerable in the population. The dignity of all victims must be respected and protected.*
- *Neutrality: humanitarian aid must not favour any side in an armed conflict or other dispute.*
- *Impartiality: humanitarian aid must be provided solely on the basis of need, without discrimination between or within affected populations.*
- *Independence: autonomy of humanitarian objectives from political, economic, military or other objectives, and serves to ensure that the sole purpose of humanitarian aid remains to relieve and prevent the suffering of victims of humanitarian crises.*

Adhering to these principles is not merely a lofty theoretical exercise but actually translates into operational effectiveness and acceptance of humanitarian action in the longer term. Local perceptions of an organisation's intention to assist civilians based solely on need, regardless of other factors, and without pursuing political, economic, security or military agendas, are what allows organisations to access those in need. When organisations begin to pay less attention to humanitarian principles, or when non-humanitarian actors with other agendas claim to do humanitarian work, access may be limited, perceptions may get blurred, and the safety of humanitarian workers can be put at risk.

As a network of European humanitarian NGOs, VOICE strongly supports humanitarian principles. Given the importance that NGOs place on abiding by humanitarian principles, it makes sense that they are primarily using the Consensus to advocate for the application of the principles. The principles, however, are not unique to the Consensus; as noted, they form the foundation of humanitarian action and are therefore present in numerous policy guidelines. As one interviewee put it, *"The humanitarian principles are most commonly used, but they are everywhere."*

The EU and its Member States express a high level of commitment to humanitarian principles. The Consensus says:

The EU is firmly committed to upholding and promoting the fundamental humanitarian principles of humanity, neutrality, impartiality and independence. This principled approach is essential to the acceptance and ability of the EU, and humanitarian actors in general, to operate on the ground in often complex political and security contexts. The perception of the EU and its commitment to these fundamental principles in humanitarian action are linked to behaviour and engagement on the ground of all EU actors.⁹

⁹ European Consensus on Humanitarian Aid, article 10

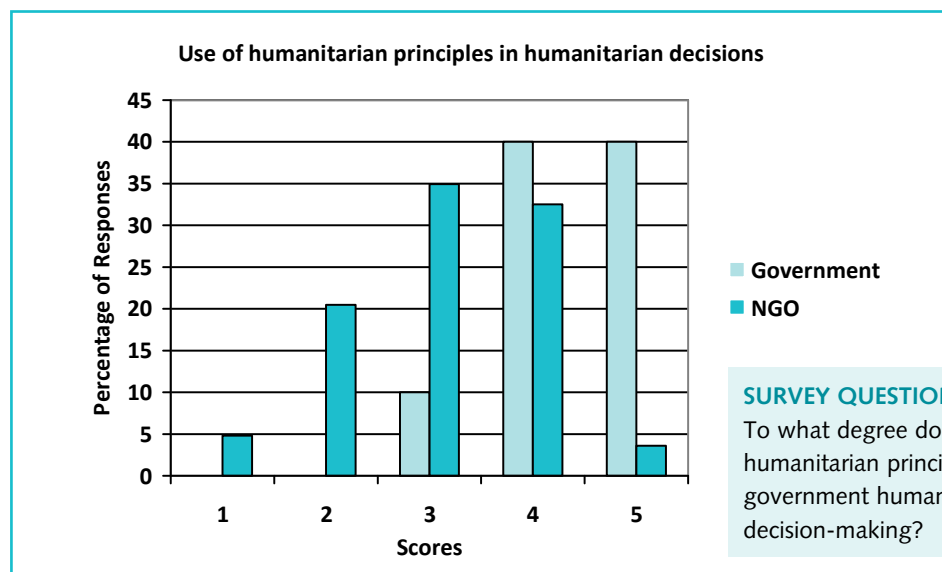
Similarly, Member States' humanitarian policies and strategies very much refer to humanitarian principles, even if the degree of detail and emphasis may vary from one country to another:

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- France, for example, explains how humanitarian principles are important for humanitarian actors to be able to operate in difficult contexts (Ministry of Foreign Affairs of France 2012).
- Germany reports “*unconditional adherence*” to humanitarian principles (Federal Foreign Office for Humanitarian Assistance Abroad of Germany 2012).
- Denmark’s humanitarian strategy defines each humanitarian principle, and considers them “*guiding principles for Denmark’s humanitarian action,*” making reference to both the Consensus and the GHD Principles (Ministry of Foreign Affairs of Denmark, DANIDA 2009).
- Finland does not define each principle, but states that “*The provision of assistance is based on the humanitarian principles of humanity, impartiality, neutrality and independence. Finland provides humanitarian assistance solely on the basis of need, not on political, military or economic motivations. Independence, impartiality and neutrality are basic pre-conditions for humanitarian agencies to reach the people who need assistance and for the safety of aid workers,*” (Ministry for Foreign Affairs of Finland 2012).

2.1 PUTTING HUMANITARIAN PRINCIPLES INTO PRACTICE

Perceptions of how Member States' practices follow humanitarian principles are another story. The survey carried out for this study reveals a fairly significant difference in the perceptions of government representatives and NGOs regarding the extent to which humanitarian principles actually guide the decision-making of donors. Survey participants from government humanitarian departments gave a much higher score for this compared to NGOs.



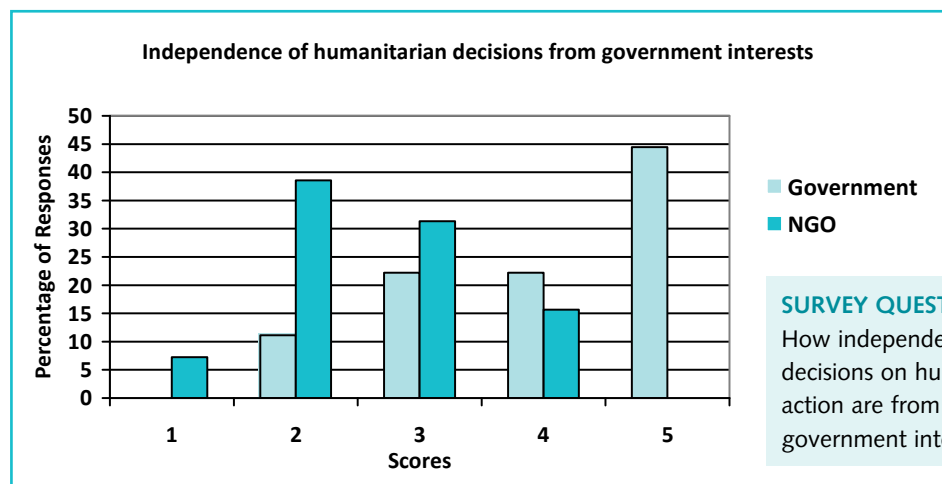
Focus groups provided greater insight into the reason behind this lower score, providing cases to illustrate the NGOs' perspective. Italian NGOs, for example, felt that their government inappropriately extended the application of the legal decree for peacekeeping to humanitarian aid, politicising humanitarian aid and breaching humanitarian principles. The 2009 OECD/DAC Peer Review indeed encouraged Italy to develop a new legislative framework, as its Law 49/1987 states that humanitarian action is part of the country's foreign policy.

A few NGOs questioned whether humanitarian decisions were truly needs-based, as both Dutch and Czech NGOs reported that humanitarian funding tends to go more to countries that are also development partners, even though the Netherlands calls for *"need-based and demand-driven"* humanitarian aid (Ministry of Foreign Affairs of the Netherlands 2012), as does the Czech Republic, which notes that *"HA [humanitarian aid] is provided strictly on the basis of needs"* (Ministry of Foreign Affairs of the Czech Republic 2013).

The UK's humanitarian policy highlights that *"UK humanitarian action will be based on need, and need alone"* (DFID 2011). British NGOs stressed, however, that the attention to humanitarian principles varies depending on the leadership of the department. Some valued that steps had been taken to attempt to protect humanitarian action from political interventions. Overall, however, the NGOs see their government's humanitarian funding as being largely linked to the country's political strategy and not driven by DFID.

In other countries, NGOs also repeatedly expressed concern over the level to which political priorities influence or even determine decisions around what, where and who to fund. This clearly contradicts the Consensus, which states that *"EU humanitarian aid is not a crisis management tool"*. Many focus group participants gave examples of political interests interfering in humanitarian action. Some stressed the tendency for foreign ministries to fund crises with significant media coverage, or in countries designated as development partners. The speed with which governments respond to a crisis was also affected by the political agenda. NGOs in France shared this view, indicating that humanitarian needs are almost exclusively addressed in countries that fit into the political strategy, or those with extensive media coverage. *"Don't waste your time discussing and trying to raise funds for forgotten crises with them,"* reported one NGO, a sentiment echoed by Spanish NGOs. NGOs in Germany and Spain also criticised the tendency of their foreign ministries to combine humanitarian issues with political objectives, specifying examples of Libya, Syria and Mali. Similarly, a Swedish NGO stated that *"Political implications are considered more important than humanitarian need"* - a feeling repeated by Belgian, Italian and Austrian NGOs.

