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Fostering inclusiveness in a Team Europe approach

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In recent months, the 'Team Europe' approach has contributed to renewed political momentum for the EU and member states to work better together within and beyond the response to the COVID-19 pandemic. But when it comes to EU development cooperation, there are big differences between member states in terms of their experience and expertise, their resources and their capacity to engage. The lion's share of EU-funded contracts are awarded to only a handful of prominent European national development agencies that have a strong 'footprint' in partner countries or in a given sector.

This paper analyses the concept of inclusiveness and its importance for EU development policy – both politically and operationally. Inclusiveness seeks to ensure that all interested member states – including their implementing agencies and development finance institutions – are involved in the planning and implementation of EU development cooperation activities. The concept of inclusiveness is increasingly acknowledged in EU policy and legal texts. Yet, it still faces a number of institutional and operational challenges and needs to be facilitated in practice to create a level playing field between member states. In doing so, inclusiveness should not be seen as an end in itself but primarily seek to improve the effectiveness and impact of EU development cooperation.

Our analysis suggests that there is a broad agreement between the EU and member states on the need for more inclusiveness. However, it also identifies a number of key bottlenecks and disincentives at institutional and field level which are holding down progress. There are good practices for enhanced and more inclusive collaboration between the EU and member states, as well as opportunities to do so in the context of the new programming cycle of the Neighbourhood, Development and International Cooperation Instrument (NDICI) - Global Europe, and the Team Europe Initiatives.

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Acronyms

AFD	Agence française de développement
BCEE	Baltic, Central and Eastern European countries
CPMA	Central Project Management Agency
CzechAid	Czech Development Agency
DFI	Development finance institution
EBRD	European Bank for Reconstruction and Development
ECDPM	European Centre for Development Policy Management
EDF	European Development Fund
EEAS	European External Action Service
EFAD	European financial architecture for development
EIB	European Investment Bank
EU	European Union
EUD	European Union Delegation
EUR	Euro
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit (German Corporation for International Cooperation)
HQ	Headquarters
INGO	International non-governmental organisation
KfW	Kreditanstalt Für Wiederaufbau (German Development Finance Institution)
MFF	Multiannual Financial Framework
MS	Member states
MSO	Member state organisations
NDICI	Neighbourhood, Development and International Cooperation Instrument
NGO	Non-Governmental Organisation
ODA	Official development assistance
OPSYS	Operational System
PN	Practitioners' Network
PSE	Public sector expertise
RoAID	Romania's International Development Cooperation Agency
SlovakAid	Slovak Agency for International Development Cooperation
TAIEX	Technical Assistance and Information Exchange
TEI	Team Europe Initiative

1. Introduction

In recent years, there has been a growing recognition of the importance of promoting inclusiveness in the policy design and implementation of European Union (EU) development cooperation. The COVID-19 crisis has acted as an accelerator and created a strong momentum and geopolitical imperative for European collective action (Jones and Teevan 2021). The 'Team Europe' approach that emerged as part of the EU collective response to the pandemic illustrates perfectly this renewed impetus for collective action, and the programming process of the Neighbourhood, Development and International Cooperation Instrument (NDICI) - Global Europe brings a new framework and opportunities to do so, also beyond the pandemic.

Significant efforts were made in the last decade to promote the so-called 'working better together' agenda, including through enhanced coordination and joint activities between the EU institutions and the member states. Inclusiveness is a central aspect of this agenda, as it seeks to ensure that all interested member states can effectively participate in EU development policy-making and implementation. However, EU development cooperation remains an area where big differences exist between member states in terms of their experience and expertise, resources and capacity to engage. While progress was made in recent years to raise awareness on the importance of bolstering inclusiveness, there is still scope to further improve the institutional and operational processes aimed at creating a level playing field between member states. In order to facilitate inclusiveness in practice, particular attention should be paid to those that are not currently participating widely in European development cooperation, notably smaller member states and/or member states with less development cooperation resources and/or experience.

