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# ABBREVIATIONS AND ACRONYMS

<b>CSO</b>	Civil Society Organisation
<b>DG ECHO</b>	Directorate-General for European Civil Protection and Humanitarian Aid Operations
<b>DG INTPA</b>	Directorate-General for International Partnerships
<b>DG NEAR</b>	Directorate-General for Neighbourhood and Enlargement Negotiations <sup>1</sup>
<b>EC</b>	European Commission
<b>EIB</b>	European Investment Bank
<b>EUD</b>	European Union Delegation
<b>EU</b>	European Union
<b>FR</b>	Financial Regulation
<b>GG</b>	Global Gateway
<b>MAAP</b>	Multi-Annual Action Plan
<b>MFF</b>	Multiannual Financial Framework
<b>MTR</b>	Mid-term Review
<b>NDICI - Global Europe</b>	Neighbourhood, Development and International Cooperation Instrument
<b>ODA</b>	Overseas Development Aid
<b>TEI</b>	Team Europe Initiative

<sup>1</sup> Since 1 February 2025, the Directorate-General for the Middle East, North Africa and the Gulf (DG MENA) and the Directorate-General for Enlargement and Eastern Neighbourhood (DG ENEST) have taken over DG NEAR's responsibilities.

# GLOSSARY

Terms used to describe the European Commission's funding relationships	
<b>Budget support</b>	European Union (EU) funds are transferred directly to a partner country's national treasury to support the implementation of its policies and reforms. Disbursements are made once agreed conditions and performance indicators are met, promoting country ownership, policy dialogue and alignment with national systems.
<b>Direct management</b>	EU funds are implemented directly by the European Commission, through its own departments (Commission Headquarters, EU Delegations, or executive agencies). The Commission remains solely responsible for all stages of the budget cycle – programming, contracting, payments, controls, and audits – using the EU's internal rules on grants, procurement, prizes, and financial instruments. It is the standard form for actions financed under Articles 62(1)(a) and 125–149 of the Financial Regulation (FR). Typical examples include: <ul style="list-style-type: none"> <li>– Calls for proposals and procurement procedures managed by the Commission or executive agencies (e.g. INTPA, NEAR);</li> <li>– Contracting of implementing partners (CSOs, public bodies, firms, etc).</li> </ul>
<b>Entrusted entities</b>	A person or entity to which the Commission entrusts budget implementation tasks for a given action under indirect management (per Article 62(1)(c) FR). Being entrusted is a contractual/operational status created by a contribution/financing agreement; it is not a label in itself about systems quality. As a rule, before the Commission can rely on an entity's own systems to implement EU funds, it must have a positive pillar assessment on the relevant pillars (per Article 157(3) – (4) FR). The pillar assessment informs the Commission's decision as to whether it can entrust budget implementation tasks to the entity. Entrusted entities are therefore those to which the Commission has actually delegated tasks following a positive pillar assessment.
<b>Financial regulation</b>	The EU Financial Regulation (FR) is the core legal framework governing how the EU budget is planned, spent, controlled, and audited. It sets out the principles of sound financial management, defines the roles and responsibilities of the Commission, Member States, and implementing partners, and lays down the rules for grants, procurement, financial instruments, budget support, audits, reporting, and anti-fraud measures. The most recent Financial Regulation is the Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 29 February 2024.
<b>Indirect management</b>	EU funds are implemented by another organisation ("entrusted entity") on behalf of the European Commission (EC), under its overall responsibility. The Commission delegates budget-implementation tasks (e.g. contracting, payments, monitoring) to the entity but retains final accountability for legality and regularity. The entrusted entity may apply its own rules and procedures, provided these have been verified as equivalent through a positive pillar assessment (Articles 62(1)(c) and 157 FR).

**Pillar-assessed organisations**

An organisation that belongs to the categories eligible to implement EU funds under indirect management (the entities listed in Article 62(1)(c) FR) and that has successfully passed the Commission’s “pillar assessment” (an ex-ante audit of systems). The pillars cover internal control, accounting, independent external audit, and the rules for grants, procurement, financial instruments, plus exclusion, publication of recipients, and data protection (see Article 157(4) FR). Passing the relevant pillars allows the Commission to rely on the entity’s own rules when entrusting EU funds. Typical candidates include international organisations (e.g. UN agencies), the EIB Group and other development banks, Member State organisations/agencies, and public-law bodies in partner countries—i.e., the types listed in Article 62(1)(c) FR.

**Other terms used in the current report**

**Non-assessable funds**

Budget spent through specific modes (indirect management) or modalities (procurement, contingencies, evaluations) which do not allow for an analysis of funds going to or through CSOs.

**Funds that are exclusively reserved for CSOs**

Budget explicitly and exclusively going to or through CSOs (through calls for proposals and direct awards).

**Funds that are partially or possibly accessible for CSOs**

Budget spent through calls for proposals and direct award procedures for which CSOs are eligible but compete with other stakeholders (public institutions, Member State agencies, universities, etc).

**Funds that are inaccessible for CSOs**

Cumulative amount of funding spent through (i) specific modalities which exclude CSOs (budget support, twinning) and (ii) calls for proposals and direct award for which CSOs are explicitly ineligible.

# EXECUTIVE SUMMARY

EU development cooperation is evolving in a context marked by geopolitical pressures, investment-driven approaches, and changing expectations about how international partnerships should be designed and delivered. A shift towards a stronger geographic focus, increased reliance on indirect management through pillar-assessed organisations, and the growing prominence of large-scale initiatives such as Global Gateway are reshaping the architecture of EU external action, with implications for all actors.

Building on the first edition of *The Lion's Share*, published in 2023, this second edition expands the scope of the analysis and updates the evidence based on a larger set of programming documents covering the period 2021–2025. The report draws on an **extensive review of EU external action programming documents representing EUR 26.4 billion across both thematic and geographic envelopes**. While the first edition provided an initial assessment of how EU external action funding reaches civil society organisations under NDICI–Global Europe, this second volume examines **whether the trends identified at the early stage of implementation have persisted as the instrument has matured**. Importantly, the report does not seek to assess **the overall volume of EU funding allocated to civil society organisations**. Rather, it **focuses on how funding is structured and implemented, and on the conditions under which civil society organisations can access and participate in EU external action programmes**.

The analysis draws exclusively on **publicly available and traceable budgetary data** published by the European Commission and is therefore limited to what can be independently verified through official sources. While this approach does not capture the full volume of EU external action spending, it serves two important purposes. First, it provides a robust indication of emerging funding trends based on verifiable data. Second, it shows the **degree of transparency — or lack thereof — faced by external stakeholders**. Where funding cannot be assessed, neither civil society nor the

public can determine whether, how, or to what extent CSOs are financially supported.

Beyond individual funding figures, the analysis highlights a broader transformation in how EU external action funding is structured and channelled. Management modes and the scale of funding and programmes increasingly shape which actors are able to participate as implementing partners.

**Indirect management now dominates, accounting for 62% of the analysed budget.** In practice, this results in funds being channelled through pillar-assessed organisations which then decide how and whether funding is passed on to other actors. For **70% of the reviewed funding**, there is no publicly available information to assess whether any resources are meant and ultimately reach CSOs. **Only 10% of the reviewed envelopes is explicitly reserved for CSOs**, while a further **9% is potentially accessible, with CSOs competing with a wide range of other actors**. As a result, civil society access to EU external action funding is shaped not only by eligibility criteria but also by the way funding is structured and implemented. This results in narrow and uncertain entry points for civil society within the overall funding landscape.

Thematic programmes **remain the most reliable source of funding for CSOs**. They are more transparent and significantly more accessible than geographic programmes, with 26% of thematic funding explicitly reserved for civil society. However, their scope is limited. The focus of these programmes remains concentrated on areas such as human rights, civic space and governance, which, while essential, restrict CSOs' engagement and contribution across the broader range of EU external action priorities.