This view was reflected in the survey, in which a significant number of responses indicated concern over funding that is based on political or diplomatic factors, and which respondents cited as examples of poor practice. The interference with the humanitarian agenda from the political side of governments is



seen as problematic, especially in high profile crises when Ministers want their constituents to see them taking action. A significant number of survey responses stressed that one of the most important aspects of the Consensus was its focus on needs-based funding. However, the NGO perception is that funding is often linked to non-humanitarian considerations.

In part, this could be attributed to a lack of familiarity with humanitarian principles among non-humanitarian government bodies, such as those covering foreign affairs, defence, trade, and even departments focused exclusively on development. Here again, NGOs were more critical than government representatives. British NGOs considered that politicians in general, similar to the general public, do not know enough about humanitarian action. For Italian NGOs, the problem lies with the Ministry of Foreign Affairs placing people with little to no humanitarian experience in charge of the emergency office, and then rotating them frequently - not allowing for learning, and reducing the incentive for NGOs to invest in the relationship.

However, feedback from NGOs shows that they notice and appreciate the humanitarian departments' efforts to defend humanitarian action from other government interests. Dutch NGOs, for example, praised the humanitarian department's work to protect the non-political character of humanitarian response and its warning of the risks of politicization. Many consider, however, that more powerful government interests tend to outweigh humanitarian departments' efforts. This sentiment was echoed by Spanish NGOs, who felt that the humanitarian department strived to defend humanitarian principles, but had limited power to do so in relation to the Ministry of Foreign Affairs. German NGOs complained that the political side of the Ministry of Foreign Affairs only shows interest in humanitarian action when it can be used as a public relations tool to soften foreign policy positions. Given this reportedly limited interest, they saw minimal influences from political interests in humanitarian affairs, with a few exceptions - most notably when the Ministry pushed NGOs to work in areas where German troops were deployed in Afghanistan. This raises the question of whether advocating for political attention to humanitarian response could actually create a greater risk of politicising humanitarian response.

When asked to provide examples of good practice from Member States, the most common response was also related to need-based response and support for humanitarian principles. For instance, German NGOs pointed to their government's financial support for humanitarian response in the Central African Republic, which is a situation not relevant to German foreign politics. A British NGO praised DFID for requesting sex and age-disaggregated data as a means to improved need-based humanitarian response. Several Irish NGOs praised the Department of Foreign Affairs for vocalising government commitment to humanitarian aid, for taking strong positions within COHAFA and for pushing NGOs to adhere to humanitarian principles.

In summary, for both Member States and NGOs, humanitarian principles are the most important part of the Consensus. Humanitarian principles are very much present in Member States' humanitarian policies. NGOs recognise that the humanitarian departments of their governments make an effort to defend humanitarian principles in government decisions- but not always with success.

However, NGOs are critical of the application in practice of the humanitarian principles and expressed concern over the independence of humanitarian decisions from other government priorities (political, economic, military, etc). Participating Member States report that their non-humanitarian colleagues in government are not sufficiently familiar with humanitarian principles, but overall they are not particularly concerned about this gap affecting actual humanitarian decisions. NGOs do see this as an issue that needs more attention.

2.2 PROMOTING HUMANITARIAN PRINCIPLES IN CIVIL-MILITARY RELATIONS

An important component related to humanitarian principles is the relationship between civilians and the military, especially in the field. The Consensus provides a clear framework for that, stating: *“The use of civil protection resources and military assets in response to humanitarian situations must be in line with the Guidelines on the Use of Military and Civil Defence Assets in complex emergencies and the Oslo Guidelines on the Use of Military and Civil Defence Assets in International Disaster Relief, in particular to safeguard compliance with the humanitarian principles of neutrality, humanity, impartiality and independence.”* Blurring the lines between the role of humanitarian organisations and the military impedes humanitarian actors' access to those in need and could create potentially dangerous situations for them. For example, if both the international military and humanitarian NGOs provide health and nutrition services, as was the case in Afghanistan, confusion is sown as to what extent humanitarian actors are affiliated with the military, impacting on perceived neutrality. This is an issue of great importance for VOICE members, who developed a set of operational recommendations for the EU, such as ensuring that the military are clearly identified, and that military activities should never be labelled as humanitarian action (VOICE 2009).

Over recent years, many Member States have recognised the need to pay attention to this issue. There are some clear examples of Member States integrating these concepts into their policies.

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- The UK's humanitarian policy acknowledges that *“Maintaining humanitarian space is particularly important when military and civil defence assets are deployed in support of humanitarian assistance efforts. Access may be compromised when humanitarian aid is perceived to be linked to political or military goals; this risk needs to be avoided,”* (DFID 2011).
- Sweden dedicates significant portions of its policy to this topic, emphasizing that *“Humanitarian organisations should always maintain a clear division of roles between themselves as civilians on the one hand and armed groups and other parties to the conflict on the other. This approach is particularly important in areas where military forces operate,”* (Department for Development Policy and the Ministry for Foreign Affairs of Sweden 2010).
- Germany sets clear conditions on when military assets should be used: *“Military assets and capabilities may only be deployed to support humanitarian measures if this is the last resort, that is to say if civilian assets and capabilities are not a comparable alternative and only the deployment of military assets, which are unique with regard to their capabilities and availability, can ensure that urgently needed humanitarian assistance is provided. In such cases, military assets are deployed in line with the (...) MCDA Guidelines and the (...) Oslo Guidelines”* (Federal Foreign Office for Humanitarian Assistance Abroad of Germany 2012).

In order for such stated policy goals to become a reality, the military needs to understand what humanitarian action is and what the boundaries are. Therefore, some Member States work to foster this understanding by creating opportunities for dialogue between humanitarian organisations and the military.

Of the survey participants, 48% reported that this exists in their country, 28% reported that it does not exist and the remainder were unsure. That said, respondents from the same country often disagreed regarding their existence or not, which indicates that the dialogues are not widely known, or occur infrequently. In the UK, NGOs reported that the contact group between NGOs and the military had created a useful channel for discussion. In Denmark and Germany, the Ministry of Defence participates in the regular coordination meetings between NGOs and the Ministry of Foreign Affairs. Such participation is likely to improve the knowledge of the military on the specificities of humanitarian action, and which kinds of actions hamper rather than assist relief efforts. According to NGOs it is much less certain, however, that these contacts and exchanges will keep the military out of aid delivery, as mandates of military missions are determined by politicians. Once deployed in a humanitarian setting, dialogue, and where possible coordination, is to be upheld by civil-military liaison officers of the military and the humanitarian community; the latter is usually done by UNOCHA, on behalf of the entire humanitarian community.

In situations where military deployment of a Member State coincides with funding to humanitarian action, about half of the survey participants reported that the government does not put limitations on activities of humanitarian actors as a condition for funding. When conditions were applied, the most common example given was the need to work in places with troop presence. This issue has been fervently debated in Germany, but it has also been a bone of contention in other countries. For example, a Danish NGO reported, *"strong pressure on NGOs to coordinate through Provincial Reconstruction Teams in Afghanistan, and to be operational in the same areas as Danish troops."* A Dutch NGO reported, *"In Afghanistan, the presence of the army possibly restricts the work of NGOs, as the NGOs are linked to the army in perception, due to shared nationality."* Similarly, an Italian NGO felt pressure from the military to coordinate risk management.

One French NGO criticized the government for using humanitarian needs as an excuse for military intervention seeking regime change in Libya, and joined other NGOs who cautioned of the impact of labelling this type of intervention as 'humanitarian'. Moreover, several French NGOs reported that they chose not to accept funds from the government to work in Mali, in order to safeguard and demonstrate their independence of the wide political agenda of their government in the country.

To summarise - there is recognition by Member States of the importance of questions of humanitarian-military interaction, and good examples of corresponding integration into policy. As a result, some Member States work to support mutual understanding by creating opportunities for dialogue between humanitarian organisations and the military. Such participation is likely to improve the knowledge of the military on the specificities of humanitarian action. However, NGOs are less certain that these contacts and exchanges will keep the military out of aid delivery, as mandates of military missions are determined by politicians. This concern has been illustrated by some cases of gap between policy and practice.