The policy and legal framework as well as the institutional processes are increasingly enabling for joint work between the EU and the member states. Yet, one of the main challenges remains the follow through and operationalisation, and how to close the policy-to-practice gap so as to ensure that the EU and member states - including their implementing agencies and development finance institutions - can effectively work better together in an inclusive manner, both at HQ and at field level.

Inclusiveness doesn't mean that every actor should participate and have a say in everything. Ultimately, it should also bring strong benefits and positive impact for partner countries. While a particular focus should be placed on creating a level playing field between member states and their cooperation agencies, the primary purpose should be to improve the effectiveness and impact of EU development cooperation. Hence, a careful balance must be ensured between inclusiveness and effectiveness.

This paper seeks to unpack the concept of inclusiveness in EU development policy and present the main justifications from various perspectives and interests at stake. While there seems to be a broad agreement on the importance of inclusiveness for EU development cooperation, our analysis identifies key bottlenecks and incentive structures that are still holding down progress, both on policy and implementation and at HQ and field levels. The paper then makes a number of recommendations on how the EU institutions and the member states can overcome some of the challenges and obstacles, notably in the context of the NDICI programming and the Team Europe Initiatives.

2. Unpacking the concept of inclusiveness

The concept of inclusiveness emerged in recent years and features increasingly in EU development policy discourse. It has gained more political importance especially in light of the Multiannual Financial Framework (MFF) negotiations and the broadening of priorities for EU external action, including a more policy-driven and interest-driven cooperation.

2.1. The emergence and rationale for inclusiveness

In recent years, there has been growing demand and pressure, notably from small and medium size MS, to be more involved in the policy design and implementation of EU financial assistance programmes through diverse modalities and instruments. A consensus on the importance of promoting inclusiveness in EU development policy now seems to have been reached across the EU institutions and member states. This is notably due to the efforts made by the EU institutions as well as successive EU Presidencies since 2017 - notably Portugal most recently, as well as EU13[1] countries before it - to raise awareness on inclusiveness in EU development cooperation. The principle of inclusiveness has progressively been enshrined in recent EU policy and legal documents (see Box 1), such as in the New European Consensus, the discussion on the European financial architecture for development (EFAD), Team Europe or the NDICI - Global Europe regulation.

While there is no clear definition or common understanding of the concept, inclusiveness typically stresses the importance of ensuring that more member states - including small and medium sized member states – are involved in the planning and implementation of EU development cooperation activities. It implies bringing all interested member states on board - both on policy design and implementation, and at HQ and field levels - with a view to creating a level playing field between member states in the area of development cooperation.

In order to facilitate inclusiveness and create this level-playing field, recent discussions (e.g. in the context of the EFAD) have also stressed the need to create incentives for enhanced cooperation, notably among European development finance institutions and implementing actors, and to develop tools and instruments to support inclusive partnerships with smaller development institutions (EC 2020).

Inclusiveness also refers to the growing recognition that a wider variety of implementing partners from the member states should be involved, including development cooperation agencies, development finance institutions, but also European non-governmental organisations (NGOs) and private sector entities.

The concept of inclusiveness further stresses the need to build on the wealth and diversity of member states' assets and share their experience in terms of expertise, comparative advantages, and political leverage in certain regions or sectors.

Box 1: Key references to the concept of inclusiveness in recent EU development policy and regulation

In **2016, the Global Strategy** called for the EU and member states to collectively invest in a credible, responsive and joined-up Union, including by *"mobilising our unparalleled networks, economic weight and all the tools at our disposal in a coherent way"* (EEAS 2016: 10).

The **2017 European Consensus on Development** stated that *"the EU and its member states will further improve the way they deliver their cooperation, including by working together better, taking account of their respective comparative advantages''* (para 73). The Consensus recalled that *"Joint programming should be promoted and strengthened, while being kept voluntary, flexible, inclusive, and tailored to the country context"* (para 75). It further pointed that *"Joint implementation will be inclusive and open to all EU partners who agree and can contribute to a common vision, including member states' agencies and their development financial institutions, the private sector, civil society and academia"*, and that *"[it] should build on different actors' comparative advantages and sharing of best practices. In this context, the EU and member states will continue to draw on and share the experiences of all member states, including transition experience"* (Council of the EU 2017: 36: para. 78).

