

# Public Consultation on the External Financing Instruments of the European Union

Fields marked with \* are mandatory.

## Profile

---

\* 1 You are/represent

- Citizen/individual
- Industry, business or workers's organisations
- EU platform, network, or association
- Organisation or association
- Public authority
- Consultancy
- Research/academia
- Other

\* 2 Your name and/or name of your organisation

Wildlife Conservation Society

\* 3 Country of residence or location of headquarters

United States

\* 4 E-mail

jweatherleysingh@wcs.org

5 Identification number in the Transparency Register (if applicable)

10132247681-61

\* 6 Your contribution

- can be directly published with your personal/organisation information.
- can be directly published provided that you/your organisation remain(s) anonymous.
- cannot be directly published but may be included within statistical data.

## Evaluations - Looking at past experience

---

### Development Cooperation Instrument

7 How well do you think the DCI has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency; EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

8 How well do you think the DCI has addressed the objectives of development co-operation more specifically in Least Developed Countries? To what extent has the DCI had an impact on poverty reduction and sustainable development in Middle Income Countries, where pockets of poverty persist and which may play a critical role to tackle regional and global challenges?

9 The evaluation has found that many partner countries often disagree on the place and weight to be given to human rights issues and governance, which are part of the principles that guide the external action of the EU, including the DCI. Has the DCI enabled the EU to project its principles and values (e.g. democracy, the rule of law, human rights and fundamental freedoms)?

10 The DCI accommodates internal EU policy concerns, such as migration and climate change, in external action. To what extent do you think the DCI has been able to adapt to shifts in policy and the external environment?

The DCI needs to give greater emphasis towards addressing the root causes of migration. In particular new emphasis needs to be given towards combating growing environmental challenges which can also become drivers of migration. This includes climate change (which can be linked to food insecurity and drought) and wildlife trafficking (which can be linked to insecurity and a breakdown in local governance).

**11 If you have any other views on the DCI you would like to share, they are welcome here.**

The EU needs to continue to increase spending on biodiversity, in line with its commitment in the EU Biodiversity Strategy and under its international commitment in the Convention on Biological Diversity to double international financial flows for global biodiversity. It also needs to increase funding dedicated towards fighting wildlife trafficking as highlighted in the 2016 EU Action Plan against Wildlife Trafficking.

The EC has put considerable effort into developing a series of strategic guidance documents on wildlife conservation, including the Larger than Elephants report which provides a highly comprehensive overview of needs and opportunities for wildlife conservation. If funded and implemented, this would have a game-changing impact on saving African wildlife. Similar reports are being developed for Asia and Latin America. We therefore recommend the EU earmarks dedicated funding within the DCI towards implementing these strategies (including for marine areas).

We welcome the current EU Global Public Goods and Environmental Challenges Programme (GPGC) under the DCI which promotes holistic responses to societal and environmental challenges and as such will be a key tool to support the implementation of the SDGs. In particular we welcome the EU's flagship programme on biodiversity. As the natural environment underpins livelihoods and development it is crucial the EU invests further in ecosystem protection not only for wildlife but also for the benefits to people related to health, food, agriculture, social and economic development. This includes the need to invest in marine protected areas and coastal fisheries to implement the EU's policy agenda on ocean governance. Additionally, investing in the fight against wildlife trafficking (as detailed in the EU Action Plan against Wildlife Trafficking) can contribute to achieving EU policy objectives related to peace and security.

## **European Development Fund**

**12 How well do you think the 11th EDF has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency, EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.**

**13 Has the 11th EDF, for which partner country ownership is a specific feature, reflected the views of beneficiary countries and the full range of their constituencies (including civil society organizations)? Please feel free to provide some specific examples.**

14 Do you think the regional and intra-ACP cooperation is efficient, effective and coherent with country level actions? Please provide reasons to support your response.

15 If you have any other views on the EDF you would like to share, they are welcome here.

The EU needs to continue to increase spending on biodiversity, in line with its commitment in the EU Biodiversity Strategy and under its international commitment in the Convention on Biological Diversity to double international financial flows for global biodiversity. It also needs to increase funding dedicated towards fighting wildlife trafficking as highlighted in the 2016 EU Action Plan against Wildlife Trafficking.

The EC has put considerable effort into developing a series of strategic guidance documents on wildlife conservation, including the Larger than Elephants report which provides a highly comprehensive overview of needs and opportunities for wildlife conservation. If funded and implemented, this would have a game-changing impact on saving African wildlife. Similar reports are being developed for Asia and Latin America. We therefore recommend the EU earmarks dedicated funding within the EDF towards implementing these strategies (including for marine areas).

## European Instrument for Democracy and Human Rights

16 How well do you think the EIDHR has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency; EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

17 Are the current scope and components of the EIDHR (Human Rights, Democracy, Electoral observation) appropriately balanced to meet the beneficiaries' needs? Please explain your view.

18 Are the current priorities of the instrument appropriate? In particular, do you think that those countries where democracy and human rights are most under threat are appropriately supported? Please provide reasons to support your view.