3. COORDINATION AMONG HUMANITARIAN STAKEHOLDERS IN EU MEMBER STATES

Coordination between Member States and NGOs on humanitarian policy and practice at the national level is critical to ensure that the humanitarian principles and other elements of the Consensus are respected and implemented. NGOs and Member States generally agree regarding the level of engagement they have with each other, giving similar average scores to this survey question (3.71 from governments and 3.76 from NGOs). NGOs seem to feel that the humanitarian departments of their governments are highly accessible. British NGOs described the government as “very approachable”, Spanish NGOs consider the government “fairly open. We don’t have problems meeting with them,” and Danish NGOs report that “it is very easy to get in touch with them.” In the Czech Republic, the humanitarian community is small, with only four humanitarian NGOs and one government person in charge of humanitarian affairs, resulting in a very open relationship.

Approximately 80% of both Member States and NGOs participating in the survey stated there was a recognized forum for dialogue between the government and NGOs. However, NGOs in several countries missed more systematic coordination. Italian NGOs and the Italian government agree that this is lacking and refer to the GHD work plan, which makes reference to the establishment of a formal mechanism for coordination, the National Consultative Committee on Emergency and Humanitarian Aid, which will include NGOs, the Red Cross, the military, civil protection and local authorities. However, Italian NGOs seemed doubtful of its usefulness: “The only coordination attempt by the Emergency Office was an open table basically with anyone who wanted to come.” They were more positive regarding the engagement in the field to discuss strategy, but of course there should also be parallel coordination at headquarters level. Czech NGOs would also like to see more follow-up at the field level from the government, but did not know how realistic this would be, given the small size of the humanitarian department. Denmark has attempted to have its embassies play a larger role in this regard, but Danish NGOs were divided on its usefulness, as success depends on whether the embassy staff in each country understands humanitarian issues. Spanish NGOs reported that “Meetings with the government are more ad hoc, around crises. There is no coordinated relationship and there is no calendar of meetings.”

Planned coordination does not necessarily mean quality of dialogue and/or collaboration. Danish NGOs report that despite having an annual meeting at the leadership level with the Ministry, it is not strategic and tends to focus on technical or contractual issues, a view echoed by the Ministry. Opportunities deriving from Denmark’s active role at the international level, where it has taken a number of positions in chairing forums in the past years, should be used more frequently. The Caritas presentation to COHAFA of its report on the implementation of the European Consensus, ‘Bridging the Gap Between Policy and Practice’, during Denmark’s presidency of the European Union is one example of this (Caritas Europa 2011).

German NGOs have an established coordination forum with the government, but also report that the quality of this coordination varies. They partially attribute this to the change in participating individuals from the German government, but also to their own investment in the forum. Dutch NGOs report that coming together as a group has improved the quality of the dialogue, demonstrating to the Ministry that they have the capacity to coordinate. They have since been recognized as a serious

interlocutor, whose advocacy efforts have led to the creation of a new fund for protracted crises that NGOs will be able to access.

In some countries, such as the UK and Italy, there is no shortage of NGO coordination bodies. In those cases, the question may be raised if the multiple bodies increase or dilute the influence that NGOs have with the government. In addition, NGOs in several countries admitted that the dialogue with the government can be hampered because of competition for funding between NGOs and donor pressure for results, limiting the opportunities for open conversation and real strategizing on issues of common interest.

In many countries, coordination forums with government agencies have been useful for NGOs to raise issues of concern and strive to influence government humanitarian policies and strategies. There are several examples of NGOs influencing government policy in Member States via these mechanisms. In the Netherlands, for example, one NGO reported that the NGO community had been *"pushing a lot, even through Parliament. As a result, a policy was made with some participation of NGOs and now the relationship is improving."* NGOs in Germany, the Czech Republic, and also to a more limited extent in Spain, described similar experiences. Spanish NGOs reported that the government had already developed their strategy, and consulted with them afterwards, using their feedback and analysis to improve it. According to the survey, 42% of participants from governments report engaging with NGOs to discuss their policies and strategies, ranking the engagement with a score of 5 out of 5. NGOs were only slightly less positive, with 42% of the participants giving a score of 4 out of 5.

In conclusion, NGOS find their governments relatively accessible and in many countries meet quite regularly with humanitarian officials in coordination forums. Such forums with government agencies have been useful for NGOs to raise issues of concern and strive to influence government humanitarian policies and strategies. However, both NGOs and Member States agree that these encounters are not being used to their full potential to discuss strategic humanitarian issues. While having a meaningful dialogue seems to depend heavily on the individuals involved, a more systematic coordination could be useful.

4. LIMITED GOVERNMENT FUNDING TO NGOS

For NGOs, the next most important component of the Consensus, after humanitarian principles, relates to the added value of NGOs and civil society as humanitarian actors, which the Consensus refers to in the following way: *“Non-Governmental Organisations (NGOs) are essential to the humanitarian response as they deliver the majority of international humanitarian aid due to their field-presence and flexibility, often with a high-level of specialisation. They are also a direct expression of active citizenship at the service of the humanitarian cause¹⁰.”* VOICE shares this view and goes further by articulating the added value of NGOs as including (among others) their flexibility, expertise, partnership with national and local civil society and role in advocacy¹¹.

The understanding of the Consensus is that best practice in humanitarian action requires cooperation between donors and international and local partners. Diversity and quality in partnership is a key element of the Consensus, which states that *“The EU should underline its intrinsic support for a plurality of implementing Partners-the NGOs, the UN and the Red Cross Movement- and acknowledges that each has comparative advantages in responding to certain situations or circumstances¹².”*

Funding to NGOs, then, is a good way to measure how Member States view NGOs' importance in providing humanitarian assistance and the importance of diversity in partnerships, not only in terms of policy consultations but also in practice. Despite the fact that NGOs shared positive views on the level of engagement with their governments at the policy level, an important distinction needs to be made in how governments relate to NGOs when the issue turns to funding.

Overall, participating governments value UN agencies the most as partners, followed by the Red Cross/Red Crescent Movement, other international organisations, and finally NGOs. It is not a new finding that EU Member States tend to give the majority of their humanitarian funding to the UN, while the percentage apportioned directly to NGOs is in fact quite small (although some NGOs will also receive funding via UN channels). Justifying their preference for the UN, some governments pointed to the coordination role that UN agencies play. They also noted that NGOs are not able to respond at the same large scale as UN agencies. Their own lack of capacity to manage grants, including many small ones, to a multiplicity of actors was cited as another reason for channelling humanitarian funds through the UN.

In various focus group sessions and interviews with NGOs, participants explained that it was easier for Member States to meet funding targets by simply writing big cheques to UN agencies, and that block funding seemed more efficient to these humanitarian departments, especially in the light of administrative requirements. Politically, funding to the UN is also a way to buy international influence. Many NGOs see a clear political decision in the disproportionate amount of funding that goes to the UN in order to gain more influence internationally. This view was expressed among VOICE members in Spain, for example, who felt that their government gave more funding to the UN due to their interest in being elected for a non-permanent seat in the Security Council. In general, NGOs criticised the support that their governments give to the UN as being both political and based on a perhaps idealised notion of how the UN functions.