[1] Under EU13 we mean the following countries: Bulgaria, Croatia, Cyprus, Czech Republic, Estonia, Hungary, Latvia, Lithuania, Malta, Poland, Romania, Slovakia and Slovenia.

The **2019 Council Conclusions on the European Financial Architecture for Development** stressed the need to *"create incentives to strengthen cooperation among development finance and implementing actors of different sizes, profiles, and strengths to maximise development impact, in particular supporting inclusive partnerships with smaller development institutions, and making best use of instruments such as cooperation arrangements, co-financing, and mutual reliance procedures"* (Council of the EU 2019a: 6, para. 23).

The **2020 Council Conclusions on Team Europe global response to COVID-19** called on the EU Delegations to *"ensure inclusive participation of all member states' diplomatic networks, including European development agencies, the European Investment Bank (EIB) and other European financial institutions, as well as other relevant actors at country level, in line with the Working Better Together approach"* (Council of the EU 2020: 3, para. 12).

The **2021 Council Conclusions on Team Europe** recall that *"All members of Team Europe work together in an inclusive and coordinated manner to support partners. Team Europe is more than the sum of its parts."* (Council of the EU 2021: 2, para. 2). They further call upon *"Team Europe members to closely coordinate and jointly design, implement and monitor Team Europe Initiatives in an inclusive manner"* (Council of the EU 2021: 5, para. 12).

The **NDICI - Global Europe** regulation legally enshrines the concept of inclusiveness. The preamble recalls that *"the Union's and member states' development cooperation policies should complement and reinforce each other. The Union and its member states should be united in diversity and working better together, using a variety of experiences and approaches, bearing in mind their comparative advantages. Therefore, the Union should foster inclusiveness and collaboration with member states seeking to maximise added value and taking into account experience and capacities, thus reinforcing shared interests, values and common goals. In this regard, the Union and its member states should also seek to promote the exchange of best practices, knowledge sharing and capacity-building amongst them. In cases of forms of Union funding in which public administrations of member states are involved, such as twinning, simplified implementing and contractual provisions should be discussed with member states"* (European Parliament 2021: 13, para. 36). Among the general principles, the NDICI regulation reiterates that *"The Union shall foster inclusiveness in the implementation of this Regulation and collaboration with member states, seeking to maximise added value and taking into account experience and capacities, thus reinforcing shared interests, values and common goals. The Union shall encourage the exchange of best practices and knowledge sharing among member states' bodies and experts"* (European Parliament 2021: 39, para. 7).

While everyone agrees on the importance of inclusiveness, the concept and rationale of inclusiveness can be understood and interpreted in different ways. There are indeed various aspects attached to it and different arguments put forward, and these can differ slightly depending on the perspectives of EU institutions, member states and development cooperation agencies or development finance institutions.

Understanding these different perspectives and narratives, including on the final objective of inclusiveness, as well on incentives and disincentives for inclusiveness, is a first step towards operationalising the concept.

2.2. The political and operational dimensions of inclusiveness

Overall, our analysis suggests that there are both political and operational dimensions to inclusiveness.

A **political dimension**, which puts forward the value of inclusiveness for enhancing European collective leverage and visibility, for ensuring a sense of ownership and buy-in of all member states, as well as for putting forward the wealth and diversity of the European approach to development cooperation, including new ways of working and cooperating in and with partner countries. It is also a way for all member states and their agencies to raise the profile of their work with the EU, internally and externally.

Inclusiveness also has a very practical and **operational dimension**, generally linked to the extent to which all member states (and their agencies, development finance institutions (DFIs), non-governmental organisations (INGOs) or private sector operators) can effectively and actively engage in the implementation of EU development cooperation activities, including accessing EU funds and contracts; tapping in the wealth and diversity of all member states and their respective areas of expertise; ensuring complementarity and added value for enhanced effectiveness and impact.

