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## **Mid-term review of the regional multi-annual indicative program (MIP) for Sub-Saharan Africa (2021-2027)**

**4 September 2023**

This written feedback has been prepared by WWF European Policy Office to contribute to the mid term review process of the regional multi-annual indicative programme for Sub-Saharan Africa (RMIP SSA) and in response to the consultation meeting organised by the Policy Forum on Development and DG INTPA A2 on 11 July 2023.

- *Do the NDICI regional programme for SSA priorities and related objectives remain relevant to address current challenges?*
- *Are there any emerging or worsening issues we should take into consideration to achieve the intended results of the current priorities?*
- *What specific regional issues should the programme address in priority?*

### **Summary of recommendations:**

- Include appropriate funding modalities for CSOs
- Increase financing for biodiversity protection to fulfil the EU's global commitments under the recently adopted Kunming-Montreal Global Biodiversity Framework
- Use the MTR to redirect and mobilise technical and financial resources required to support EU partner countries in Sub-Saharan Africa to comply with the new EU Deforestation Regulation
- Use an array of financial tools to uphold the EU's Congo Basin forests pledge
- Improve NaturAfrica inception processes to avoid reductions and delays in funding allocations and programme implementation
- Foster a more transparent and instructive approach to sharing NaturAfrica funding with the spectrum of pertinent stakeholders to foster the understanding and development of consortiums fit for the NaturAfrica funding modalities in use
- Enhance the delivery and impacts of Sustainable Agriculture Aquatic Food Systems by strengthening
  - the research required to shift policy across Sub-Saharan African countries towards agroecology
  - commitments in aquatic food systems, increased access to related funding for CSOs, enhanced attention to the water-food nexus, support to domestic food products and to climate change adaptation
- Take more explicit measures to support inclusion and participatory approaches

## 1. Funding modalities for CSOs

According to our [preliminary analysis](#) drafted jointly with other CSOs and Concord, the NDICI-Global Europe does not yet appear to have facilitated access to funding for CSOs. Instead funding modalities and accessibility have been significantly reduced, including CSO opportunities under RMIP SSA. The majority of funding has been channelled through 'pillar assessed organisations' such as international organisations (IOs), namely UN agencies or EU Member States (EUMS) development cooperation agencies (such as AFD, GIZ, Enabel, etc).

According to the most up-to-date OECD official data (2021) on the flows of official development assistance (ODA) to and through CSOs, EU institutions channelled around 11% of the 2021 EU institutions ODA expenditure to CSOs. Of this amount, over half was allocated for CSOs' humanitarian response programmes. Only around USD 450 m (2% of the overall EU institutions' ODA expenditure in 2021) supported CSO work in other areas such as agriculture, food systems, education, climate adaptation, social services or environmental protection. An initial assessment of the adopted 2021 and 2022 annual action plans (AAPs) indicates that there is still little funding available for CSOs in such areas under the current Multiannual Financial Framework (MFF) and we are expecting another decline in funds available to/through CSO programmes, other than political advocacy and human rights work, in the coming years.

For example, under 2021 AAPs for the Sub-Saharan regional programme, indirect management by the EU MS or IOs represented around 63% of the allocated budget. It appears as if a large amount of the EU international cooperation budget is actually going back to EU MS agencies while progressively excluding CSOs from directly accessing EU funding. Many of these agencies do not have implementation capacity on the ground and as a result they further 'subgrant' or 'outsource' the work to CSOs.

In order to reinstate a more productive collaboration between the EU and the CSO community in the implementation of the RMIP SSA, DG INTPA must recognise the diversity of CSOs' expertise and operational capacity and enable CSOs to contribute to all NDICI-Global Europe geographic and thematic programmes.

**Specific and predictable funding allocations should be made available to civil society organisations under the RMIP SSA**, to safeguard civic space and enable CSOs' participation in the implementation of the global biodiversity, climate and green transition programmes. Many environmental CSOs have the operational and technical capacity to implement technically demanding multi-country and global programmes, as well as to carry out the research.