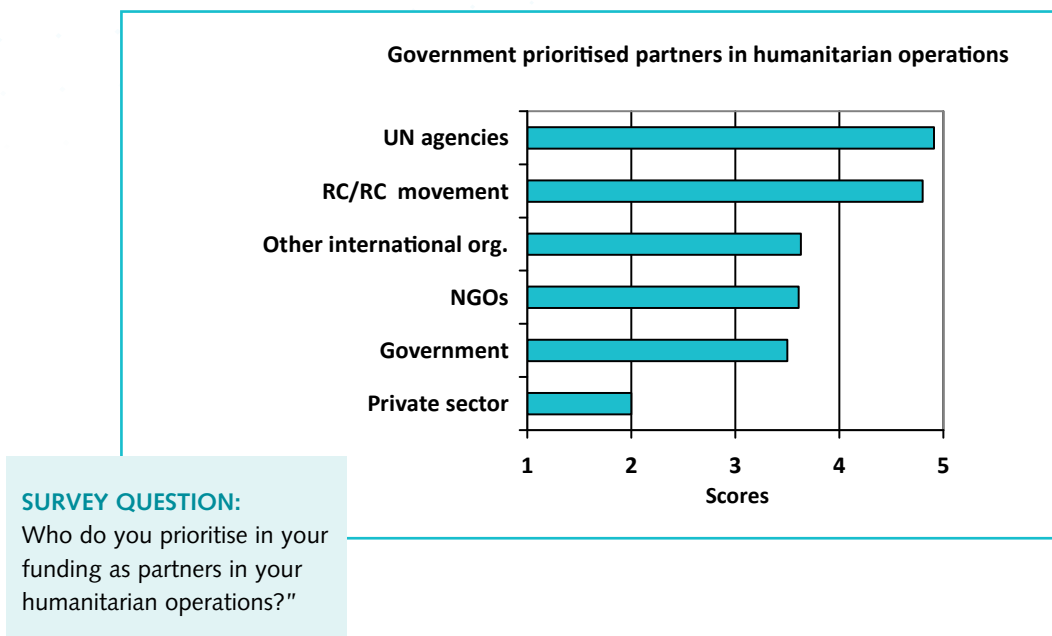
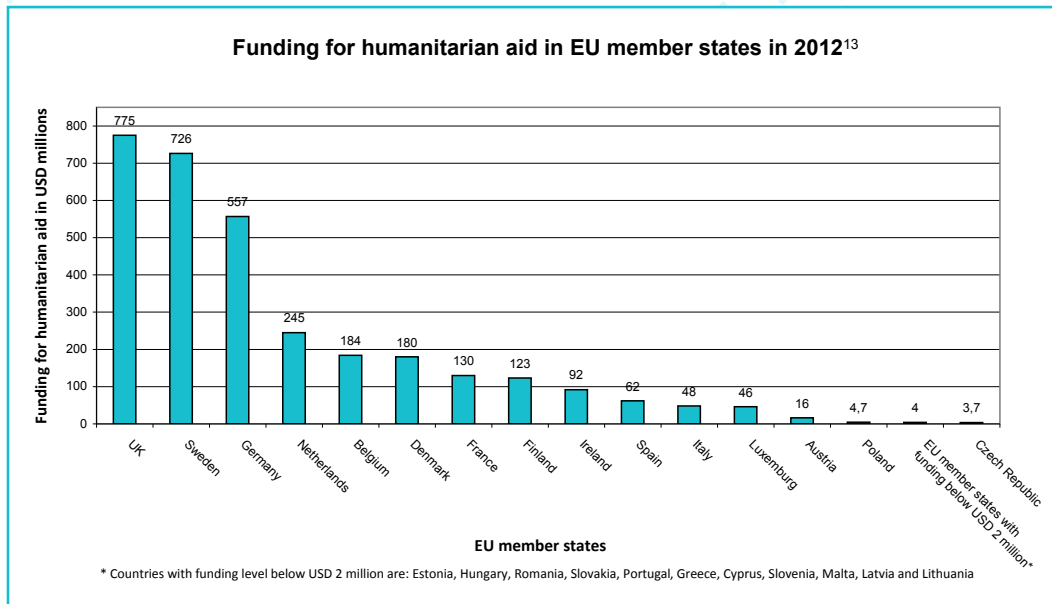
One assumption of governments is, of course, that a significant percentage of the funding that is provided to the UN will eventually be allocated to NGOs. Despite the fact that UN agencies are

¹⁰ European Consensus on Humanitarian Aid, Article 49.

¹¹ VOICE GA Policy Resolution May 2012 “What Humanitarian NGOs are all about”.

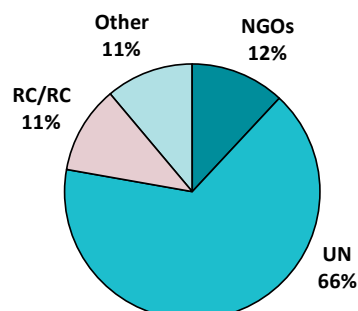
¹² European Consensus on Humanitarian Aid, Article 50.

the primary recipients of donor funding, they are highly dependent on NGOs for the delivery of aid. There are two considerations, however, that should be of concern to both donor governments and NGOs. First, funds to the UN, including the pooled funds, see cascading overhead costs from one agency to another, which imply that a significant percentage of the funds is not spent on operations but on maintaining expensive bureaucracies in place. And, second, expecting NGOs to become the UN's implementing partners may not always be the best guarantee for principled humanitarian action. Especially in conflict situations, the UN has many roles to play, other than just a humanitarian one. As a result, it may have difficulty in remaining neutral and impartial and associating too closely to the UN could have security or access implications for NGOs in these cases.



¹³ It is important to note that the desk review of donor funding revealed discrepancies between national reports and data reported to the Financial Tracking Service (FTS), despite the commitment included in Article 72 of the Consensus: "To ensure that resources follow needs and to help reinforce accountability, it is important that all donors report their humanitarian aid contributions to the UN OCHA managed Financial Tracking Service." It is difficult to ignore the irony of the heavy administrative requirements of some donors on the one hand, and their limited transparency in reporting to FTS on the other.

Average EU humanitarian funding 2012

Member States' humanitarian funding by type organisation in 2012¹⁴

	UK	Sweden	Germany	Netherlands	Belgium	Denmark	France	Finland
NGOs	10%	12%	26%	4%	4%	28%	13%	10%
UN	82%	70%	56%	75%	54%	61%	53%	74%
RC/RC	5%	15%	11%	22%	15%	11%	16%	16%
Other	4%	3%	7%	0%	26%	0%	18%	0%
Total funding in 2012	781 M\$	726 M\$	552 M\$	244 M\$	183 M\$	180 M\$	130 M\$	123 M\$

	Ireland	Spain	Luxembourg	Italy	Austria	Poland	Czech Rep.	Estonia
NGOs	30%	12%	20%	0%*	22%	20%	51%	0%
UN	52%	70%	51%	74%	53%	62%	32%	84%
RC/RC	17%	12%	22%	3%	16%	15%	9%	16%
Other	1%	6%	7%	22%	9%	2%	9%	0%
Total funding in 2012	92 M\$	62 M\$	45 M\$	48 M\$	16 M\$	4,69 M\$	3,72 M\$	1,25 M\$

	Hungary	Romania	Slovakia	Portugal	Greece	Cyprus	Slovenia	Latvia	Lithuania
NGOs	1%	33%	0%	0%	0%	0%	0%	0%	0%
UN	55%	51%	15%	100%	74%	100%	100%	100%	60%
RC/RC	26%	0%	0%	0%	26%	0%	0%	0%	0%
Other	18%	16%	85%	0%	0%	0%	0%	0%	40%
Total funding in 2012	1,19 M\$	397 131 \$	288 727 \$	0,26 M\$	258 630 \$	129 198 \$	88 999 \$	55 844 \$	45 972 \$

Source: FTS

*Italian government report providing funding to NGOs, which Italian NGOs confirmed. However, this is not reflected in reporting to FTS.

Some examples from Member States clearly illustrate this discrepancy between positive relations with NGOs on the one hand and very limited funding on the other.

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- An important case in point is the Netherlands. While the relationship between NGOs and the government was considered to be constructive with regard to the quality of policy dialogue, this stands in sharp contrast to the actual financial support that Dutch NGOs receive from the government. According to DARA's figures, in 2012 only 4% of the Netherlands' total budget for emergency relief was allocated to NGOs directly.
- The situation in Finland is also less than exemplary with a very low percentage of funding given to NGOs (10%), and instead a significant amount of aid (75%) allocated to the UN system (FTS 2013).
- France presents an unusual case for EU donors. In 2010-2012 it reported that almost 10% of its humanitarian budget was dedicated to bilateral (government to government) funding; perhaps a different interpretation of diversity in partnerships.

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¹⁴ When reading this, it should be kept in mind that there are countries that have a long tradition of collaboration with NGOs, while in the EU new Member States, but also in some southern countries, civil society is much younger.

... CASE STUDY

■ There are some exceptions worth noting, however. Denmark, which has a similar size NGO community to the Netherlands, appears to be a strong supporter of its NGOs. According to the Financial Tracking Service (FTS), Denmark gave \$51 million to NGOs, or 28% of humanitarian funding in 2012. As part of its 2010-2015 policy document, Denmark decided to build special partnerships with a reduced number of strategic partners. It has limited its humanitarian funding to seven NGOs which have a partnership framework agreement. The case of the Czech Republic also offers an interesting exception. In its last annual strategic plan there is specific recognition of the role of Red Cross/Red Crescent and the UN, but not of NGOs (Ministry of Foreign Affairs of the Czech Republic 2013). However, this apparent lack of interest in the value of NGOs stands in contrast with actual funding allocations, with an average of 57% of the budget going to NGOs between 2010-2013 according to FTS data. Even if the budget is quite small (around 1.47 million euro/year), it nonetheless represents one of the highest funding percentages among EU Member States. The Czech Republic also offers an example of good practice in the area of transparency. The government's annual reports give a comprehensive and detailed overview of the government's funding, a practice that appears to be an exception among EU Member States. NGOs confirmed that the government's humanitarian funding was very important to them, for being timely, flexible, transparent and reliable, even if the total figure was not huge.