These findings are consistent with the EU's broader shift towards investment-oriented financing, blended finance and partnerships with pillar-assessed entities to increase scale, speed and geopolitical impact. While the overall architecture of EU external action has evolved,

funding mechanisms for CSOs have not adapted accordingly. Civil society continues to be largely confined to traditional, project-based calls for proposals, even as geographic programmes—where access for CSOs is most constrained—absorb the largest share of programmable resources.

Civil society is not a homogeneous group, yet EU external action regulations and funding modalities often treat CSOs as a single category. In practice, civil society actors engaged in EU external action span a wide and diverse range of organisations, including local and community-based organisations, human rights and environmental defenders operating in highly constrained contexts, national organisations and networks, as well as international civil society organisations. While these actors fulfil different roles — ranging from advocacy and knowledge production to service delivery and programme implementation — they collectively bring local presence, contextual knowledge, technical expertise and long-term engagement that contribute significant added value to EU external action. By failing to translate this diversity of roles, capacities, and contributions into funding modalities that are adapted and effective, current funding frameworks limit the EU's ability to engage with civil society in line with the objectives of its external action.

Crucially, **there are no ring-fenced allocations or guarantees of predictable funding for civil society within geographic programmes.** The growing emphasis on private-sector engagement, large-scale grants to pillar-assessed entities, and geopolitical objectives risk further marginalising CSOs from direct access to EU funding. **This trend risks reducing CSOs to consultation or dialogue partners, rather than recognising them as independent actors with a right of initiative and a proven capacity to deliver results.** Without safeguards to secure predictable and accessible funding channels, meaningful CSO participation in EU external action may become increasingly constrained. As the EU prepares the next Multiannual Financial Framework and a new Global Europe instrument, the focus should be on whether the funding architecture evolves to sustain meaningful participation by all partners. Strengthening transparency, access

to funding channels, and the conditions for CSO engagement will be critical if the EU is to uphold its commitments to an open and pluralistic civic space, community-led and rights-based development, and effective, inclusive international cooperation.

The following recommendations set out concrete steps to ensure that civil society organisations are recognised and supported as equal partners in EU external action.

## 1. Make funding for civil society organisations a rule, not an option.

Establish a minimum share of EU external funding for implementation by CSOs, ensuring predictable space and dedicated resources for CSOs as part of the EU's external action. This should reflect their proven capacity to deliver impactful, inclusive and sustainable results, and to drive locally-led development through the programme cycle.

## 2. Guarantee direct and equitable access to EU funding for diverse civil society organisations.

Adapt EU funding rules, procedures and grant volume to reflect the diversity of CSOs in terms of size, capacity, and operating context, ensuring proportionate and equitable access for CSOs so that local and community-based organisations can participate effectively.

## 3. Ensure transparency, accountability and traceability across the EU's external action funding architecture.

Publish complete, timely and disaggregated data on all EU external funding, including second-level recipients under indirect management, and include dedicated filters to identify funding allocated to CSOs.

# 1. INTRODUCTION

One year after the Mid-Term Review (MTR) of the EU's 2021-2027 Multi-Annual Financial Framework (MFF)<sup>2</sup>, EU external action is operating in a context that differs from that envisaged at the time of its adoption. Since 2021, implementation has been shaped by geopolitical and financial pressures, the growing prominence of investment-oriented approaches and cooperation frameworks such as the Global Gateway strategy and Team Europe approach. These developments reflect broader choices about how EU external action adapts to a changing global environment, and they have translated into concrete shifts in programming priorities, implementation modalities and budget allocation.

The NDICI–Global Europe regulation<sup>3</sup> provides a clear legal basis for the EU's engagement with civil society. It recognises CSOs as key actors in development cooperation and commits the EU to supporting their role, protecting civic space, and ensuring their involvement across the policy and programme cycle. However, recent policy frameworks, notably the 2021 Joint Communication on Global Gateway<sup>4</sup> - provide limited clarity on the role of CSOs as implementing actors or on the funding modalities through which their participation would be supported. This evolving positioning raises questions about how CSOs are supported in practice, and whether funding modalities provide them with predictable and meaningful opportunities to contribute to the EU's external action.

The MTR of the MFF confirmed that evolving political and budgetary priorities were already influencing the implementation of NDICI–Global Europe. In particular, it led to reallocations under Heading 6 towards investment-oriented instruments, large-scale facilities and initiatives linked to Global Gateway, alongside an increased reliance on indirect management through pillar-assessed entities. These trends do not in

themselves preclude civil society engagement, but they shape the conditions under which CSOs can access funding and the roles they are expected to play.

This second edition of *The Lion's Share* examines how these dynamics are reflected in EU external action funding under NDICI–Global Europe. It focuses on how resources are channelled through different modalities, and on what this means for CSO access — both as implementing actors and as contributors to policy dialogue. The analysis concentrates on **how the funding architecture functions in practice**.

The report aims to support the discussions on the implementation of the current NDICI–Global Europe and the preparation of the next MFF, by providing an evidence-based report of CSO access to EU external action funding, and by contributing to ongoing reflections on how EU external action can remain equitable, inclusive and transparent while cooperation models continue to evolve.

<sup>2</sup> <https://www.consilium.europa.eu/en/policies/mid-term-revision-of-the-eu-long-term-budget-2021-2027/>

<sup>3</sup> <https://eur-lex.europa.eu/eli/reg/2021/947/oj/eng>

<sup>4</sup> EC and HR/VP. 2021. Joint Communication to the European Parliament, the Council, the European Economic and Social Committee, the Committee of the Regions and the European Investment Bank, The Global Gateway. Brussels: European Commission.

## 2. METHODOLOGY

This study analyses CSO access to EU external action funding under the NDICI–Global Europe instrument, based on a review of **publicly available and traceable budgetary information** published by the European Commission and other official EU sources. The approach is consistent with that used in the [first edition of \*The Lion's Share\*](#) and reflects the level of transparency currently available to external stakeholders.

The analysis draws on a review of **787 publicly available EU action documents**, including Multi-Annual and Annual Action Plans **across geographic and thematic programmes, representing a total of EUR 26.4 billion programmed between 2021 and mid-2025**. The study covered data from all available documents and aimed to obtain a representative **sample of 40 countries** for which all available country-level action documents were included. These documents were coded to identify funding modalities, management channels, thematic priorities and the extent to which CSOs are explicitly **referenced as target actors or eligible implementers**.

Complementing the dataset, **19 semi-structured interviews** with key stakeholders, including EU Delegation staff, CSO representatives, and Member State cooperation agencies, were conducted to contextualise the findings and to inform how we interpret the implementing modalities and CSO accessibility under NDICI–GE.

A detailed explanation of the analytical framework, coding process and data limitations is provided in the methodological note included in the annex.

# 3. KEY FINDINGS

This section presents the main findings from the analysis of CSO access to EU external action funding under NDICI–Global Europe. The findings are primarily based on a quantitative review of EU programming documents and are complemented, where relevant, by qualitative insights into implementation practices and funding modalities.

## 3.1 The architecture of EU external action funding

This section sets out the dominant management modes and implementation channels through which NDICI–Global Europe funding is programmed, as a first step in assessing how CSO access to funding is shaped in practice.