**The EU should consider alternative funding modalities to calls for proposals for CSOs if this poses major administrative and capacity challenges for DG INTPA or EU Delegations.** This could for example include:

- Transparent funding models that would allow **CSOs to access and manage large scale and longer term programmes**, similar to modalities available to pillar assessed organisations
- Requirement to include **CSO partners in consortia led by IOs** or EU MS agencies in case of indirect management or justify their exclusion
- **Long-term funding for diverse CSO actors** over the standard three years cycle and follow-up grants to organisations in case of positive project/programme evaluation.
- **Small granting schemes for local CSOs** under each country programme with simplified eligibility and compliance criteria. We would like to point out that even if Financial Support to Third Parties (FSTP) provides opportunities for local CSOs to access funding, there is also room for improvement of this modality, including making sure administrative costs of the sub-grantee and capacity building costs for the main applicant are systematically taken into account in the budget.

For more information, please see a joint CSO analysis of the funding trends under the NDICI.<sup>1</sup>

## **2. Biodiversity finance and support with the implementation of Kunming-Montreal Global Biodiversity Framework (KM GBF)**

The landmark commitment to halt and reverse biodiversity loss by 2030 was agreed at the CBD COP15 biodiversity conference in Montreal in 2022. The participating governments also committed to eliminate or reform subsidies harmful to nature and to increase financial support for conservation efforts by 2030, mobilising at least \$US200 billion from all sources per year. Whilst we welcome that the European Commission has increased its biodiversity spending under the NDICI and committed to spend €7bn on biodiversity-related projects during 2021 - 2027, the **EU will need to commit to a comprehensive finance and resource mobilisation strategy to generate a significant increase in funding for biodiversity to correspond to the needs**, including the resources allocated for the RMIP SSA.

Strengthening of capacity will be required at all levels of the partner countries in Sub-Saharan Africa. The EU Delegations should substantially and consistently increase support to partner governments to revise and implement their National Biodiversity Strategies and Action Plans (NBSAPs) to align them with the KM GBF and scale up technical assistance and capacity building to relevant ministries that are responsible for overseeing the sectors that drive biodiversity loss and associated harmful subsidies.

### **Recommendations for the EU:**

- **Redirect available financial resources** to support EU partner countries, in particular least developed countries in Sub Saharan Africa, to implement National Biodiversity Strategies and Action Plans (NBSAPs). EU support can specifically target building capacity for policy and regulatory reforms in partner countries to unlock domestic resources from the public and private sector. To operationalise this commitment and underpin it with the needed efficiency through increased policy coherence, the EU should support partner countries to develop National Biodiversity Finance Plans (NBFPs) to identify their current flows and finance needs, identify preferred mechanisms to close their national biodiversity finance gaps, including opportunities to eliminate or reform harmful subsidies and ways to leverage international cooperation.
- The revised RMIP SSA should **integrate biodiversity and its multiple values across all external programmes** and across all development cooperation sectors, in particular those with significant impacts on biodiversity, and enhance the role of collective conservation actions, including by Indigenous Peoples and community based natural resource management
- **Increase financial support for nature based solutions:** around 30% of the climate finance budget under RMIP SSA should be allocated for nature-based solutions (NBS) to contribute to the ODA related financial flows with co-benefits for biodiversity to developing countries. Given the overall RMIP SSA budget, this would send an important signal to the wider donor community for a comprehensive commitment from all donor countries.
- Take relevant policy measures to encourage and **enable private companies and financial institutions involved in the EU's investment framework for Sub-Saharan Africa** (EFSD+ and Global Gateway containing blending, guarantees, etc) to monitor, assess, and transparently disclose their risks, dependencies and **impacts on biodiversity and report on compliance with the KM GBF** in order to progressively reduce negative impacts on biodiversity and promote actions to ensure sustainable patterns of production and innovative schemes such as payment for ecosystem services, green bonds, biodiversity offsets and credits, with environmental and social safeguards.