Two main conclusions can be drawn related to Member States' funding of NGOs: firstly, positive and open relationships do not necessarily translate into actual funding. Because of the reduced percentages of humanitarian funding going to NGOs (as opposed to the UN or International Organisations) in several Member States, the emerging picture is that ECHO has become an essential donor for the humanitarian operations of a number of NGOs.

Secondly, a number of Member States continue overwhelmingly to favour UN agencies when assigning their humanitarian budgets. This distribution of funds does not reflect the comparative advantages and the proportion of aid delivered by NGOs. The Consensus notes that NGOs are essential to humanitarian response as they deliver the majority of international humanitarian aid due to their field presence, flexibility and specialisation. NGOs feel that this reality needs to be better reflected in donor decision making.

The Consensus article 50 states that due to different comparative advantages, the EU should support NGOs, UN and Red Cross Movement. In the NGO sector, comparative advantages are cited to include field-presence, flexibility and specialisation (article 49). Restrictions on funding to non-NGO actors or limitations via a small number of framework partnership agreements can put the expression of these comparative advantages at risk. At the same time, addressing the concerns held by a number of Member States about the capacity of NGOs to absorb large funds is an ongoing challenge for NGOs.

5. ADMINISTRATIVE REQUIREMENTS: AN EXCESSIVE BURDEN?

Article 52 of the Consensus calls for all EU donors to *“maximise the opportunity for flexibility within their systems and streamline procedures to the extent possible in order to reduce the administrative burden on implementing organisations, whilst ensuring quality in partnership and strong accountability in aid delivery.”*

The administrative burden related to managing funds from EU donors is a significant concern for NGOs. This applies throughout the project management process including proposal, project implementation, procurement, reporting and audit. In recent years, the emphasis on value for money in several Member States with its focus on results has also contributed to ever-changing demands for information and the impression that there is generally more scrutiny on NGOs.

The focus on results-based management may also have other important implications. As one NGO put it, *“Even though the policy is good regarding principles, in practice, principles are not being prioritised due to the focus on value for money. Results come before principles.”*

Interestingly, British NGOs seemed not to share the view of other countries that the UK is a leader in promoting value for money in humanitarian practice. NGOs noted that there is massive variability within DFID and the fact that there are *“lots of former NGO people working for DFID as well”* seems to play a role. Such people know how complicated this concept is in practice, especially in a humanitarian context.

NGOs repeatedly noted that Member States have considerably more stringent administrative requirements for NGOs compared to UN agencies.

According to the survey, Member States considered to have the most burdensome administrative requirements are Spain, Belgium, Italy and, to a slightly lesser degree, Ireland. Member States considered more flexible are France and Austria. When asked if the administrative requirements should be reduced, not surprisingly 57% of NGO participants felt that they should be reduced, compared to only 36% of government representatives.

In the NGO focus groups, this topic provoked strong responses in several countries, who expressed their frustration with the way their governments handled the administrative requirements.

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- Italian NGOs highlighted the signing of contracts as excessively slow, as they require the signature of ambassadors or the political bureau, as well as multiple bank guarantees. The proposal process and reporting, however, were considered more straightforward.
- In Spain, NGOs were highly critical of the contradiction between the flexible framework agreements with humanitarian NGOs, which allow for a rapid response, and the administrative requirements for the financial reporting afterwards. They all emphasised that several staff people were required to justify the expenses: *"Spain is worse than ECHO because ECHO really supports you and even though they ask for a lot, what they ask for makes sense. Here we have a funding instrument that was made for development and the humanitarian office doesn't have the power to change this."* They also spoke of multiple audits by auditors who do not understand the operational contexts of humanitarian action and, in some cases, court cases to justify expenses four years afterwards, making it very complicated to track.
- British NGOs considered reporting to be increasingly burdensome, including requirements for output/cost comparisons. Meanwhile, procurement requirements were considered flexible.
- German NGOs perceived their government to be relatively flexible overall, but reported that staff came back too frequently to the NGOs with questions on minor, technical issues.
- French NGOs, on the other hand, stressed how simple the government's administrative requirements were, as did Czech NGOs, who added that they would like to see more oversight.

Working with multiple donors who have very different reporting requirements understandably increases the overall administrative burden on any one NGO. It is worth mentioning that Belgium is the first Member State to have adopted the use of ECHO project application and reporting formats, a potentially positive step in terms of donor harmonisation, although many NGOs consider ECHO's administrative requirements highly burdensome.¹⁵

The increased emphasis on accountability related to the spending of public funds over recent years is perceived by humanitarian NGOs to have led to the need for increasing quantities of information. While there is a strong focus on 'top-down' accountability among many Member States, the Consensus also makes reference to accountability to affected populations (article 43). While this is an important theme for many NGOs, so far this seems to receive much less attention from Member States.

In conclusion, despite the Consensus promoting the reduction of administrative requirements on partners, many NGOs report that this has not been the case. It must be noted that there are diverging practices among the Member States. These differences beg the questions: what should be seen as an appropriate balance between administrative requirements and flexibility and at what point do administration requirements start hampering the effectiveness of humanitarian operations and the efficient use of resources?

¹⁵ ECHO is aware of this common complaint from NGOs and is working to address it to the extent possible through a new FPA, but refers to limits in this flexibility due to requirements of the Court of Auditors. One well-informed donor-funding expert disputed this claim, stating that ECHO requires more than the Court of Auditors actually needs.

6. THE WIDER CONTEXT OF HUMANITARIAN ACTION

The Consensus stresses that humanitarian aid needs to be seen in a wider context than just the immediate crisis it responds to. NGOs have worked for many years to address the practicalities of linking emergency interventions with development, and on reducing the risk of disaster. It was therefore important from the NGO perspective to include these themes in this study. Over recent years, Disaster Risk Reduction (DRR) and Linking Relief Rehabilitation and Development (LRRD) have been linked to the concept of resilience which has received increased attention.

6.1 DISASTER RISK REDUCTION

The survey demonstrated the view that one of the most important aspects of the Consensus is its inclusion of DRR and LRRD, as this was the fifth most common response to the question “*What aspects of the European Consensus do you consider most significant?*”¹⁶

A key element of the Consensus is reducing risk and vulnerability through enhanced preparedness, where it states that “*The EU is committed to promoting disaster risk reduction and disaster preparedness in developing countries through coherent and coordinated action at local, national and regional level.*”¹⁷ According to UNISDR, DRR is defined as “*The concept and practice of reducing disaster risks through systematic efforts to analyse and reduce the causal factors of disasters.*” A programme in a flood-risk area, for example, might address improved environmental management to stop flooding (prevention), riverbank reinforcement or dams (reducing the effect/ mitigation), early warning systems and evacuation planning/response capacity (preparedness) (VOICE 2012).

Including a DRR perspective in humanitarian aid and recovery is valuable; not only does a disaster create awareness of the importance of risk reduction and therefore a window of opportunity to initiate DRR measures, but integrating DRR is also part of the ‘build back better’ ethos. But it makes much more sense to start DRR before the disaster hits, so not all natural hazards become disasters. DRR should thus be prioritised and integrated into development programming, in order to adopt a long-term approach to enhance the resilience of communities: “*Donors should develop a risk reduction policy with high-level buy-in, advocate for risk reduction to be mainstreamed across all development planning and programming, focus on crisis mitigation opportunities in partner country strategies, and adjust funding streams to ensure a continuous risk reduction focus throughout the crisis cycle. But above all, donors need to change mindsets – ensuring development staff and partners are aware of why risk reduction is important*” (OECD-DAC 2012, p.13).

Where less progress has been made globally in terms of DRR is in reducing the underlying factors which make particular communities more vulnerable to disasters.¹⁸ DRR funding should thus not only be targeted to where needs are greatest, but should also use channels that ensure a difference at local level, including civil society. NGOs have a particular added value in supporting effective DRR programming, given their specific experience and engagement at the local level and their links with local level operations and capacity building. That implies that DRR funding should be accessible to NGOs as development and humanitarian actors for programmes at local, national and international level.

¹⁶ Following i) humanitarian principles ii) added value of NGOs iii) IHL & roles of military and civil protection iv) needs-based funding.

¹⁷ European Consensus on Humanitarian Aid, Article 75.

¹⁸ UNISDR HFA Mid-term review 2010-11.

The EU actor that NGOs feel is most engaged with DRR is ECHO, and this is who they engage with if they want to pursue DRR. An interview with ECHO confirmed this opinion. ECHO has established a target of 10% of funding for DRR and preparedness, which in 2012 they report surpassed 13-14%. ECHO's own view is that they *"have gone beyond the Consensus."*

It is difficult to say with certainty what the impact of the Consensus has been in promoting DRR among Member States. It is clear that some Member States have made an effort to incorporate DRR into their policies and strategies. These policy efforts are important to recognise, but there seems to be a significant gap with regard to actual support in practice. Only 4-5 Member States have specific DRR funding targets, according to ECHO.