Table 1: Political and operational dimensions of inclusiveness

Political dimension of inclusiveness	***Operational dimension of inclusiveness***
Inclusiveness is a condition for true ownership of EU development policy and a way to ensure the buy-in and participation of all member states. The main political argument for inclusiveness revolves around the need to shape EU policies together in order to reflect the interests and priorities of all member states. Building EU development policy and architecture together is part of the European construction project, and inclusiveness should allow all member states to have the ability to exert influence on EU policy-making and adhere to their commitments. As enshrined in article 210 of the Treaty on the Functioning of the EU (Official Journal of the European Union 2016), EU development policy is an area of shared and parallel competence and implies that the EU institutions and the member states contribute equally to its design and implementation, and coordinate their activities. EU development policy is thus essentially built through consensus-building. The sense of ownership is also particularly important to fund bilateral priorities of member states and ensure stronger political support from domestic constituencies in all member states.	**Inclusiveness is central to the working better together agenda.** It is a way to increase development effectiveness by building on EU institutions and member states' comparative advantages in certain regions or sectors. Operationally, joint implementation has become a central way to enhance inclusiveness, notably by bringing together the various financial and non-financial means/modalities of EU member states and their agencies and promoting coordination, complementarity and division of labour where possible. Joint implementation can also enhance inclusiveness by encouraging the sharing of best practices and experiences. While respecting development effectiveness principles and ownership, inclusiveness also implies that European funds should go in priority to European actors (European preference).
Inclusiveness strengthens European identity and visibility. Inclusiveness allows the fostering of a sense of Europeanness and the projection of a united Europe on the global scene to which all member states should be associated. The EU's visibility and projection in the world - including the promotion of European values, solutions and interests - is stronger if it is collective and inclusive.	**Inclusiveness brings more diversity and healthy competition** among and between European and international partners. It is a way to ensure fair and equitable access to European funds and create opportunities for interested member states to take an active role in implementing EU funded initiatives and projects. For member states (especially smaller ones) it is important to show that they are getting something back from their contribution to the EU budget, notably by allowing them to 'get a fair share of the cake' when it comes to managing EU-delegated funds.
Inclusiveness enhances EU collective leverage. Inclusiveness is a way to build on the complementarities and wealth of resources of all EU member states, in terms of expertise, approaches, historical ties, political leverage, etc. Strengthening collective political engagement and leverage in international and development cooperation is also one of the main mottos behind the Team Europe approach and the promotion of the 'strategic autonomy of the EU'.	**Inclusiveness increases the European offer and can promote new ways of working and cooperating in and with partner countries.** In some countries, this diversity of approaches and political ties can also be a way to promote new cooperation modalities such as peer-to-peer exchanges and the provision of public sector expertise that can foster inclusiveness and promote more equal partnerships.

Inclusiveness is also a way to capitalise and use the transition experience of Baltic, Central and Eastern European countries (BCEE). The EU has taken and reiterated commitments to draw on and share the experiences of member states and lessons learnt[2] in its support to transition and reform in partner countries. Yet, research shows that BCEE countries have not really been able to incorporate their transition experience into the EU development policy, mainly due to their inability to build alliances and their low capacities as well as the limited interest in development policy in the BCEE countries (Balazs and Lightfoot 2015). The EU itself could do better to draw lessons from this and capitalise on the transition and reform experience, notably in terms of institutional capacity-building (Cibian 2020). Actors from all member states are now encouraged to share their respective expertise and associate themselves as Team Europe, including with their transition experience.

Inclusiveness allows the mutual learning and exchange between member states, and this will in turn help them and their agencies to explore opportunities to work better together. There is a strong interest (demand and offer) from member states and agencies of all sizes in learning from each other. Inclusiveness may facilitate the sharing of experience, knowledge and expertise on issues and topics of common interest, such as sectoral and geographical approaches, as well as national development cooperation systems and structures of member states. Learning from each other can help member states set up or adjust their respective national, institutional and operational structures and systems.