19 If you have any other views on the EIDHR you would like to share, they are welcome here.

## European Neighbourhood Instrument

20 How well do you think the ENI has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency; EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

21 Is the incentive-based approach under the ENI regulation a sound framework for fostering further reforms in partner countries in the neighbourhood? Does it suit the present regional context and did it induce a measurable change in depth or rhythm of structural reforms? Please provide reasons in support of your view.

22 Does the European Neighbourhood Instrument, as it stands, in association with other EU external action financing instruments, have the capacity to contribute to the stabilisation of the region? Please provide reasons in support of your view.

23 If you have any other views on the ENI you would like to share, they are welcome here.

## Greenland Decision

24 How well do you think the Greenland Decision has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency; EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

25 To what extent do the Greenland Decision and the partnership with Greenland contribute to the EU playing a more influential role in the Arctic region?

26 If you have any other views on the Greenland Decision you would like to share, they are welcome here.

## **Instrument contributing to Stability and Peace**

27 How well do you think the IcSP has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency; EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

28 Do you think the IcSP is able in its current format to work on crisis response, address global threats to peace and to seize windows of opportunities to build peace? Please give reasons for your views.

29 To what extent have the means provided by the IcSP to-date proven effective in strengthening civil society and international organisations in their capacity to contribute to global peace and security?

30 Responding to security concerns that affect both third countries and the EU may imply working with authorities whose human rights approach can be challenged. Funding support to them, even after due precautions have been taken, implies certain risks. Can the EU still add value in such circumstances by the ICSP being more proactively engaged in sectors such as counter-terrorism, organised crime, and cybersecurity or should the IcSP rather limit its engagement? Please give reasons for your views.

31 Do you think that the focus of dialogues between the IcSP and other relevant donors has been appropriate to improve the global donor approach to stability and peace? Please give reasons for your views and/or suggestions.

32 If you have any other views on the IcSP you would like to share, they are welcome here.

The EU committed to fighting wildlife trafficking with the publication of its Action Plan against Wildlife Trafficking in 2016. The EU Action Plan highlights the increasing involvement of organised international criminal groups in this activity. In some areas of sub Saharan Africa, rebel groups have turned to the illegal wildlife trade to finance their operations; creating a climate of terror in affected communities, causing a break down in local governance and resulting in the deaths of park rangers. We do not have any direct experience of IcSP instrument but as the EU Action Plan recognises the need for new and substantial amounts of EU development aid to be directed towards fighting wildlife trafficking, we recommend it should be a priority within the EU’s funding instrument for peace and security.

### **Instrument for Nuclear Safety Cooperation**

33 How well do you think the INSC has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency; EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

34 Do you consider that concentration on accession countries and countries in the European neighbourhood area is appropriate? Please give reasons to support your view.

35 If you have any other views on the INSC you would like to share, they are welcome here.

### **Instrument of Pre-accession Assistance**

36 How well do you think the IPA II has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency; EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

37 To what extent do you think the strategic orientation of IPA II and the political dialogue between the EU and the Governments in beneficiary countries is adequately addressing the desired improvement of a truly inclusive public consultation?

38 To what extent do you think the strategic orientation of IPA II and the political dialogue between the EU and the Governments in beneficiary countries are adequately addressing the key issue of fight against corruption?

39 If you have any other views on the IPA II you would like to share, they are welcome here.

## **Partnership Instrument for cooperation with third countries**

40 How well do you think the PI has addressed its objectives? The main assessment criteria for the evaluation are: relevance; effectiveness, impact and sustainability; efficiency; EU added value; coherence, consistency, complementarity and synergies; and leverage. Feel free to comment on the findings, conclusions or recommendations for any/all of the criteria.

41 Do you think the PI was an adequate instrument to respond to global challenges and to advance EU and mutual interests and that it enhanced the EU's ability to engage on these issues? Please give reasons to support your view.

42 Do you think the PI has delivered relevant and useful results advancing co-operation and dialogue with a range of countries on issues such as climate change, the protection of the environment, energy, economic and trade relations or the promotion of the European Union's values? Please give reasons to support your views.



43 Do you think the PI has allowed the EU to engage strategically with countries that are not covered by other EU instruments and by focusing on policy issues for which no other funding sources are available? Has the PI been complementary to the other EU external financing instruments? Please give reasons to support your view.

We do not yet have direct experience with the PI but welcome the development of this EU funding instrument to support key policy dialogues particularly in relation to discussions on issues such as climate change and the protection of the environment. Such an instrument should be used to provide crucial support to achieve EU objectives in international conventions such as CITES. Furthermore, policy dialogue with third countries, especially in Asia, is highlighted within the EU Action Plan against Wildlife Trafficking as necessary to achieve demand reduction for wildlife products and the PI could be mobilised to help achieve this.