More recently, the broader concept of resilience has taken a central stage: *"Resilience is understood to mean the ability of an individual, a household, a community, a country or a region to prepare for, to withstand, to adapt, and to quickly recover from stresses and shocks without compromising long-term development prospects"* (EU Council Conclusions, 28 May 2013).

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- Over the past two years the German government, primarily through its humanitarian department, has sought to play a lead role in developing new policy guidance in the area of DRR and preparedness at the international level. It has done so in particular in its capacity as Chair of the OCHA donor support group (2013), together with Poland as co-chairs of the GHD Initiative (2011-2012), as well as in its humanitarian communications (Federal Foreign Office of Germany 2013). Nevertheless, real achievements are harder to measure as there are no public budget lines available or reporting on activities. While German NGOs have been working to some degree with the government on DRR and preparedness, the overall sense among NGOs is that these are themes that the ministry has mostly taken up with UN agencies.
- The UK plays a leading role in the resilience agenda at the international level and has attempted to include DRR and resilience in its humanitarian policy and strategy. Among its seven policy goals, n° 1 is to *'strengthen anticipation and early action'*, and n° 2 is to *'build resilience to disasters and conflict'* (DFID 2011). Moreover, guidance was given to all DFID country offices to integrate risk in programming by 2015. In practice, it is hard to determine the extent to which these goals are currently being pursued with NGOs. There is a general feeling so far that NGOs have not been pushed too hard on the need to demonstrate how their humanitarian activities contribute to resilience- perhaps because this is not so easy to demonstrate in practice. Even though the UK has recently launched a fund called BRACED, which focuses on resilience programming for NGOs, its impact in real terms remains to be seen; initial observations noted that this fund is spread very thinly among various recipients.
- In the Netherlands, the government's Policy Framework for Humanitarian Aid includes a commitment to *"Focus more attention and resources on disaster risk reduction"* and *"Convince development partners of the importance of preventing disasters and limiting their effects"* (Ministry of Foreign Affairs of the Netherlands 2012). The country is fairly supportive of DRR in its funding, namely through the Partners for Resilience project, where the government has funded a group of five NGOs in the areas of resilience, DRR and climate change adaptation. In the Netherlands, funding for DRR, LRRD, or local capacity building is administered through development and not humanitarian departments. Overall, NGOs in the Netherlands appreciated the government's policies in this area.

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... CASE STUDY

- Sweden supports DRR and recovery efforts flexibly through both development and humanitarian budgets. To strengthen DRR at local level, Sweden supports a global network of local women's organisations and promotes the integration of a DRR perspective in the work of their humanitarian partner organisations (EC 2013).
- The Czech government has also made strides in the inclusion of DRR and LRRD in its policy, such as the 2013 Humanitarian Aid Operational Strategy. However, it is again difficult to determine if this translates into actual budget allocations and activities. According to Czech NGOs, LRRD and DRR are priorities on paper only and not in reality.

Many other Member States have not demonstrated specific engagement with DRR. This confirms the general impression that finding the political will to focus on preparedness and prevention has always been challenging. It is therefore no surprise that there is little support to NGOs for DRR activities.

In Denmark, NGOs have made DRR a priority in the context of protracted crises and have found ways to coordinate their humanitarian and development programmes and funding to pursue DRR, while the government has not prioritised these themes.

In summary, DRR contributes to overall sustainability efforts and is clearly an area where there is significant room for NGOs to advocate with their governments for increased action, demonstrate their added value, and seek government funding. Given the inclusion of DRR as one of the main topics in the Consensus, it can be a key tool for NGOs to use in this effort.

6.2 LINKING RELIEF REHABILITATION AND DEVELOPMENT

In the Consensus, the EU also commits to the concept of linking relief, rehabilitation and longer term development efforts (LRRD), sometimes also referred to as 'transition'.

The EU will work together on advancing practical approaches to LRRD (article 78).

LRRD is both a way of thinking and a practical methodology, to ensure that humanitarian programming does not undermine development work and that development programming builds on humanitarian knowledge (e.g. around vulnerability of certain populations) and results, enhancing effectiveness (including cost-effectiveness) and efficiency (VOICE & CONCORD, 2012). LRRD is difficult to achieve because of diverse cultures, different principles (humanitarian principles versus Paris Declaration) and separate funding streams. But the EU has learnt from past experiences, and has increasingly worked towards LRRD since 2011. In the recent case of renewed conflict in the Central African Republic, for example, measures were taken in 2013 to continue part of the programming which is still possible (e.g. support police forces and the capacity of independent media, fund inter-community reconciliation initiatives, support human rights observations missions), and put other bilateral programmes on hold until a new government is up and running.

Despite these positive developments at EU level, progress on LRRD in Member States is much more varied. Answering the questions *"How well coordinated is humanitarian and development*

programming within the government?" and "To what degree does your government provide flexible funding to bridge the humanitarian-development 'gap'?", NGOs give an average score of only 2.6/5, while governments give themselves 3.5/5.

In some Member States NGOs consider that their governments have clearly not engaged with the subjects of LRRD, DRR, and capacity-building. French NGOs feel that *"France's policy and thinking is far behind"*, and state that the Consensus has had very little influence in this regard. Italian NGOs have expressed similar concerns.

ECHO cites increased cooperation with development colleagues on the policy side, as evidenced in the recent approval of the Resilience Action Plan. While ECHO has tried to encourage Member States in a similar direction, this has proved challenging due to the need to coordinate among different ministries. What remains to be seen, both at EC and Member State levels, is whether there is sufficient flexibility in new funding instruments to ensure LRRD.

In conclusion, Member States' efforts around LRRD vary significantly across the EU. Some are making greater efforts to develop a resilience agenda, which can support LRRD, some are doing so within the context of their humanitarian funding streams and others are pursuing it in their development programming. In all cases, however, NGOs feel that governments need to do more to promote both DRR and LRRD, clarifying and strengthening their approaches, linking development and humanitarian efforts, increasing their funding streams and making them more flexible.

6.3 LOCAL PARTNERS AND CAPACITY BUILDING

The Consensus has identified the need for the EU to *"examine how best it can offer support to capacity-building activities for sustainable strengthening of local disaster response, and encourage implementing partners in fostering partnerships with local organisations in affected communities"* (DG ECHO 2007). Local actors are the first to respond when a disaster strikes and will remain long after international organisations have left, so including local and national capacity building for emergency response into programming is key. Moreover, using the local partners' knowledge to set up projects can substantially improve the effectiveness of humanitarian aid.

Despite this focus in the Consensus and general acknowledgement of the need to work with local partners, the application in practice is still significantly lacking among donors and NGOs alike. While the UK and Germany have promoted local partnerships in their policies, this does not appear to translate into actual engagement. In the case of Spain and Italy, a lack of consistency and clarity over the definition of capacity building activities and their relation to local partners hinders efforts in this direction. The Czech Republic offers a promising example of providing funding for capacity building, but this has not necessarily translated into working with local partners.

Despite the commitment under the Consensus to seek means to support capacity-building activities for the strengthening of local disaster response, in general, humanitarian funding from Member States and ECHO goes to European NGOs, who then can work with or through local partners if they choose to do so. The reasons that were most commonly cited by governments for not funding local organisations directly are lack of oversight capacity, lack of know-how about working with local partners and the potential risk involved, whether political or in terms of financial accountability. For many donors, such as Belgium, legal requirements also inhibit direct financing to local civil society. However, short-

term project-centred engagement with local partners by European NGOs- which is the only kind of engagement possible under most humanitarian funding cycles- does not generally provide the basis for long-term partnership and capacity building¹⁸.

In VOICE member CAFOD's large scale research¹⁹ only 8.6% of humanitarian funding tracked during 2011 was channelled through national NGOs²⁰, and only 16 million USD or 0.1% of total funding in the same period was given directly to national NGOs. How much of development spending is attributed to building up the disaster response capacity of local NGOs and authorities is not clear.

Capacity building is thus another area where efforts to engage with local partners have far to go, and it remains an area that requires much more attention from the EU. Changing how we do business will take a lot of time and energy, and better recognition of the obstacles and challenges ahead is needed from all stakeholders, including donors. It is crucial, however, to work in steps towards putting southern organisations at the centre of response, rather than only paying lip service to this goal. Then we will finally put into practice the lessons learnt from the 2004 Tsunami: *"The international humanitarian community needs a fundamental reorientation from supplying aid to supporting and facilitating communities' own relief and recovery priorities"*²¹.