Politically, inclusiveness is meant to create a sense of Europeanness and ownership of EU development cooperation. Yet, the diversity of histories and geographical situations often makes it difficult to build consensus in a context in which consensus and unanimity of the 27 member states is required to agree on EU foreign and development policy. This situation creates vicious circles as policy framing around EU development cooperation comes predominantly from larger more experienced member states with higher official development assistance (ODA) budgets and longer history of engagement, resulting in more EU resources attributed to them. In turn, the less participation there is from smaller and inexperienced member states, the less political interest and support there is from their own constituency and leadership. As power dynamics within the EU change in the wake of Brexit, smaller member states are becoming more assertive and influential in development policy discussions. While this is to be welcomed, it is becoming increasingly problematic if and when consensus is not possible on some nationally sensitive issues.

Operationally, inclusiveness is often mainly perceived through the angle of ensuring that all interested member states can effectively take an active role in implementing EU funded initiatives and projects. The latter are still being awarded to only a handful of European national development agencies (see box 2).

Box 2: Attribution of EU-funded contracts to member states organisations

Each year as part of the budgetary and European Development Fund (EDF) discharge procedure conducted by the European Parliament, the Commission is asked to provide information and data on contracts awarded to EU member states' national public development and cooperation agencies for the management of EU programmes and projects. In recent years, some concerns have been expressed regarding the limited number of national development agencies that are awarded such contracts under the indirect management mode.

In December 2020, in a response to written questions by the European Parliament (European Parliament 2020), the Commission provided data on contracts under indirect management awarded to member states' agencies and development finance institutions between 2010 and 2019. Data accessed and analysed by DEVEX (Alcega 2021) show that the French and German bilateral aid agencies (i.e. Agence Française de Développement (AFD) and Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ)) and the German development finance institution (KfW) together received nearly 80% of the total funding awarded by the Commission during this period, amounting to almost EUR 6 billion.

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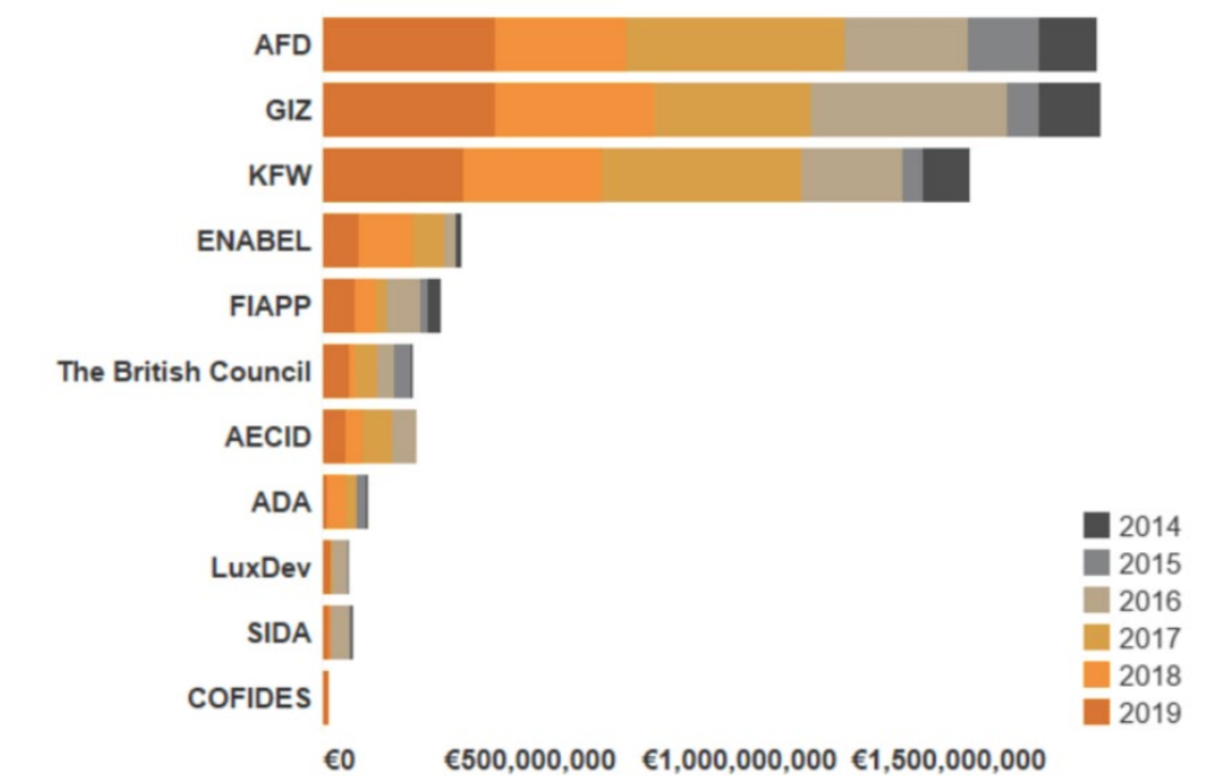
[2] See, for instance, the 2014 Regulation laying down common rules and procedures for the implementation of the Union's instruments for financing external action, Art 4.12: "In implementing its support to transition and reform in partner countries, the Union shall, where appropriate, draw on and share the experiences of member states and lessons learnt" (EC 2014).