Figure 1: Overview of the budget analysed in EUR billion by management modes

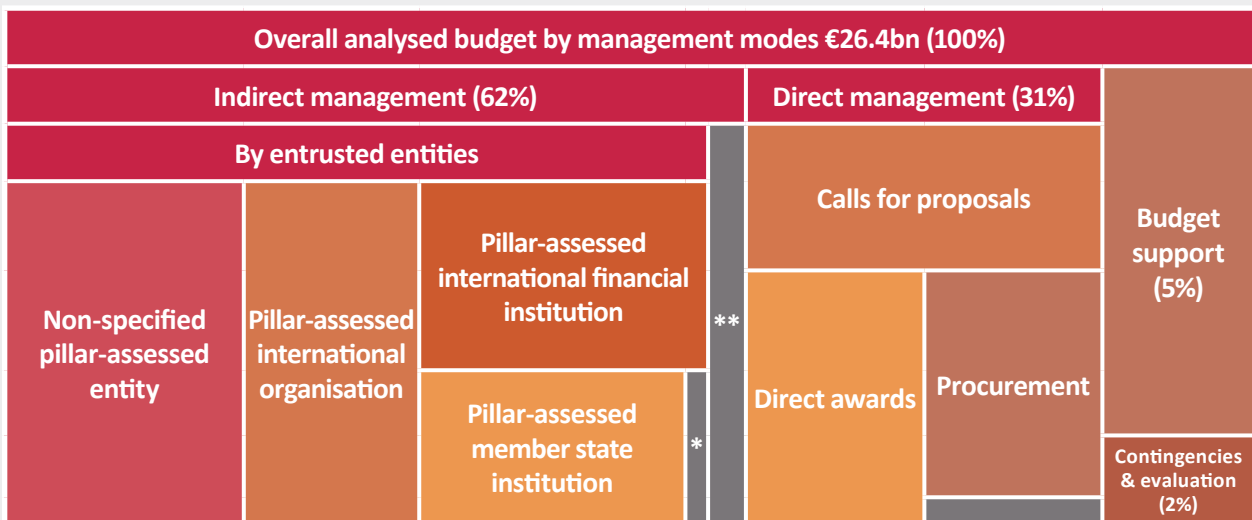
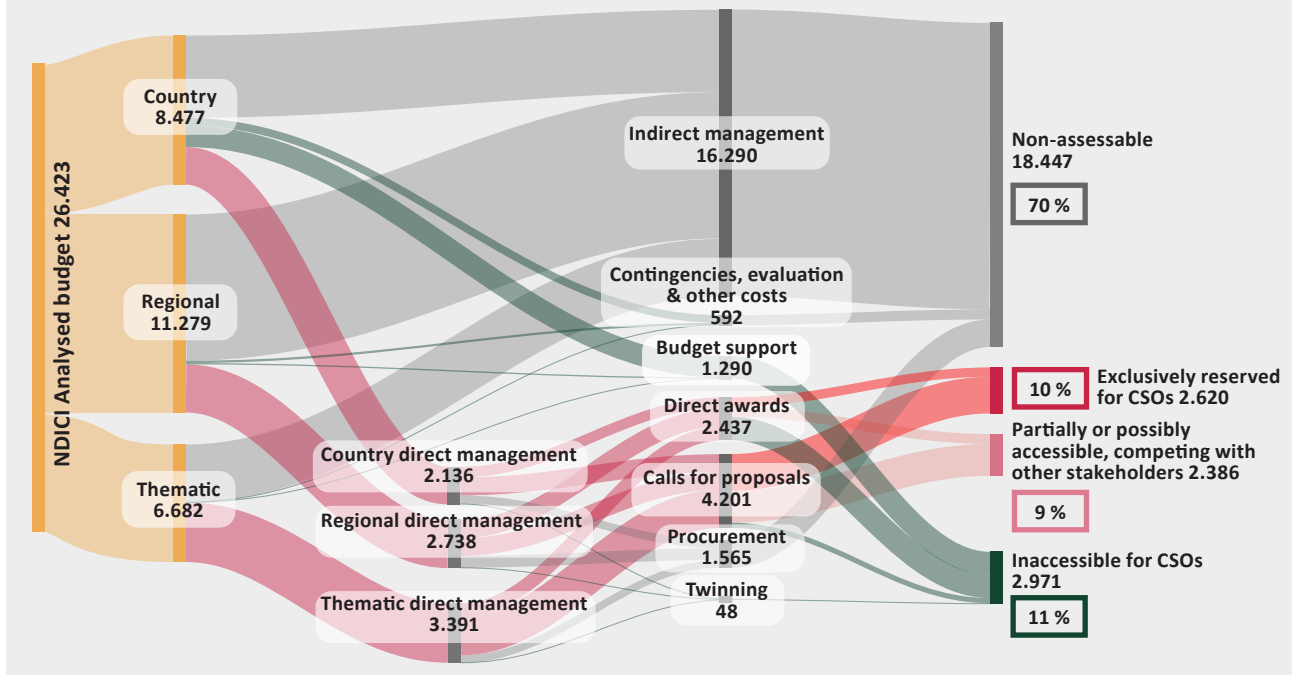


Figure 1.1: Overview of the distribution of the analysed budget in EUR billion

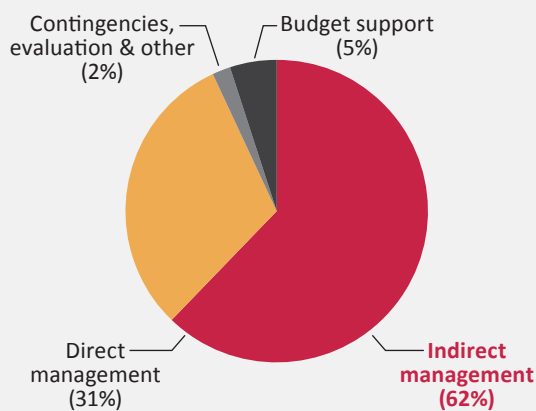


### 3.2 Indirect management dominates EU external action funding

#### Implications for transparency and CSO access

The extended and updated study finds and confirms that the large majority (62%) of NDICI-Global Europe funding analysed is managed through “indirect management”, meaning that the EU heavily relies on delegating budget implementation tasks to pillar-assessed organisations<sup>5</sup>. Less than one third (31.3%) is spent through direct management, excluding budget support. Budget support and envelopes for contingencies, evaluation and other costs (considered separately from direct management) do not appear as primary channels for funding, although it must be noted that budget support is heavily used to provide direct financial support to Ukraine.

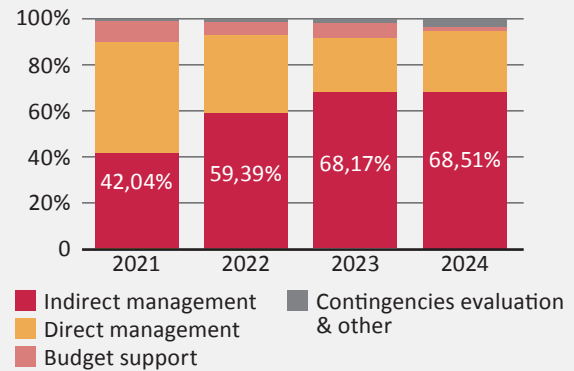
**Figure 2: Distribution of the budget in % by management modes**



The share of indirectly managed funds increased over time, still relatively low in the early phase of the implementation of the current MFF, starting at 42% in 2021 and increasing to 68% in 2024 (as very few action documents were available in May 2025, the 2025 figures are excluded from

time comparisons). In 2021, the share of directly managed funds almost reached 48%.

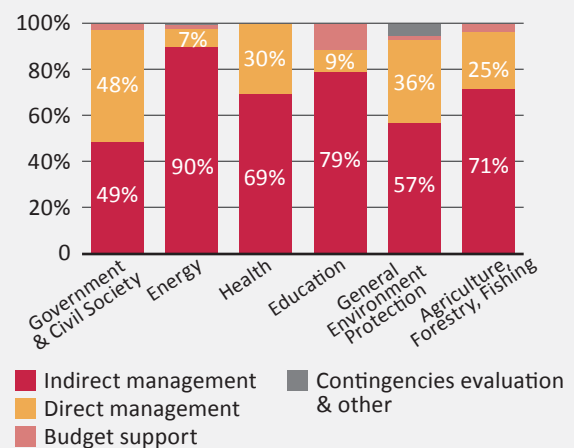
**Figure 3: Distribution of the budget in % by management mode and by year (2021-2024)**



The share of indirectly managed funds varies according to different scopes of the actions.