Overall, while certain components of the Consensus are easily identified and have been readily appropriated, such as the humanitarian principles, others require greater attention to improve the quality and scope of EU humanitarian aid; the review found that the areas of disaster risk reduction (DRR) linking relief to rehabilitation and development (LRRD) and capacity building of local actors are particular examples of this.

¹⁸ VOICE Out Loud issue 18, 2013.

¹⁹ CAFOD, Funding at the Sharp End 2013.

²⁰ Funding tracked under the research from bilateral donors, three UN agencies, UN pooled funds, IFRC and five UK-based INGOs.

²¹ Tsunami evaluation coalition report, available at www.alnap.org/pool/files/889.pdf.

CONCLUDING REMARKS: MAIN FINDINGS AND RECOMMENDATIONS

MAIN FINDINGS

The main outcome of this review is that **NGOs and EU Member States are united in their assessment of the value of the Consensus**, which, they say, derives first and foremost from the humanitarian principles that it promotes. The European Consensus has played a pivotal role in creating a common vision of best practice for principled humanitarian action.

While Member States are more familiar with the Consensus than NGOs, this is somewhat to be expected as the document is addressed to and signed by them. In many instances, Member States' appreciation for the Consensus has translated into their humanitarian policy documents, as most make reference to the Consensus.

The key question relates to implementation of and compliance with the Consensus. NGOs see a gap between rhetoric and actual practice, and agree that they could do more to monitor Member States' application of the Consensus.

The areas of the Consensus which NGOs feel need greater attention from Member States are very much in line with the components they consider most important: humanitarian principles and the added value of NGOs. Member States, on the other hand, most frequently responded that there are no areas in need of greater attention. The continued insistence on humanitarian principles from NGOs indicates that they see a gap between the emphasis on humanitarian principles at the policy level and Member States' actual implementation of these policies.

For both Member States and NGOs, **humanitarian principles are the most important part of the Consensus**. Humanitarian principles are very much present in Member States' humanitarian policies. NGOs recognise that the humanitarian departments of their governments make an effort to defend humanitarian principles in government decisions - but that they are not always successful in this.

However, **NGOs are critical of the application in practice of the humanitarian principles** and expressed concern over the independence of humanitarian decisions from other government priorities (political, economic, military, etc.). Participating Member States report that their non-humanitarian colleagues in government are not sufficiently familiar with humanitarian principles, but overall they are not particularly concerned about this unfamiliarity affecting humanitarian decisions. NGOs, on the other hand, see this as an issue that needs more attention. The interference with the humanitarian agenda from the political side of governments is seen as problematic, especially in high profile crises when ministers want their constituents to see them taking action. A significant number of survey responses stressed that one of the most important aspects of the Consensus was its focus on needs-based funding – i.e. practice derived from the core principle of impartiality. However, the NGO perception is that funding is often linked to non-humanitarian considerations.

There is recognition by Member States of the importance of questions of **humanitarian-military distinction and interaction**, and good examples of corresponding integration into policy. As a result, some Member States work to support mutual understanding by creating opportunities for dialogue

between humanitarian organisations and the military. Such participation is likely to improve the knowledge of the military on the specificities of humanitarian action. However, NGOs are less certain that these contacts and exchanges will keep the military out of aid delivery, as mandates of military missions are determined by politicians. This concern has been illustrated by some cases of gaps between policy and practice.

Coordination between Member States and NGOs on humanitarian policy and practice at the national level is critical in ensuring that the humanitarian principles and other elements of the Consensus are respected and implemented. NGOs find their governments relatively accessible and, in many countries, meet quite regularly with humanitarian officials in coordination forums. Such forums with government agencies have been useful for NGOs to raise issues of concern and strive to influence government humanitarian policies and strategies. However, both NGOs and Member States agree that these encounters are not being used to their full potential to discuss strategic humanitarian issues. While having a meaningful dialogue seems to depend heavily on the individuals involved, a more systematic coordination could be useful.

The added value of NGOs in the response to humanitarian crises is one of the most important issues of the Consensus for them. **Funding to NGOs** is one way to measure the extent to which governments see the added value of NGOs and look to them to provide humanitarian assistance.

Two main conclusions can be drawn related to Member States' funding of NGOs: firstly, positive and open relationships do not necessarily translate into actual funding. Because of the reduced percentages of humanitarian funding going to NGOs (as opposed to the UN or International Organisations) in several Member States, the emerging picture is that ECHO has become an essential donor for the humanitarian operations of a number of NGOs.

Secondly, a number of Member States continue overwhelmingly to favour UN agencies when assigning their humanitarian budgets. This distribution of funds does not reflect the comparative advantages and the proportion of aid delivered by NGOs. The Consensus notes that NGOs are essential to humanitarian response as they deliver the majority of international humanitarian aid due to their field presence, flexibility and specialisation. NGOs feel that this reality needs to be better reflected in donor decision making.

Despite the Consensus promoting the reduction of **administrative requirements** on partners, NGOs report that this has not been the case. The administrative burden related to managing funds from EU donors is a significant concern for NGOs; this is not only a question of reporting, but can relate to donor information requirements at many different stages of the project cycle. It must be noted that there are diverging practices among the Member States. These differences beg the question of what should be seen as an appropriate balance between administrative requirements and flexibility, and at what point administration requirements start hampering the effectiveness of humanitarian operations and the efficient use of resources. NGOs also repeatedly noted that Member States have considerably more stringent administrative requirements for NGOs compared to UN agencies.

While certain components of the Consensus are easily identified and have been readily appropriated, others remain largely ignored and require greater attention, not only on the part of governments, but also by NGOs in their advocacy efforts to improve the quality and scope of humanitarian aid from the EU and its Member States. The review found that the areas of disaster risk reduction (DRR), preparedness and linking relief to rehabilitation and development (LRRD) are particular examples of this.

Some Member States have made an effort to incorporate **Disaster Risk Reduction** (DRR) into their policies and strategies. These policy efforts are important to recognize, but there seems to be a significant gap with regard to actual support in practice. Many other Member States have not

demonstrated specific engagement with DRR. This confirms the general impression that finding the political will to focus on preparedness and prevention has always been challenging. It is therefore no surprise that there is little support to NGOs for DRR activities.

DRR contributes to overall sustainability efforts and is clearly an area in which there is significant room for NGOs to advocate with their governments for increased action, demonstrate their added value, and seek government funding.

Despite positive developments at EU level, Member States' efforts around **Linking Relief Rehabilitation and Development** (LRRD) vary significantly across the EU. Some Member States that are making greater efforts to develop a resilience agenda – which can support LRRD – are doing so within the context of their humanitarian funding streams, while others are pursuing it in their development programming. In all cases, however, NGOs feel that governments need to do more to promote both DRR and LRRD, clarifying and strengthening their approaches, linking development and humanitarian efforts, and increasing their funding streams and making them more flexible.

Despite the commitment under the Consensus to seek means to support capacity-building activities for the **strengthening of local disaster response**, in general, humanitarian funding from Member States goes to European NGOs, who then can work with or through local partners if they choose to do so. Capacity building is thus another area where efforts to engage with local partners have far to go, and it remains an area that requires much more attention, especially from development actors.

KEY RECOMMENDATIONS

1. Member States and NGOs should use the Consensus actively to inform both humanitarian policies and practice. Member States should use it as their core reference to ensure that their actions, funding and programming decisions are consistent with the principles contained in the Consensus. Member States should also continue developing national humanitarian strategies which reflect these principles.
2. At EU level a follow-on Action Plan to the Consensus should be a key tool to support a coordinated and collective approach to a number of agreed priority areas. Member States and the Commission should commit to its joint implementation.
3. Parliaments and NGOs should use the Consensus more to systematically monitor government behaviour and hold governments to account against their commitments.
4. Member States should use the Consensus to ensure respect for humanitarian concerns in all areas of their policy and action. A wider understanding and application of the principles of the Consensus and their legal basis is important to avoid the instrumentalisation of humanitarian aid for political purposes.
5. Member States and NGOs should engage in systematic exchanges on humanitarian issues. Learning from examples of good practice in some Member States should be considered by other Member States that have still to develop informal/formal coordination mechanisms. With regard to specific crises, early discussion and/or collaboration between governments and NGOs with field-presence is important to ensure that response programming and policy are informed by operational concerns.