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[https://www.wwf.eu/wwf\\_news/publications/?10127466/Funding-for-Civil-Society-Organisations-in-the-Neighbourhood-Development-and-International-Cooperation-Instrument--Global-Europe](https://www.wwf.eu/wwf_news/publications/?10127466/Funding-for-Civil-Society-Organisations-in-the-Neighbourhood-Development-and-International-Cooperation-Instrument--Global-Europe)

### 3. Implementation of the EU Deforestation law

The EU approved a landmark [deforestation law in May 2023](#) to stop products made from coffee, beef, soy, palm oil, timber and rubber being placed on the EU market if they are linked to the destruction of the world's forests. The law will require companies that want to sell goods on the European Market to produce a due diligence statement and "verifiable" information proving their goods were not grown on deforested land (risk assessment). The EU is tasked to engage in a coordinated approach with producer countries based on a "**comprehensive EU Strategic Framework**" which it must develop.

The MTR of the RMIP SSA is a sizable and timely opportunity to redirect and mobilise technical and financial resources required to support EU partner countries in Sub-Saharan Africa to comply with the new Regulation. The text of the Regulation provides some examples of what this could be, such as structured dialogue, and it mentions that "**relevant EU instruments shall be mobilised**" without stating however, how this is supposed to work. As the legislation will apply to large and medium sized companies from 30 December 2024 and to small and micro enterprises from 30 June 2025, the Strategic Framework should be finalised as soon as possible to be able to move to its concrete implementation, providing concrete opportunities to stakeholder in producer countries to address challenges at national level.

#### Recommendations for integration in RMIP SSA:

- Support development of **country impact studies for all relevant countries in Sub-Saharan Africa** to review the specific situation of the producing countries, potential impact, the level of risk for the producing country to comply with the regulation and mitigation/support measures and identify the most crucial needs/areas for immediate and long-term support.
- **Incorporate the Strategic Framework in RMIP SSA.** Sufficient financial and technical resources should be allocated for the implementation of the Strategic Framework to provide tailored technical assistance and funding. Efforts should focus on raising awareness of the Regulation among key actors including government, small-holder producers and civil society in producer countries and create a space for multi-stakeholder dialogue. It should also set out a broad framework to guide EU action regarding supply-side partnerships to help implement the new Regulation. The Strategic Framework should set out minimum objectives that all supply-side partnerships should aim to achieve, such as:
  - tackle underlying drivers of deforestation and human rights violations, including poor governance and law enforcement, weak legal frameworks and environmental regulations, uncoordinated actions across sectoral policies, lack of transparency in issuance of logging concessions and systemic small farmer and forester poverty in supply chains
  - assist producers to comply with the Regulation on deforestation-free products without creating a two-tier production model
  - support the transition to sustainable agriculture and forestry, including sustainable and resilient livelihoods that builds in nature-based solutions for the farmers and foresters involved.
  - strengthen the position and agricultural practices of smallholders so that they are not undermined by the geo-location and traceability requirements.
- If the Regulation is to become the global benchmark in the fight against deforestation, the EU must **put effective partnerships that are inclusive of all stakeholders and rights holders including indigenous peoples and local communities, at the heart of its international cooperation.** Such partnership agreements must include jointly developed roadmaps that create an enabling environment, improve governance, tackle deforestation and respect rights. Partnerships with producing countries will be the key to unlocking the Regulation's potential, from ensuring smallholders (including indigenous and local communities and women) don't bear the

financial brunt of the Regulation, to supporting producer countries to implement it, and preventing goods produced on deforested land from being sold on markets outside the EU.

- **Benchmarking** (putting different countries in the low, standard or high risk category). As the Regulation delves into the development of a Strategic Framework that aims to support countries, those countries that will be classified as high risk should have a priority to receive support from the Strategic Framework and they should be therefore prioritised for technical assistance under the RMIP SSA. The country benchmarking is important and the methodology should be based on scientific criteria and scientific data, which are available e.g. from FAO or Global Forest Watch. The risk assessment and benchmarking processes must adequately assess whether Indigenous Peoples and local communities' tenure rights are being respected.