44 If you have any other views on the PI you would like to share, they are welcome here.

### **Common Implementing Regulation**

45 Your views on the findings, conclusions and recommendations of the CIR evaluation are welcome here.

### **Additional comments**

46 If you have any other views common to several or all instruments you would like to share, they are welcome here.

As mentioned above for the specific instruments, the EU needs to continue to increase spending on biodiversity, in line with its commitment in the EU Biodiversity Strategy and under its international commitment in the Convention on Biological Diversity to double international financial flows for global biodiversity. It also needs to increase funding dedicated towards fighting wildlife trafficking as highlighted in the 2016 EU Action Plan against Wildlife Trafficking.

The EC has put considerable effort into developing a series of strategic guidance documents on wildlife conservation, including the Larger than Elephants report which provides a highly comprehensive overview of needs and opportunities for wildlife conservation. If funded and implemented, this would have a game-changing impact on saving African wildlife. Similar reports are being developed for Asia and Latin America. We recommend the EU earmarks dedicated funding across its funding instruments towards implementing these strategies (including for marine areas).

## Looking forward to arrangements for the External Financing Instruments post 2020

---

The External Financing Instruments which support the EU's external actions will expire at the end of 2020. The questions below are about possible, future options for EU external financing instruments. Respondents should not feel bound by current arrangements of the instruments and are encouraged to reflect openly and creatively. Where applicable, contributors are encouraged to illustrate their answers with experiences from other organisations/donors.

### Structure and content

47 Considering the evolving EU policy framework (such as the EU Global Strategy for the European Union's Foreign and Security Policy and the 2030 Agenda and its Sustainable Development Goals) and key global challenges (such as sustainable growth and jobs creation, migration, security, peace-building, crisis response, environment and climate change), what kind of External Financing Instruments are needed after 2020 in terms of structure and content, bearing in mind the possible future of the European Development Fund? If relevant, justify the level of financial assistance needed compared to the current instruments.

We have not yet developed a full position on the future EU budget but we believe that:

- The priority should be on delivering the 2030 Agenda and implementation of the SDGs
- New and substantial EU resources should be earmarked towards tackling growing environmental challenges which also support a range of SDGs, especially in relation to wildlife trafficking (which is linked, for example, to achieving peace and security); conservation of marine protected areas and coastal fisheries (linked to food security and livelihoods); as well as forests and other terrestrial ecosystems which are essential to achieving food security, sustainable agriculture and fisheries, economic development and resilience.
- More resources need to be allocated towards addressing the root causes of migration, especially the environmental causes which have been given little attention to date.
- We believe that earmarking funding towards implementation of the 'Larger than..' strategies for Africa, Asia and Latin America should be a high priority of the next EU budget in order to conserve biodiversity and secure the protection of the natural environment (including the marine environment) for the range of benefits this provides to people, especially the very poorest.

48 Do you see room for EU external assistance initiatives beyond the scope of the existing instruments, and if so in what fields?

## Complementarity, coherence and leverage

49 How can the EU increase the coherence between its external financing instruments and programmes supporting internal policies, notably those with a strong external dimension (e.g. migration, research, higher education)?

The EU needs to pay greater attention to the impacts of its own consumption patterns on third countries, so that it is not undermining investments in environmental protection by importing products with environmentally damaging impacts. We support, for example, the development of an EU Action Plan against Tropical Deforestation, to give greater policy coherence and develop policies that address EU consumption.

50 How to improve the complementarity between the EU's external assistance and the external assistance of its Member States, as well as the right articulation with other actors' cooperation (e.g. third countries, international organisations, private sector, development banks)?

51 To what extent and how best should the EU leverage additional funds (public and private) through innovative mechanisms, like blending, guarantees and trust funds?

There is increasing interest in using public funding to leverage private sector funding for biodiversity conservation. WCS is engaged in furthering innovate thinking on this issue and willing to provide advice to the EU as it looks to increase the impact of its investments by engaging the private sector. We also recognise, however, that private sector funding is no substitute for EU development aid and urge the EU to also provide substantial levels of public funding to wildlife conservation linked to poverty alleviation in developing countries, as this issue is not easily financed by other means.

52 Should the instruments be geographically or thematically structured, or is a mix of both more convenient? What delineation should there be between the corresponding instruments /programmes?

## **Flexibility and simplification**

53 To what extent should the External Financing Instruments ensure more flexibility (currently limited, for example, through long-term, ring-fenced envelopes), in order to better respond to evolving challenges – while preserving predictability and long-term engagement with partner countries (where the latter is needed)?

Tackling environmental challenges is complex and requires long-term sustainable funding sources. We therefore welcome efforts to provide long-term, ring-fenced sources of funding (such as Trust Funds) to address this issue.

54 Should EU external assistance focus more on approaches based on incentives?

55 Should the design and delivery of EU external assistance be further simplified, and if so, how could this be achieved?

We welcome any efforts to simplify and increase the transparency of EU funding programmes which are complex to understand and manage. This prevents many conservation NGOs that could deliver good projects from being able to access funding.

## Additional comments

56 If you have any other views on the future instruments you would like to share, they are welcome here.

## Contact

europeaid-06@ec.europa.eu

---