Top EU bilateral aid agencies awarded the European Commission's external action funding by year, 2014-2019.

Source: Alceya, R. 2021

There is growing demand and pressure from small and medium sized EU member states to be more involved in implementing EU aid programmes through more diverse modalities and instruments, while balancing the necessity for open competitive processes that favour those agencies most likely to generate results. In 2016, a strategic evaluation on EU delegated cooperation (Ecorys 2016) found that it had mainly contributed to strengthening relations between the EU and only some implementing agencies. Several EU member states, including EU member states that do not have their own specific development agencies, have stressed their interest in being more engaged in the implementation of EU external action via EU budget management modes and delegated cooperation agreements (including indirect management of EU aid under contribution agreements). This means simplifying rules and procedures and creating more opportunities and incentives for interested member states' agencies or operational structures to manage EU funded projects.

Based on the above considerations and arguments, inclusiveness can be approached from different angles and promoted at various levels.

Table 2: Promoting inclusiveness at different levels

Institutional angle	***Operational angle***
Looks at how member states can engage on an equal footing in the institutional decision-making processes, especially at Council level, as well as in informal dynamics and networks.	Looks at how member states (and their agencies or DFIs) actively engage in the implementation of EU development cooperation activities and access EU funds to this end.

Promoting inclusiveness at the policy level	*Promoting inclusiveness at country level*
EU policies are shaped together and reflect the diversity of interests, expertise, priorities and approaches of member states.	Member states (and their agencies or DFIs) and EU delegations communicate, collaborate and cooperate with each other at country level.

3. Understanding bottlenecks and obstacles to inclusion

As for many policy priorities, the major challenge regarding inclusiveness is the operationalisation. Despite wide recognition of the importance of inclusiveness, a number of bottlenecks and obstacles are still holding back progress. Closing the policy-to-practice gap is crucial to ensure that the EU and member states can effectively work better together in an inclusive manner.

From our analysis and interviews with EU member states - big and small - agencies, EU institutions and delegations, some of the most commonly cited obstacles and bottlenecks for inclusiveness generally pertain to: 1) the wide diversity of actors and structures; 2) the limited capacity and field presence of smaller member states; 3) cumbersome EU administrative and bureaucratic processes with high transaction costs; 4) path dependency; and 5) competition between actors.

3.1. A wide diversity of organisational and operational structures for development cooperation

The single-most challenging factor, which is also one of the EU's strongest playing cards, is the big diversity between member states, in terms of their organisational and operational structures for development cooperation as well as their resources and modes of operation. Development cooperation of the new member states is largely directed at their immediate neighbours where they benefit from their historical experiences and 'transition expertise'. While the diversity and complementarity of EU member states' experience and expertise is an asset for the EU collectively, these differences have also created an uneven playing field - which the principle of inclusiveness seeks to level up.

Large differences exist in the types, size and scope of development cooperation structures across EU member states (Jones et al. 2019). On one side of the spectrum there are member states with dedicated implementing agencies, long-standing experience and significant aid budgets, and on the other, there are member states with very limited experience, implementing capacities and resources. A majority of member states have set up dedicated operational entities in charge of funding and/or implementing development cooperation activities. There are, however, important differences in terms of mandate, scale of action and capacities of these organisations. In another group of member states, development cooperation departments within the Ministry of Foreign Affairs are in charge of the overall coordination of ODA and funding activities, but implementation is usually carried out by other actors (e.g. multilateral organisations, NGOs, consultancy companies, etc).