The distribution of the reviewed budget across sectors shows that the largest allocations go to Government and civil society (EUR 8.56bn), Energy (EUR 2.46bn) and Health (EUR 2.43bn). Among the three key sectors, management modes are applied very differently: Government and civil society funds are almost equally managed directly (48%) and indirectly (49%), whereas in the sectors of Energy and Health, indirect management is the primary implementation mode (90% and 69% respectively).

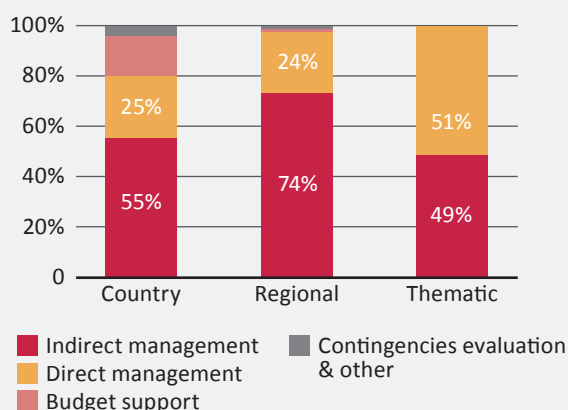
**Figure 4: Distribution of the budget in % by management mode and sector**



5 EC/DG INTPA (2021), *Annexes to the Annual Activity Report*: “Tasks carried out by entrusted entities include the following: managing and enforcing the contracts concluded (making payments, accepting or rejecting deliverables, enforcing the contract, carrying out checks and controls, recovering unduly paid funds), and also running the procurement and grant procedures preceding the conclusion of such contracts, including the award and rejection decisions.” p.549.

As part of the geographic pillar actions, more than half of the budget analysed is indirectly managed accounting for 74% of regional actions and 55% of country-level actions. By contrast, thematic programmes are the only ones where direct management slightly exceeds indirect management. Figure 5 below furthermore shows that country-level actions are managed in a more tailored way, through a greater diversity of instruments including budget support and contingencies deployed by the delegations at national level.

**Figure 5: Distribution of the budget in % by management mode and by scope**



The growing reliance on indirect management raises two fundamental concerns for civil society: transparency and access. First, under the EU Financial Regulation, civil society organisations cannot be entrusted with budget implementation tasks under indirect management.<sup>6</sup> This structurally excludes CSOs from acting as direct implementing partners when this modality is used. Second, entities entrusted with indirect management operate with limited public transparency regarding their funding decisions and downstream allocations. As a result, it is often impossible to assess whether, how, or to what extent these entities support CSOs.

Taken together, these factors make indirect management a “black box” for civil society organisations seeking to contribute to the EU’s response to global challenges. This lack of visibility and access raises questions about compliance

with the NDICI–Global Europe Regulation, as well as with the EU’s stated commitments to inclusive partnerships, transparency and mutual accountability.

More broadly, there is no comprehensive publicly available list of “pillar-assessed entities” or “entrusted entities”, nor clear guidance from the EU on whether or how these entities are expected to engage with, partner with or financially support CSOs. Despite this overall lack of clarity, the analysis of programming documents nevertheless identifies a number of notable practices under indirect management, which are outlined below:

- Only 9% of the reviewed documents explicitly mention sub-granting to CSOs. Indications of CSOs as indirect beneficiaries through indirect management typically appear in actions in the sectors of Reconstruction Relief and Rehabilitation (33%), Emergency Response (20%) and Government and Civil Society (15%). They are more common in country-level documents (14%) than in regional (3%) or thematic (4%) actions.
- 15% of the action documents using indirect management refer to the capacity or previous experience in collaborating with civil society as a criterion for the selection of implementing organisations. This is once more common at country level where 20% of the documents mention such criteria.

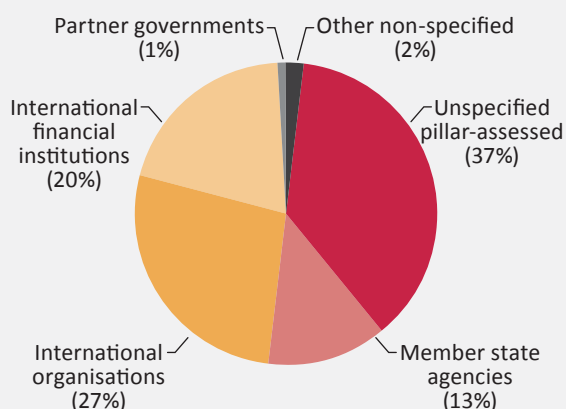
Figure 6 highlights a **critical transparency constraint within indirect management**. More than one third of indirectly managed funding is channelled through entities referred to only as “pillar-assessed” or “entrusted”, without further specification of the implementing organisation at programming stage.

This practice limits the traceability of EU external action funding and makes it difficult to assess who ultimately implements EU-funded actions and under what conditions. While the use of broad categories may allow for flexibility at the programming stage, the predominance of non-specified implementing partners significantly constrains external scrutiny and accountability.

<sup>6</sup> As per the EU Financial Regulation, organisations eligible for an assessment include “Bodies governed by private law with a public service mission”, which does not apply to CSOs.

As a result, the EU’s ability to demonstrate how funding actually reaches different types of actors is weakened and increases the high share of non-assessable funding identified elsewhere in the analysis.

**Figure 6: Distribution of the indirectly managed budget in % by implementing partners**



### 3.2.1 Only 10% of the analysed budget is earmarked for CSOs

**Only 10% of the analysed NDICI–Global Europe budget is explicitly earmarked for civil society organisations.** Of the total funding reviewed in this study, only 30% can be assessed in terms of CSO access. Within this assessable share, approximately one third is reserved for CSOs. When measured against the total analysed budget, this corresponds to just 10%.

The remaining 70% of funding cannot be assessed in terms of whether, or to what extent, resources reach civil society. This does not imply the exclusion of CSOs, but it does prevent verification of access and limits accountability. As a result, only a small and clearly identifiable share of EU external action funding can be said to support civil society in a predictable and traceable manner.

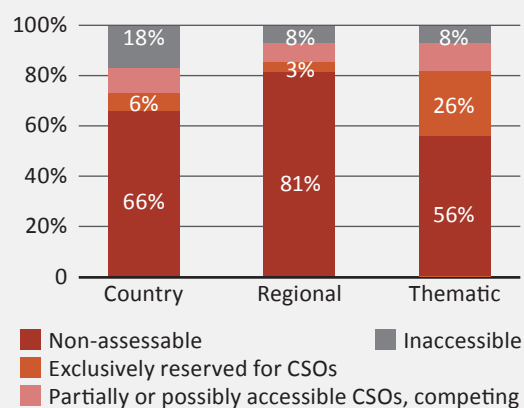
Table 1 provides a breakdown of the EUR 7.9 billion of funding for which CSO accessibility can be assessed.

**Table 1: Accessibility of funding for CSOs**

	Amount assessable (EUR billion)	Share of assessable funds	Share of total budget
Exclusively reserved for CSOs	2.62	32.8%	9.9%
Potentially accessible for CSOs	2.386	29.9%	9.0%
Not accessible for CSOs	2.971	37.2%	11.3%

Looking beyond aggregate shares, accessibility for civil society varies significantly depending on the type of programme through which funding is channelled.