6. Dialogue between humanitarian NGOs and the military is particularly important to ensure clarity in relation to respective mandates and roles, and respect for and adherence to humanitarian principles. Member States should create opportunities for such dialogue both at planning and pre-deployment stage, and during engagement in the field.
 7. Member States should consider re-balancing the distribution of funds between humanitarian actors to reflect the comparative advantages and the proportion of aid delivered by NGOs. They should undertake a more thorough analysis of the comparative advantages of each of the three main operational humanitarian families – the UN, International Organisations, and NGOs – especially at a time when they put such emphasis on ‘value for money’ and results-based management.
 8. In the interest of aid effectiveness, Member States as donors should make measurable efforts to reduce the administrative burden for NGOs. This should include reviewing their information requirements at all stages of the project cycle. Member States should seek further ways to harmonise their administrative requirements and templates.
 9. The Consensus should be used as a tool to further work on LRRD and DRR by Member States, NGOs and other relevant actors. More effort is needed to raise awareness of the importance of investing in DRR measures, especially at local level, and to secure active integration of DRR into development policy and practice. Member States need to grant greater priority to LRRD by improving coordination between governments’ humanitarian and development agencies, and providing more flexible LRRD funding to allow partners to respond in a way that reflects evolving needs.
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REFERENCES

- Baker, J., Dross, E., Shah, V. & Polastro, R. (2013). Study: How to Define and Measure Value for Money for the Humanitarian Sector. Sida. Available from: <http://sidapublications.citat.se/interface/stream/mabstream.asp?filetype=1&orderlistmainid=3659&printfileid=3659&filex=5286236623461> [Accessed 23 October 2013]
- CAFOD (2013) Funding at the Sharp End: Investing in national NGO response capacity [http://www.cafod.org.uk/content/download/11549/90759/file/CAFOD%20national%20ngo%20financing%20study%20July%202013%20\(3\).pdf](http://www.cafod.org.uk/content/download/11549/90759/file/CAFOD%20national%20ngo%20financing%20study%20July%202013%20(3).pdf)
- Caritas Europa (2011). Bridging the Gap Between Policy and Practice: The European Consensus on Humanitarian Aid and Humanitarian Principles. October. Available from: http://www.mzv.cz/public/a/7a/5d/795983_713201_BridgingtheGap_ENdefinite.pdf [Accessed 5 November 2013]
- Department for Development Policy and the Ministry for Foreign Affairs of Sweden (2010). Saving lives and alleviating suffering: Policy for Sweden's humanitarian assistance 2010-2016. Available from: <http://www.government.se/content/1/c6/17/29/10/d4bb1993.pdf> [Accessed 21 October 2013]
- Directorate General for Humanitarian Aid and Civil Protection (DG ECHO) (2007). European Consensus on Humanitarian Aid: The Humanitarian Challenge. Available from: http://ec.europa.eu/echo/files/media/publications/consensus_en.pdf [Accessed 16 October 2013]
- European Commission (2010). The mid-term review of the European Consensus on Humanitarian Aid Action Plan - implementing effective, principled EU humanitarian action. Available from: http://ec.europa.eu/echo/files/policies/consensus/mid-term_review/1_EN_ACT_part1_v21.pdf [Accessed 11 November 2013]
- European Commission (2013). Annual Report on the implementation of the European Consensus on Humanitarian Aid 2012. Available from: http://ec.europa.eu/echo/files/policies/consensus/2012_Consensus_Annual_Report.pdf [Accessed 10 February 2014]
- Federal Foreign Office for Humanitarian Assistance Abroad of Germany (2012). Strategy of the Federal Foreign Office for Humanitarian Assistance Abroad. July. Available from: http://www.auswaertiges-amt.de/cae/servlet/contentblob/634144/publicationFile/177865/121115_AA-Strategie_humanitaere_hilfe.pdf [Accessed 14 October 2013]
- Federal Foreign Office of Germany (2013). Humanitarian Disaster Risk Reduction. April. Available from: http://www.auswaertiges-amt.de/EN/Aussenpolitik/HumanitaereHilfe/130412_HuHi_Preparedness_node.html [Accessed 22 October 2013]
- Ministry for Foreign Affairs of Finland (2012). Finland's Humanitarian Policy. Available from: <http://forin-origin.finland.fi/public/default.aspx?contentid=101288&nodeid=15457&contentlan=2&culture=en-US> [Accessed 4 November 2013]
- Ministry of Foreign Affairs of the Czech Republic (2013). 2013 Humanitarian Aid Operational Strategy of the Czech Republic. Available from: http://www.mzv.cz/public/971301891948674_870024_StrategyHumAid2013en.doc [Accessed 21 October 2013]
- Ministry of Foreign Affairs of the Czech Republic (2010). The Development Cooperation Strategy of the Czech Republic 2010 – 2017. Available from: http://www.mzv.cz/file/762314/FINAL_Development_Cooperation_Strategy_2010_2017.pdf
- Ministry of Foreign Affairs of Denmark, DANIDA (2009). Strategy for Danish Humanitarian Action 2010-2015. September. Available from: http://drc.dk/fileadmin/uploads/pdf/IA_PDF/relief_work/emergency_roster/StrategyforDanishHumanitarianAction2010-15.pdf [Accessed 14 October 2013]
- Ministry of Foreign Affairs of Finland (2012). Finland's Humanitarian Policy. October. Available from: <http://forin-origin.finland.fi/public/default.aspx?contentid=101288&nodeid=15457&contentlan=2&culture=en-US> [Accessed 21 October 2013]
- Ministry of Foreign Affairs of France (2012). La stratégie humanitaire de la France pour 2012-2017. July. Available from: <http://www.diplomatie.gouv.fr/fr/politique-etrangere-de-la-france/action-humanitaire-d-urgence/colonne-droite-1680/pour-en-savoir-plus-22091/article/la-strategie-humanitaire-de-la> [Accessed 14 October 2013]
- Ministry of Foreign Affairs of the Netherlands (2012). Aid for People in Need: Policy Framework for Humanitarian Aid. March. Available from: <http://www.government.nl/files/documents-and-publications/reports/2012/03/29/aid-for-people-in-need/aid-for-people-in-need.pdf> [Accessed 21 October 2013]
- Organisation for Economic Co-operation and Development (OECD) Development Assistance Committee (DAC) (2009). Available from: <http://www.oecd.org/dac/peer-reviews/italy2009dacpeerreview-mainfindingsandrecommendations.htm> [Accessed 4 November 2013]
- Organisation for Economic Co-operation and Development (OECD) (2012). Towards better humanitarian donorship, 12 lessons from DAR peer reviews. Available from <http://www.oecd.org/dac/peer-reviews/towardsbetterhumanitarianonorship.htm> [Accessed 10 February 2014]
- United Kingdom Cabinet Office (2011). Strategic National Framework on Community Resilience. Available from: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/60922/Strategic-National-Framework-on-Community-Resilience_0.pdf [Accessed 3 December 2013]
- United Kingdom Department for International Development (DFID) (2011). The UK Government's Humanitarian Policy. Available from: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/67468/The_20UK_20Government_s_20Humanitarian_20Policy_20_20September_202011_20_20Final.pdf [Accessed 21 October 2013]
- United Nations Office for the Coordination of Humanitarian Affairs (OCHA) (2013). Financial Tracking Service (FTS). Available from: <http://fts.unocha.org/>
- VOICE (2008). Newsletter VOICE Out loud, no. 8, Humanitarian NGOs and EU diversity. Available from: http://www.ngovoice.org/documents/voice_out_loud_8_December_2008_HD.pdf [Accessed 15 October 2013]
- VOICE (2009). VOICE position on civil-military relations in humanitarian action: Recommendations to the European Union. Available from: http://www.ngovoice.org/documents/CIV%20MIL%20POLICY%20DOCUMENT%20_%20FINAL.pdf [Accessed 14 October 2013]
- VOICE (2012). VOICE position paper on Disaster Risk Reduction-a fundamental element of building resilience. Available from: <http://www.ngovoice.org/documents/2012%20VOICE%20position%20paper%20DRR-%20resilience-FINAL.pdf> [Accessed 15 October 2013]
- VOICE & CONCORD (2012). VOICE-CONCORD position paper on Linking Relief Rehabilitation and Development (LRRD): Towards a more joined up approach enhancing resilience and impact. Available from: <http://www.ngovoice.org/documents/VOICE%20CONCORD%20position%20paper%20Linking%20Relief%20Rehabilitation%20and%20Development-July%202012.pdf> [Accessed 15 October 2013]
- VOICE (2013). Newsletter VOICE Out Loud, no. 18, Whose emergency is it anyway, the role of local actors. Available from: <http://www.ngovoice.org/documents/voice%20out%20loud%2018%20oct.pdf> [Accessed 8 November 2013]

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VOICE stands for Voluntary Organisations in Cooperation in Emergencies. It is a network representing 83 European non-governmental organisations (NGOs) active in humanitarian aid worldwide. VOICE is the main NGO interlocutor with the European Union on emergency aid, relief, rehabilitation and disaster risk reduction. As a European network, it represents and promotes the values and specificities of humanitarian NGOs, in collaboration with other humanitarian actors.



**Humanitarian Aid
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