Member states and their operational structures, including DFIs, also make use of a wide range of financial and non-financial instruments for their bilateral development cooperation, ranging from grants, loans, blending, to technical assistance. Beyond financial modalities, several member states have also developed considerable expertise in non-financial means of implementation, such as the provision of public sector expertise and knowledge-sharing, including through twinning, Technical Assistance and Information Exchange - TAIEX and triangular cooperation.

While the EU's development cooperation policy and the NDICI seek to make an enhanced and complementary use of all these various cooperation modalities and approaches, it remains a challenge to coordinate and involve all actors – including traditional development actors as well as newer actors – in an inclusive manner.

3.2. Limited capacity and resources of smaller member states

For smaller member states/agencies, one of the main obstacles to inclusiveness is their limited capacity and scope of action, notably in terms of financial and human resources, which makes it more difficult for them to provide the right level of expertise and to engage in EU development projects. This is particularly true for large-scale projects with high threshold criteria that are difficult to satisfy especially for smaller member states or agencies, thus limiting their participation to smaller portfolios.

Accessing - and processing - information is a major challenge for many small administrations. Some have pointed out that they do not receive sufficient or timely information about EU projects and opportunities. When they do, their limited knowledge and understanding of EU contracting procedures makes it difficult to keep up with the long negotiation and formulation procedures and respond in short contracting timeframes. Moreover, strict monitoring and transparency requirements, as well as language requirements (e.g. French in Africa), or demonstration of track record of expertise, tend to favour larger and more experienced organisations. Poor and slow communication between field and HQ in member states' capitals can also be problematic, especially for more centralised administrations.

Furthermore, the lack of field presence of many smaller member states and their limited diplomatic representations - notably in Africa – is a major obstacle. Due to their history and geographical location, most of the BCEE countries often focus on their immediate neighbours. Many small and medium sized countries and smaller administrations have very few embassies, development agencies or development banks in Africa, which makes it even more difficult or impossible to be informed of relevant information at country level. Furthermore, participating in joint programming or joint implementation processes without a presence on the ground is impractical. Some progress was made over recent years by some EU delegations in terms of information-sharing, and dialogue with the Commission at HQ level, notably through the Council and meetings of Director Generals, as well as through the Practitioners' Network (PN) for European Development Cooperation.[3] Yet, not all member states are members of the Practitioners' Network and several member states' agencies still have a very limited or no Brussels-based presence.

More established member states' agencies also see the added-value of being inclusive and complementary and there is increasing pressure on them (notably in terms of image) to be more open, including by partnering and sharing knowledge with others. For them, the major bottlenecks relate to the additional costs (human and financial) incurred to include smaller agencies in development projects where they are in the lead (e.g. in the form of co-delegation, sub-contracting, or as junior partners).

3.3. Cumbersome administrative and bureaucratic processes

The execution of the EU budget and use of EU funds is subject to strict sound financial management and transparency rules which the member states, the European Court of Auditors and the European Parliament monitor closely. As stipulated in the Financial Regulation applicable to the general budget of the Union (European Parliament/Council of the EU 2018), indirect management of EU funds can only be attributed to entrusted entities

[3] http://www.dev-practitioners.eu/.

("pillar-assessed") that can demonstrate a level of financial management and protection of the EU financial interests equivalent to that of the Commission. Passing the pillar assessment is thus a necessary process to grant a minimum credibility to the EU and its member states Development Cooperation Agencies. Yet, it is a lengthy and cumbersome process – especially for smaller member states and agencies.