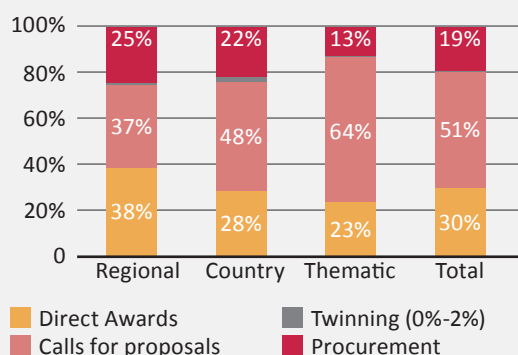
**Figure 7: Distribution of the budget in % by accessibility and by scope**



**Figure 7 shows that funding explicitly reserved for civil society is heavily concentrated within thematic programmes, while access through country and regional programmes remains extremely limited.** Although geographic programmes absorb the largest share of NDICI–Global Europe funding, they account for only a marginal proportion of CSO-accessible resources. This imbalance confirms that, in practice, civil society access is structurally tied to a narrow set of thematic instruments, rather than being embedded across the EU’s broader external action architecture.

Within the funding that can be assessed, access for civil society organisations is shaped not only by eligibility criteria but also by how funding mechanisms and procedures are designed. Under direct management, competitive calls for proposals remain a key access channel for CSOs accounting for just over half of directly managed funds.

**Figure 8: Direct management budget in € M by sub-modality and scope (excl. budget support)**



However, these calls are generally built around uniform administrative, financial and compliance requirements that do not sufficiently reflect the diversity of civil society actors and their different operating models.

In practice, the consolidation of activities into single calls with multiple lots may reduce transaction costs for EU delegations, but it also narrows entry points and increases competition within a limited number of funding opportunities. This can constrain the ability of a wide range of CSOs, particularly those working at local or community level, to engage meaningfully, not because of a lack of capacity, but because funding instruments are not tailored to different organisational realities. The current framework therefore reveals a structural tension: while it seeks to ensure openness through competition, it relies on standardised grant mechanisms that are insufficiently adapted to the diversity of organisations the EU seeks to support.

The principal constraint identified in the dataset remains traceability. A substantial **70%** of the analysed NDICI–Global Europe budget is non-assessable in terms of whether, or to what extent, funds reach CSOs, which the report notes is consistent with the previous Lion’s Share edition. This does not imply exclusion of CSOs, but it prevents verification of access and limits accountability over who benefits downstream. Improving traceability under indirect management—particularly with respect to sub-granting and final recipients—would strengthen the credibility of EU partnership commitments and allow a more reliable assessment of CSO involvement.

### 3.2.2 Thematic programmes: where CSO access still exists

A closer look at the thematic programmes sheds light on how CSOs can access EU funds. There are four thematic programmes:

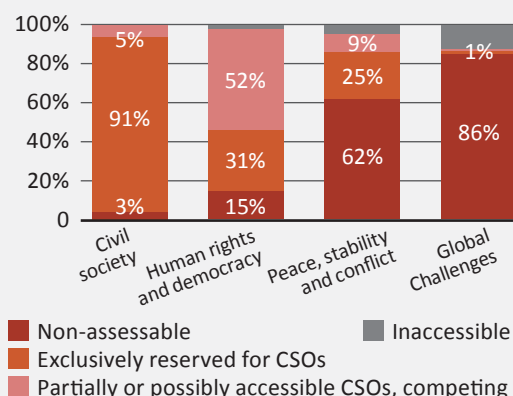
- Civil Society
- Human Rights and Democracy
- Peace, Stability and Conflict prevention
- Global Challenges (Partnerships, People, Planet, Prosperity)

Within our sample, thematic programmes represent a total of 25% (EUR 6.6 bn) of the analysed budget, of which approximately 49% is channelled through pillar-assessed entities. The analysis shows that funding explicitly earmarked for CSOs is concentrated in the Civil Society Organisations thematic programme (91% exclusively reserved for CSOs), the Human Rights and Democracy programme (31% exclusively reserved and 67% potentially accessible to CSOs) and, to a lesser extent, the Peace, Stability and Conflict Prevention programme (25% exclusively reserved and 9% potentially accessible). Conversely, CSOs are almost excluded from the implementation of the Global Challenges thematic programme (1%).

Overall, CSOs are primarily engaged in areas related to governance, human rights, and democracy promotion, while their potential role in the implementation of sector-specific public policies remains under-recognised.

If funding modalities were primarily shaped by contextual needs, one would expect these patterns to vary significantly across crisis and risk environments.

**Figure 9: Accessibility of funding for CSOs by thematic programme**



**Table 2: Country level budget distribution in EUR million by management modes and crisis risk levels**

Country-level budget distribution in EUR million by management modes and crisis risk levels						
EC-INFORM Risk level rounded figures	Indirect management	Direct management	Budget support	Contingency and evaluation budget	Total	
1-Very low	NA	NA	NA	NA		
2-Low	43%	28%	28%	1%	100%	
3-Medium	60%	18%	21%	1%	100%	
4-High	48%	24%	15%	14%	100%	
5-Very high	59%	34%	5%	2%	100%	

NOTE: The table focuses on the analysed budget at country-level (in total EUR 8.476 billion) and allows for comparison of the budget distribution across contexts of different risk levels, based on the EC-INFORM Risk Level index.

**Table 2 examines whether these funding patterns shift across different crisis and risk contexts, as classified by the EC-INFORM index.** As expected, the use of budget support decreases as risk levels increase. However, indirect management remains dominant across all contexts, including in high and very high-risk settings.

While direct management slightly increases in very high-risk contexts, this does not translate into clearer or more accessible funding arrangements for civil society. Overall, the data shows that heightened levels of crisis or fragility do not fundamentally alter how EU external action funding is channelled. The same structural features — reliance on indirect management, limited traceability and restricted entry points for CSOs — persist regardless of context.

### 3.3 Team Europe Initiatives reinforce indirect management

In an attempt to foster coordination across Member States and deliver the GG Strategy through a Team Europe approach – bringing together European Member States financial and development institutions while also mobilising the private sector<sup>7</sup> – the EU is promoting “Team Europe Initiatives” (TEI). European countries are encouraged to work together and sign Multi-Partner Contribution Agreements to better distribute labour and enhance their impact.

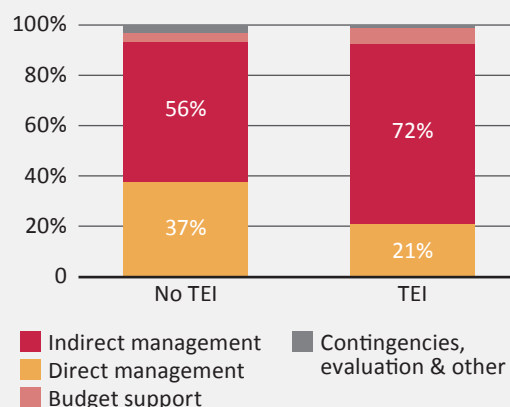
TEIs represent a substantial component of EU external action under NDICI–Global Europe. In the analysed sample, **36% of the reviewed action**

**documents** are labelled as TEIs. These actions are predominantly concentrated in geographic programming, particularly at country and regional levels, while thematic programmes remain the least likely to be implemented through TEIs.

TEIs are characterised by a strong reliance on **indirect management**, which accounts for **72% of TEI funding** in the dataset. This implementation pattern contrasts with thematic programmes, where direct management remains more prevalent, and has direct implications for traceability and access for CSOs.

In terms of identifiable access for CSOs, the data show a marked difference between TEI and non-TEI actions. Of the total TEI funding analysed, **only 4% (EUR 0.411bn) is explicitly reserved for CSOs**, compared with **13% (EUR 2.207bn)** in non-TEI actions. While CSOs may still be involved through indirect or downstream arrangements, the limited share of funding explicitly earmarked for them indicates that TEIs offer **few predictable and clearly identifiable funding opportunities** for civil society within the current framework.