#### 4. The EU's 2021 pledge to the Congo Basin's forests

In November 2021 at COP26 in Glasgow, the president of the European Commission announced a €1 Billion pledge over 5 years to global forests. Within this, €250 million was pledged for the Congo Basin, covering eight countries (Cameroon, Central African Republic, Democratic Republic of the Congo, Republic of the Congo, Equatorial Guinea, Gabon, Burundi and Rwanda) to protect the world's second largest tropical rainforest region while improving livelihoods of its populations.

Given the scale of needs, and the critical importance of the Congo Basin's forests, RMIP SSA needs to focus on an integrated approach which will:

- **Establish a sustainable forest trust for the Congo basin** to increase public finance for budget support and development policy financing.
- **Increase fiscal space** for the Congo basin countries to create incentives to conserve forests: Current IMF and World Bank lending programmes do not consider natural assets such as forests in countries' management debt frameworks. Considering the value of Congo Basin forests in fiscal assessments would create incentives to conserve forests, which could be combined with budget support and debt relief.
- **Stimulate investments in conservation:** issuing a forest bond linked to new payments for ecosystem services: A forest bond linked to environmental markets could help to raise private capital to finance forest conservation efforts and/or sustainable development projects.
- **De-risk private investment:** A Congo Basin Guarantee Facility (CBGF) could channel finance into deforestation-free supply chains and infrastructure investments.
- **Invest in pipeline development:** An Investment and Technical Assistance Facility (ITAF) for the Congo Basin region would have the opportunity to unlock private investments, narrow the carbon market finance gap and support the establishment of emerging environmental markets.
- **Attract foreign direct investment:** Strategic engagement with environmental markets would allow governments to approach carbon pricing holistically and consider carbon markets as part of their climate policy and sustainable development toolbox.

#### 5. NaturAfrica flagship initiative

The NaturAfrica approach is innovative, flexible, and responds to multiple crises simultaneously through partnerships with a variety of actors to support biodiversity conservation and socioeconomic development.

NaturAfrica phase 1 has focused on the creation of partnerships which best respond to its 3 pillars of territorial governance, conservation and green economy. However, these partnerships must also be in line with EU PRAG eligibility criteria for direct awards i.e. represent a monopoly, or be channelled through an international organisation. In some landscapes, it is difficult to demonstrate a de jure or de facto monopoly

or 1 operational lead organisation due to the sheer size and diversity of these landscapes which contain a plethora of different land uses and actors, such as the Kavango-Zambezi (KAZA) landscape. In other cases, the monopoly holder is clear, but it is difficult to get the players to break out of their traditional silos and work together in a multi-stakeholder approach at landscape level - especially in complex and fragile contexts which characterises the bulk of the Congo Basin biome.

### Recommendations:

- It is relevant to continue using a direct award modality for the bulk of NaturAfrica grants. The 'start-stop' reality of smaller scale and shorter grants funded by call for proposals is not an effective modality to build the right implementation set-ups to respond to the long-term challenges of conservation. However, given there is not always a clear process to advertise direct award opportunities and identify the recipient, direct award processes tend to be opaque and mired in misunderstandings. Indeed, phase 1 of NaturAfrica has demonstrated that it is not always easy or obvious to combine the right set of actors in a consortium that is fit for a direct award. **It would be useful for the EU Delegations to foster collaboration between public, private, IO, and civil society organisations according to certain topics (logging, cotton, cacao) to transparently advertise existing NaturAfrica direct award opportunities to stimulate a better understanding amongst these actors of these opportunities, what type of consortium is required to access a direct award,** how NaturAfrica funding could be channelled to a multistakeholder consortium (made up for example of an IO, a public entity, a private sector actor, a CSO) and how each different type of actor would reap different benefits
- Similarly, there seems to be some resistance to NaturAfrica on the part of certain national and regional public actors across Sub-Saharan Africa. **It would be useful for the EU to invest in ensuring a strong understanding of NaturAfrica by these actors, who are key to the success of NaturAfrica.**
- Currently, NaturAfrica regional funding is foreseen as a top-up envelope to complement what has already been prioritised at national level. This means that the regional envelope can only truly be designed once national NaturAfrica funding has been designed. In addition, regional funding depends on the signature of regional financing agreements with each of the relevant regional bodies in each biome. In certain cases, the process to obtain the signature is slow. As such, there is a delay in the identification of partners and the roll-out of regional NaturAfrica funding. While this is the first phase of NaturAfrica, and inception delays while the different actors get used to the new approach are to be expected, there is the risk that uncontracted funds will be returned to the regional Sub-Saharan MIP and be allocated to another priority, rather than re-allocated to phase 2 of NaturAfrica funding. **It is recommended that any undisbursed NaturAfrica funds from phase 1 be transferred to phase 2 NaturAfrica to make up for the delays in the roll-out of this new approach.**
- While there is ambition to work at landscape level, the reality remains that territorial mandate holders tend to prioritise their core work (for example, protected area management) and do not necessarily see their organisation as being the 'lead operator' in a given landscape; or that some landscapes are too big for there to be one credible lead operator and are thus broken down into their national component sub-landscapes (Kafue landscape within KAZA for example). While this is understandable and effective, the risk is that the broader landscape level logic is lost. **It may be interesting for these larger landscapes, such as KAZA, to focus on a few key thematic areas that make sense at scale (such as water management and critical corridors for connectivity), and keep the rest of the funding for national sub-landscapes to be managed by the respective national EU Delegations.**
- In some landscapes, the obvious lead operator would be a public entity. However, in some cases, these public actors have weak capacity that could potentially hamper implementation. It would be useful if NaturAfrica funding could be designed to respond to the outlined NaturAfrica



objectives whilst simultaneously supporting the capacity of some of these national/regional institutions that pass some sort of due diligence (NRT in Kenya, intergovernmental KAZA, SADC and Greater Limpopo secretariats, community conservancies in Namibia, etc.). This would enhance the number of players with capacity to implement NaturAfrica relevant projects, while fostering sustainability through increased ownership and institutional capacity

- Protected area management is frequently referred to as a public private partnership. The reality, is that the private side of it is frequently weak and requires significant additional grant funding to be developed sufficiently for it to provide alternative income streams for both the people living in the periphery, or for the park management entity itself to reduce its dependency on grant funding (infrastructure for eco-tourism, development of roads for tourism, development of roads and electricity for green economic development in the periphery, etc.). To be meaningful, these initial capital investments need to be significant. **It would be impactful if NaturAfrica could use the EU's Team Europe Initiative approach to i) generate additional interest from EU member states development agencies to ensure sufficient funding to kick start these conservation-friendly economic opportunities in its pre-selected landscapes; ii) the EU considered investing in project finance for permanence to develop sustainable financing for landscapes**

#### **6. Priority 3: Green transition, Objective 3. Support the transition towards more resilient and sustainable aquatic and agri- food systems (including for more affordable and healthier diets)**

So far, an Annual Action Plan (AAP) has been published for pastoral economies and the Great Green Wall flagship initiative. However, actions under Objective 3 to support other results are yet to be published. As such, it is difficult to assess progress to date. In absence of this, we would like to formulate the following recommendations:

- **Support the development of a nature-positive framework in high value conservation areas:** We acknowledge that the EU has been a great supporter of agroecology. It is important to note that appropriate agroecological approaches differ across landscapes. For areas surrounding high value conservation areas, nature-positive approaches allow for farming while at the same time protecting intact natural ecosystems and supporting restoration, which is aligned to the EU deforestation law. We encourage the EU to support the development of a nature-positive framework, especially for countries and landscapes where farming is occurring around high value conservation areas. This includes tackling potential run-offs across the agricultural value chain (such as cultivation, processing and packaging) into soil, freshwater and oceans. In addition, there is a need to incentivise farmers and value chain actors to apply agroecological practices, and to increase financial flows and investments towards agroecological production systems and markets.
- Many African decision-makers are stuck within green revolution pathways, and it will take robust transdisciplinary and multistakeholder research and investment to convince them of the need for an agroecological transition. **Further evidence is needed to inform Africa's leaders on the connection between their policy and investment pathways and the impacts on Africa's ecological food future.** Both research organisations and CSOs have developed such evidence and are using it to advocate for policy shifts.
- During COP27, a decision on the [joint work on implementation of climate action on agriculture and food security](#) was reached to support both adaptation and mitigation actions in agriculture and food systems. However, countries in Sub-Saharan Africa have yet to begin implementing the recommendation. **We encourage the EU to build capacities of African institutions, including CSOs, to implement work related to climate action on agriculture and food security.**