**Figure 10: Distribution of the budget in % by management mode in Team Europe Initiatives**



<sup>7</sup> [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/stronger-europe-world/global-gateway\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/stronger-europe-world/global-gateway_en)

## 4. RECOMMENDATIONS

In recent years, the EU's external action architecture has undergone major changes, marked by an increased reliance on indirect management, expanded partnerships with pillar-assessed entities, and the introduction of new initiatives such as the Global Gateway and the Team Europe approach. While these shifts aim to increase scale, speed and geopolitical impact, CSOs have not been systematically integrated into this evolving cooperation model. Funding mechanisms have not adapted to the new context, and programmes such as DEAR (Development Education and Awareness Raising, one of the priorities of the current CSO programme), and funding modalities previously earmarked for CSO engagement are disappearing. This trend raises concerns about whether the current and future EU external action financial architecture continues to guarantee meaningful access, participation and leadership for civil society.

Civil society is not a homogeneous group. It encompasses a wide diversity of actors. Yet EU external action frameworks and funding modalities do not sufficiently recognise this diversity, nor the demonstrated ability of CSOs to design, manage and deliver large-scale programmes, technical assistance, and policy support as independent implementing partners.

As highlighted in the 2023 “Who holds the Lion’s Share” report, which provides concrete evidence on EU funding for CSOs, it is essential to assess whether EU external action continues to recognise civil society as equal and independent partners, with distinct expertise, operational capacity, reach and accountability to local communities.

The [Commission’s proposal for a Performance Regulation](#) to strengthen transparency and access to information for EU funding is a step in the right direction. However, to deliver meaningful change, initiatives such as the Single Gateway initiative must be accompanied by concrete implementation measures that ensure traceability of funding flows and predictable access to funding, and accountability across all implementation modalities, including indirect management. At the same time, the preparation of the next Global Europe Instrument for the 2028–2034 period offers a critical opportunity

to reassess and redesign funding modalities for civil society, ensuring that future frameworks systematically enable CSOs to act as independent and effective implementing partners within EU external action.

The recommendations below aim to ensure that the EU delivers on its commitments to Overseas Development Aid (ODA) principles, inclusive partnerships and local ownership. They seek to establish equitable and inclusive partnerships with CSOs by recognising CSO diversity, independent right of initiative, and technical and operational capacity to act as implementing partners in EU external action.

### 1. Make funding for civil society a rule, not an option.

**1.1. Establish a minimum share of EU external funding for implementation by CSOs**, ensuring predictable space and dedicated resources for civil society within EU external action. This minimum share should reflect CSO’s proven capacity to deliver impactful, inclusive, and sustainable results, and to drive locally led development across the programme cycle.

**1.2. Make CSO participation a binding requirement across all relevant funding modalities**, including indirect management, **and ensure that EU-funded actions implemented in the context of Team Europe Initiatives and Global Gateway systematically integrate civil society**. This should require structured and meaningful CSO involvement at all stages of programme design, implementation, and monitoring, supported by dedicated CSO components or clearly defined sub-granting mechanisms.

**1.3. Introduce a mandatory requirement for pillar-assessed entities to form equal partnerships with CSOs**. These partnerships should ensure clearly defined roles for CSOs in co-design and co-implementation, as well as transparent arrangements for channelling resources to CSOs, proportionate to the nature and objectives of the action.

## 2. Guarantee direct and equitable access to EU funding for diverse civil society organisations

### Adapt legal frameworks to CSO diversity

- 2.1. Adapt EU funding rules, procedures and grant volume to reflect the diversity of civil society in terms of size, capacity, and operating context, ensuring proportionate and equitable access for CSOs so that local and community-based organisations can participate effectively.
- 2.2. Expand the use of **multi-annual partnership agreements and operating grants** that support CSOs as independent development actors, recognising their long-term operational capacity, institutional knowledge, and accountability to local communities beyond project cycles.

### Ensure proportionality in financial and administrative requirements

- 2.3. Adjust financial and administrative requirements and simplify contracting and verification rules in Financial Support to Third Parties (FSTP) based on the grant size and purpose, and on the final recipient's capacity.
- 2.4. Remove co-funding requirements for FSTP.
- 2.5. Allow full pre-financing and maintain reduced or waived co-financing obligations for **small or local CSOs**, especially in fragile or shrinking civic space contexts.
- 2.6. Allow reliance on CSOs' accounting and reporting systems set by national authorities to reduce transaction costs and avoid duplicative formats.

### Simplify access and strengthen participation in programming

- 2.7. Simplify application processes by continuing to prioritise restricted calls (concept note followed by full proposal only for pre-selected applicants).
- 2.8. Allow applicants to submit proposals in **multiple languages** for global calls (at least the four languages of the PRAG<sup>8</sup>).

- 2.9. Make programming consultations regular, inclusive and responsive, including by assigning sufficient financial and human resources to EU Delegations to ensure meaningful interaction and engagement with local civil society.

## 3. Ensure transparency, accountability and traceability across the EU external action funding architecture.

- 3.1. Publish complete, timely and disaggregated data on all EU external funding, including second-level recipients under indirect management, and include dedicated filters to identify funding allocated to CSOs.
- 3.2. Disclose a comprehensive and regularly updated list of pillar-assessed entities, disaggregated by assessment pillar, and clearly specify which entities are authorised to provide financing to third parties.
- 3.3. Introduce CSO-related performance indicators in the Performance Regulation to track the share of EU funds directly reaching CSOs and the share of funding sub-granted to CSOs by other implementing actors.
- 3.4. Require pillar-assessed entities to submit machine-readable reports on sub-granting to CSOs, aligned with European Commission data formats, to ensure traceability of funding flows under indirect management.
- 3.5. Reinstate the systematic publication of award notices for call for proposals to strengthen transparency and accountability under direct management.

8 <https://wikis.ec.europa.eu/spaces/ExactExternalWiki/pages/152798604/ePRAG>

# 5. ANNEXES

## 5.1 Methodology

### 5.1.1 Quantitative Analysis

#### 5.1.1.1 Scope and data sources for the quantitative analysis

The analysis relies exclusively on publicly available official action documents, specifically contained in the Multi-Annual and Annual Action Plans and measures, which offer the most detailed programmatic information on management modes and funding modalities. The initial 2023 data collection (2023 study) focused on a sample of geographic action plans and measures. This initial phase provided crucial insights into country and regional-level programming, covering 162 country-level and 116 regional action documents published in English and/or French between November 2021 and April 2023. This approach reflects the level of transparency available to external stakeholders **through EU programming documents** and defines the boundaries within which CSO access to EU funding can be assessed<sup>9</sup>.

The 2025 data collection (updated study) significantly expanded this scope by incorporating newer publications as well as thematic action documents published between November 2021 and May 2025. The data was collected through an extensive computer-assisted review and automatically fed into a new database. Data cleaning and coherence checks were necessary before proceeding to the integration in one joint database and starting the data analysis phase. In total, 787 documents were reviewed across both phases (excluding the Rapid Response pillar), covering a cumulative budget of approximately EUR 26.42 billion.

During the data exploration phase, the Rapid Response pillar was excluded due to its small sample (8 action documents, EUR 149 million). Furthermore, it was observed that the budget

support share had significantly increased compared to 2023, due to an exceptionally high budget support attributed to Ukraine in 2024 (Work programme of the Ukraine Facility pillar I for 2024-2027, EUR 5.3 billion). Identified as a statistical outlier, falling well beyond the expected range of the dataset, it was decided to exclude this action from the analysis. Its inclusion would have disproportionately influenced the results without reflecting the underlying patterns of management modes and modalities which this research focuses on. Previous action documents for Ukraine, including one allocating EUR 250 million of budget support to Ukraine in 2023, were maintained.

The 2025 study differentiates between two pillars / three scopes: (i) Geographic pillar: Country-level and regional actions and the (ii) Thematic pillar-related actions. The study looks at two major management modes (i) Indirect management and (ii) Direct management, as well as two additional budget implementation instruments, (iii) Budget support and (iv) Contingency, evaluation and other budgets.