- Ongoing climate change impacts in Sub-Saharan Africa, resulting in significant food insecurity, show an urgent need for adaptation actions. This includes short-term (especially in cases where lives must be urgently saved), medium-term, and long-term actions. **Adaptation actions should focus on the food-water nexus**, ensuring both food and water security are addressed in an integrated manner<sup>2</sup>
- To promote sustainable agrifood markets, RMIP SSA should support domestic food products that are intended for local consumption in Africa. To date, certification has mainly been applied to food products targeting EU markets. The need to address healthy people and healthy ecosystems should see the **EU invest in supporting certification and food safety actions for domestic food products in Sub-Saharan Africa**.
- As mentioned above on the CSO funding modalities, based on the pillar assessed entities receiving the funding for this priority area, we would welcome **clarity on how CSOs can work with these organisations, and be able to actively input on the design of these programmes** which are frequently disbursed through indirect management or potentially have a specific grant that allows CSOs to be part of the priority area.
- The challenge of access to adequate water by farming communities throughout the season remains the biggest challenge to productivity in Africa. **An integrated water resource management that entails management of water flows, soil water and rainwater harvesting must be coupled with promotion of the right technologies and behaviour change actions**.
- To deliver on the transition towards more resilient and sustainable aquatic and agri-food systems (including for more affordable and healthier diets) the current RMIP SSA states its contributions to agri-food systems, which are said to include aquatic food. Yet, commitments largely focus on terrestrial and agricultural systems. **It is relevant to include specific deliverables relating to aquatic food systems**. This includes - but is not limited to - harnessing the role of small-scale fisheries (SSF), whilst ensuring that the fishing sector as a whole does not engage in harmful fishing practices and that wild fish populations are allowed to recover instead of applying the principle of maximum sustainable yield (MSY). As is the case for agri-food, value chain strengthening is relevant for SSF. Cold chains are essential to reduce food waste and improve the income of coastal communities engaged in fishing. Whereas alternative income streams are also required to increase spending power of households and to avoid the current unsustainable pressure on wild fish populations. The aquatic food sector is subject to climate shocks such as rising water temperatures. As such, resilience and mitigation efforts should include communities and stakeholders involved in this sector. We welcome the EU's commitment to target networks of small-scale fisheries sectors to strengthen their capacity in service delivery and in advocacy.

## 7. Inclusion and participatory approaches

We welcome the EU's commitment to principles to "leave no-one behind", gender equality, youth involvement, and addressing inequality across all international cooperation programmes. To help advance this in RMIP SSA, more explicit measures can be taken, such as (not exhaustive):

- Under 2.1.1 of the RMIP for instance (the objectives for Human Development), it would be relevant for the RMIP to specifically mention inclusion of skills-building to deliver on the Green Transition as well as sustainable livelihoods, particularly for communities most vulnerable to the effects of climate change and biodiversity loss.
- Furthermore it would be good for the EU to help partner countries in Sub-Saharan Africa to facilitate increased access for rural and coastal communities (including girls).

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<sup>2</sup> See a [scoping study by WWF on Umba River](#), a transboundary river between Tanzania and Kenya, results indicate how anthropogenic drivers impacts water availability and the ultimate impacts on agriculture, a situation exacerbated during climate extremes.



- Similarly under 2.2.1-2.2.2 (objectives and results for Democratic Governance Peace and Security, and Culture) it is encouraging to see that the EU is advancing inclusion and participatory processes, and that it mentions organised crime such as illicit extraction of minerals. It would be relevant to make explicit reference to (i) the rights of Indigenous Peoples and Local Communities (IP/LC), (ii) wildlife crime, and (iii) Illegal, unreported and unregulated (IUU) fishing.