The breakdown of documents and budget reviewed in 2023 and 2025 respectively and in total is as follows:

**Table 1: Number of documents reviewed, and corresponding amount in billion**

Number of documents	2023	2025	Total
Country	162	183	<b>345</b>
Regional	116	150	<b>266</b>
Thematic	0	176	<b>176</b>
Total	278	509	<b>787</b>

Budget in EUR billion	2023	2025	Total
Country	3.86	4.61	<b>8.48</b>
Regional	3.65	7.62	<b>11.26</b>
Thematic	0.00	6.68	<b>6.68<sup>10</sup></b>
Total	7.51	18.91	<b>26.42</b>

<sup>9</sup> <https://concordeurope.org/resource/who-holds-the-lions-share-a-closer-look-at-global-europe-funds-for-csos/>

<sup>10</sup> During budget negotiations for the current MFF, CSOs and Members of the European Parliament were able to achieve a top-up of thematic programmes due to the latter's underfunded budget, which explains why this amount is higher than the roughly EUR 6.4bn initially budgeted.

### 5.1.1.2 Quantitative data collection and processing

The data collection process involved systematic review and coding of each action document against a detailed indicator list. To enhance the participatory nature and robustness of the research, the 2025 data collection was conducted throughout the month of June 2025 with the active involvement of three experienced data collectors from the CONCORD community. Their direct engagement ensured a broader perspective and deeper contextual understanding during the coding process. It was necessary to ensure a seamless and coherent methodological integration of both the 2023 and 2025 databases. An iterative process of cross-referencing and harmonisation aimed to reconcile any discrepancies and ensure that data points collected in both phases contribute to a consistent and comparable overall analysis. It was decided to treat ‘pillar-assessed’ and ‘entrusted’ entities as interchangeable terms. Both terms refer to organisations (such as UN agencies or Member State agencies) to which the EU delegates the implementation of funds, having certified their management capacities. To maintain data integrity and consistency and to avoid double-counting, the study focuses exclusively on the original and initial programming documents for quantitative analysis. Addenda or amendments to original programming documents were considered but finally excluded, as they often do not contain consistent and sufficiently detailed information justifying a systematic replacement and update of the initial programming documents.

### 5.1.1.3 Limitations of quantitative analysis

**Despite the rigorous methodological approach, this study is subject to several inherent limitations.** In line with the approach adopted in the first edition of *The Lion’s Share*, situations where funding flows cannot be traced through publicly available documentation are treated as an analytical finding rather than a data gap. The category “non-assessable” therefore reflects limitations in transparency and traceability of EU programming, not an assumption about the absence of civil society involvement.

The primary reliance on publicly available action documents means the analysis is confined to data as it is programmed and published. These documents often lack the granular detail required for a complete understanding of all funding flows, particularly regarding the breakdown of funds under indirect management beyond the initial recipient. This limitation makes it challenging to precisely quantify the exact amount of funding that ultimately reaches CSOs through multi-layered sub-granting mechanisms. The presence of “non-assessable” budget lines, especially prevalent in regional action plans, further restricts a fully comprehensive and representative analysis of all EU funding.

While the study provides insights based on documents available up to May 2025, one must note that EU international cooperation and its funding mechanisms are dynamic, with ongoing adjustments and reallocations that may not be fully captured by static programming documents. Furthermore, the analysis highlights how certain drafting practices within action documents can impact the readability and detail of the available data. Specifically, we observe that authors maintain flexibility by mentioning broad categories like “pillar-assessed” or “entrusted” entities rather than pre-identifying specific implementing organisations under indirect management. Similarly, in direct management, phrases such as “may be given to” and the indication of alternative modalities (if changes are required) introduce a degree of ambiguity in programming. While this practice is understood not as an act of withholding information, but rather as a necessary anticipation of potential changes in dynamic operational contexts, it nonetheless poses a limitation to the granularity and definitive commitment explicit in these programming documents. As a reminder, these are planning documents, not contractual agreements.

## 5.1.2 Qualitative Analysis

### 5.1.2.1 Scope and data sources for the qualitative analysis

To further explore the quantitative data analysis and better appraise the “whys” and the “hows”, the study included 19 semi-structured, key informant interviews. Sampling was done to

ensure a balanced representation of stakeholders to address research questions. The 2023 study drew on a sample of over 40 countries; it was decided to maintain that sample, divide it into strata based on characteristics that mattered for the study. These characteristics include:

- Global Gateway ranking: to appraise how Global Gateway was impacting funding, we selected both countries that had a high number of GG flagship projects<sup>11</sup>, and those where few to no projects were registered.
- Fragility: given that implementation modalities significantly differ based on the fragility status, we made sure that our sample comprised both fragile and non-fragile states, using the OECD fragility index<sup>12</sup>.
- Geography: the bulk of EU funding targets

Africa; yet the study sought to gather views from countries in other parts of the world.

Six combinations were identified that ensured a diverse and representative sample:

- #1: non-fragile, high GG ranking, African
- #2: fragile, high GG ranking, African
- #3: non-fragile, high GG score, Latin America/ Caribbean
- #4: fragile, low GG score, non-African
- #5: non-fragile, low GG score country<sup>13</sup>
- #6: fragile, low to medium GG score

We established a replacement mechanism to be used if targeted interviewees were unable or unwilling to participate. Each combination consequently led to the identification of two countries, as featured in the table below.

Concretely, targeted interviewees based in

**Table 2: Sampled countries and criteria**

Country	Fragile	GG score	Continent	Combination ID
Senegal	No	Very high	Sub-Saharan Africa	1.0
Ghana	No	High	Sub-Saharan Africa	1.1
Nigeria	Yes	Very high	Sub-Saharan Africa	2.1
DRC	Yes	Very high	Sub-Saharan Africa	2.0
Peru	No	High	Latin America and the Caribbean	3.0
Colombia	No	High	Latin America and the Caribbean	3.1
Nicaragua	Yes	None	Latin America and the Caribbean	4.0
Myanmar	Yes	None	Asia and the Pacific	4.1
Comoros	No	None	Sub-Saharan Africa	5.0
Libya	No	None	Neighbourhood	5.1
Burundi	Yes	Medium	Sub-Saharan Africa	6.0
Pakistan	Yes	Low	Asia and the Pacific	6.1

11 [https://international-partnerships.ec.europa.eu/policies/global-gateway/global-gateway-projects\\_en](https://international-partnerships.ec.europa.eu/policies/global-gateway/global-gateway-projects_en)

12 [https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/02/states-of-fragility-2025\\_c9080496/81982370-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/02/states-of-fragility-2025_c9080496/81982370-en.pdf)

13 Those two countries (Comoros and Libya) are actually considered fragile based on the OECD fragility index; but the EC INFORM matrix rank them as “medium”. Exceptionally, and for the sake of this research, they are considered not fragile.

countries coded “x.01” were solicited in priority; when a majority of them failed to respond, requests were sent to countries “x.1”. Under some combinations, representatives from both countries were interviewed. Sudan, which initially did not fall in the sample, was eventually selected as a particularly interesting conflict-affected country.

Beyond these countries, the study sought to collect the views of cooperation agencies from one Member State.

### 5.1.2.2 Qualitative data collection and processing

CONCORD members were invited to identify focal points in both EU delegations and civil society organisations within those twelve countries. An official letter was sent to the first batch of countries under each of the six combinations to introduce the study and request interviews. Interviews were held throughout June to September 2025. Interview guidelines were structured to explore the following dimensions:

- Introduction: presenting the study and offering the interviewee to introduce their overall portfolio and mandate.
- Exploring the relationship between the EUs and CSOs: legal grounds for cooperation, nature and frequency of the consultations between both parties, recent trends and dynamics, access to funding, perception of the challenges when working with each other.
- Exploring the overall cooperation ecosystem: open discussion on the role of CSOs as development partners, added value and challenges when working with CSOs, other donors’ CSO strategies.
- Outlook and recommendations: how to bridge the gap, suggestions and recommendations for both parties.

### 5.1.2.3 Limitations of qualitative analysis

The qualitative component is used exclusively to contextualise and complement, where relevant, patterns identified in the quantitative document review; it does not generate standalone findings nor inform quantitative assessments of CSO access to funding. Although that sampling strategy led to the collection of representatives, quality insights, three key limitations are worth mentioning. First, despite repeated invitations, the research team managed to interview only one Member State cooperation agency. The study would have benefitted from further insights. Second, out of the 19 interviews, only three of them were conducted with local CSOs. Given their role in local development dynamics and the many challenges they face in accessing EU funding, more insights would help understand how to bridge the gap with the EU. Finally, interviewed EU representatives are, in many cases, in charge of cooperation or CSO-related portfolios. While their knowledge of cooperation matters is precious, the study recognises that their views might not entirely reflect the diversity of opinion across EU delegations.

## 5.2 Country list for the document review

Country	ISO-3 code	Region (EU)	Sub-region
Benin	BEN	Sub-Saharan Africa	West & Central Africa
Bolivia	BOL	Latin America and the Caribbean	Latin America
Burkina Faso	BFA	Sub-Saharan Africa	West & Central Africa
Burundi	BDI	Sub-Saharan Africa	East Africa
Cabo Verde	CPV	Sub-Saharan Africa	West & Central Africa
Cambodia	KHM	Asia and the Pacific	Southeast and East Asia
Colombia	COL	Latin America and the Caribbean	Latin America
Comoros	COM	Sub-Saharan Africa	West & Central Africa
Democratic Republic of the Congo	COD	Sub-Saharan Africa	West & Central Africa
Dominican Republic	DOM	Latin America and the Caribbean	Caribbean
Gabon	GAB	Sub-Saharan Africa	West & Central Africa
Georgia	GEO	Neighbourhood	Eastern Neighbourhood
Ghana	GHA	Sub-Saharan Africa	West & Central Africa
Honduras	HND	Latin America and the Caribbean	Caribbean
Iraq	IRQ	Asia and the Pacific	Middle East/Gulf
Jordan	JOR	Neighbourhood	Southern Neighbourhood
Kazakhstan	KAZ	Asia and the Pacific	Central Asia
Kenya	KEN	Sub-Saharan Africa	East Africa
Kyrgyzstan	KGZ	Asia and the Pacific	South Central Asia
Lao People's Democratic Republic	LAO	Asia and the Pacific	Southeast and East Asia
Lebanon	LBN	Neighbourhood	Southern Neighbourhood
Libya	LBY	Neighbourhood	Southern Neighbourhood
Mozambique	MOZ	Sub-Saharan Africa	Southern Africa
Myanmar	MMR	Asia and the Pacific	Southeast and East Asia
Namibia	NAM	Sub-Saharan Africa	Southern Africa
Nepal	NPL	Asia and the Pacific	South Central Asia
Nicaragua	NIC	Latin America and the Caribbean	Latin America
Nigeria	NGA	Sub-Saharan Africa	West & Central Africa
Pakistan	PAK	Asia and the Pacific	South Central Asia
Peru	PER	Latin America and the Caribbean	Latin America
Senegal	SEN	Sub-Saharan Africa	West & Central Africa
South Sudan	SSD	Sub-Saharan Africa	East Africa
Sri Lanka	LKA	Asia and the Pacific	South Central Asia
Syria	SYR	Neighbourhood	Southern Neighbourhood
Tanzania	TZA	Sub-Saharan Africa	East Africa
Togo	TGO	Sub-Saharan Africa	West & Central Africa
Ukraine	UKR	Neighbourhood	Eastern Neighbourhood
Vietnam	VNM	Asia and the Pacific	Southeast and East Asia
Zambia	ZMB	Sub-Saharan Africa	Southern Africa
Zimbabwe	ZWE	Sub-Saharan Africa	Southern Africa

### 5.3 Management modes

According to Article 26 of the NDICI-Global Europe Regulation, there are two major “methods of cooperation” or management modes. Financing under the instrument shall be implemented “either directly by the Commission, by EUDs or by executive agencies, or indirectly through any of the entities listed in the Financial Regulation.” According to points (a) and (c) of Article 62(1) of the Financial Regulation, budgets may be implemented: (a) directly (‘direct management’) [by the EU], its departments, including its staff in the EUD under the authority of their respective Head of Delegation. (c) indirectly (‘indirect management’) [...] by entrusting budget implementation tasks to: (i) third countries or the bodies they have designated; (ii) international organisations or their agencies, within the meaning of Article 156; (iii) the European Investment Bank (‘the EIB’) or the European Investment Fund (‘the EIF’) or both of them acting as a group (‘the EIB group’); (iv) Union bodies referred to in Articles 70 and 71; (v) public law bodies, including Member State organisations; (vi) bodies governed by private law with a

public service mission, including Member State organisations, to the extent that they are provided with adequate financial guarantees; (vii) bodies governed by the private law of a Member State that are entrusted with the implementation of a public-private partnership and that are provided with adequate financial guarantees; (viii) bodies or persons entrusted with the implementation of specific actions linked to the Common Foreign and Security Policy (CFSP) [...]. While the budget may also be managed in a shared manner (see Article 62(1)(b)) of the Regulation, the present study focuses on direct and indirect management which are most relevant to the analysis of geographic action plans and measures.

### 5.4 Grant aid modalities most likely to be used by CSOs

The grant aid modalities most likely to be considered by CSOs are grants, awarded through calls for proposals, direct awards (cf. Articles 189, 194 and 195 of the Financial Regulation), Financial Framework Partnership Agreements

Calls for proposals	Usually includes civil society as an actor. Award based on quality of application, fulfilment of call criteria contained in the Call for Proposals guidelines and internal decision-making process. Calls for Proposals are published on the EU Funding and Tender Opportunities portal. Programme design, award and contracting is mainly managed by EU Delegations for single country programmes or by DG INTPA or DG NEAR for regional or global calls.
Direct awards	The actor is approached to submit an application without going through a call for proposal. May also be awarded in exceptional situations, in case of monopoly situations, in fragile countries operating under flexible procedures or to ensure a rapid response to provide strategic support when there is no time to go through a call for proposals. Can also include low-value grants to human rights defenders to finance urgent protection actions and needs and low value grants to civil society organisations.
Financial Support to Third Parties (sub-granting)	A financing mechanism that can support CSOs, whereby the donor provides funding to a generally well-established or umbrella organisation, which in turn facilitates funding (in the form of subgrants) for a number of smaller or grassroots organisations.
Framework Partnership Agreements (FPAs)	Framework Partnerships can be entered into by civil society networks, normally following a call for proposals. Once accepted as an FPA-holder, dedicated funding streams may be available. The eligibility criteria determining support for national or regional networks include: strategic plan with long-term vision, specific objectives, proven organisational and management strengths, democratic internal governance etc.

Source: CONCORD (2022), Guide to Global Europe Funding 2021-2027: For civil society organisations, <https://concordeurope.org/resource/guide-to-global-europe-funding-2021-2027-for-civil-society-organisations/>

(FFPAs) and Financial Support to Third Parties (sub-granting). While Article 189 reflects the commitment to transparency and specifies that “Grants shall be awarded following a publication of calls for proposals”, Article 195 defines the exceptional circumstances under which “Grants may be awarded without a call for proposals”. Such exceptional circumstances include inter alia grants for humanitarian purposes and emergency situations as well as grants for entities “with a de jure or de facto monopoly”. Article 27 of the NDICI-Global Europe Regulation specifies other situations the direct award procedure may be used for: low-value grants to human rights defenders, to finance actions where the publication of a call for proposals would be inappropriate (e.g. where there is a threat to democratic institutions, escalation of crisis or armed conflict or human security is most at risk) and low-value grants to CSOs including simplified forms of financing (cf. Article 125 of the Financial Regulation).

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