One challenge relates to the EU regulations and procedures on delegation of powers, according to which only recognised 'member state organisations'[4] are eligible for indirect management. In 2018 (European Parliament 2018), 32 Member State Organisations (MSOs) had been formally recognised and accepted by the Commission, entitling those MSOs to become eligible for indirect management. In recent years, several agencies of smaller member states have been - or are in the process of being - pillar assessed (e.g. Central Project Management Agency (CPMA), Czech Development Agency (CzechAid), Romania's International Development Cooperation Agency (RoAid), Slovak Agency for International Development Cooperation (SlovakAid)). Several EU member states - including those without development agencies - face similar challenges when it comes to implementing, or seeking to implement, EU aid programmes through indirect management. One recurring concern remains how to facilitate this process with a view to increasing the number of MSOs that are recognised as such and can implement EU-funded projects.

The EU institutions, the Commission and European External Action Service (EEAS) in particular, have the mandate to coordinate EU development cooperation and promote inclusiveness. Yet, they also face a number of challenges stemming from their own bureaucratic processes, notably long negotiations and formulation procedures and strict transparency requirements, which limit their margin of manoeuvre. In such circumstances and short contracting timelines, it takes additional resources and personal commitment (time and human resources) to reach out to and crowd in smaller member states that are not present. The situation often varies from country to country, depending on incentive structures in EU delegations and personal relationships in the field.

3.4. Path dependency

Pressure to disburse funds rapidly and to implement projects quickly create a certain path dependency for the EU institutions. Indeed, to reduce their own administrative burden it is easier for the Commission and the EU delegations to work directly with bigger agencies that have a strong 'footprint' in partner countries or in a given sector. Hence, there is a preference to work with pillar-assessed organisations or DFIs that are already active and experienced, and are operational immediately in the field. This creates a more exclusive relationship between these agencies and the EU institutions. In addition, there is also political/geopolitical pressure to favour larger member states or those with a longer history or political ties who can bring more leverage in particular geographic settings.

3.5. Visibility and competition between EU actors

Another obstacle, although less obvious to claim, is the increasingly competitive environment for development cooperation. The fact remains that member states and their agencies are also competitors in a limited market. They often want to maintain their autonomy of action, separate identities and own visibility.

Trade and private sector engagement are increasingly important dimensions in EU development cooperation. This represents an opportunity for member states that do not have strong experience in development cooperation or with limited field presence, but who are keen to crowd in private investment and trade opportunities in certain

[4] According to the EU Financial Regulation a Member State organisation is "an entity established in a Member State as a public law body or as a body governed by private law with a public service mission and provided with adequate financial guarantees from the Member State" (Euro Parliament/Council of the EU 2018: p. 28, para. 42).

areas. This also brings in more competition between member states as they also seek to promote and advance their respective national economic and political interests.

Bigger member states and agencies are not as adamant and vocal about inclusiveness and are sometimes perceived as contributing to maintaining the status quo. But there is increasing pressure on them (notably in terms of image) to be more open to 'competition'. There is indeed also a question of reputation at play as agencies generally prefer to display an image that is open and collaborative rather than exclusive or aggressively commercial when it comes to implementing EU-funded projects. The Commission also cannot afford to give the impression that it favours some actors more than others to implement EU-funded development cooperation projects. Yet, the Commission is also under enormous pressure in competitive funding processes to be able to clearly demonstrate that the best bid won against objective criteria aimed firmly at results.

4. Fostering inclusiveness: homework and opportunities with NDICI programming and Team Europe

Inclusiveness is a two-way street and there is homework for everyone in making it a reality: EU institutions, member states - big and small - and their implementing agencies and DFIs should all play a role in this endeavour. Beyond the good practices and collaboration initiatives that should be encouraged and replicated, there is also an important momentum and opportunity to be seized right now with the programming and implementation of the Neighbourhood, Development and International Cooperation Instrument (NDICI) 2021-2027 and the consolidation of the Team Europe approach.

4.1. Working better together and in an inclusive manner is a two-way street and requires homework for everyone

4.1.1. For the EU institutions

As per its mandate to coordinate the EU and the member states' development cooperation, the Commission is best placed to carry out activities aimed at bringing member states together in the field through the EU delegations, and to provide all the necessary information on opportunities for joint activities under EU-funded projects.

Fostering inclusiveness requires, first and foremost, information-sharing and in a timely manner to all member states - including those not present in partner countries. More efforts should thus be made by Commission services and EU delegations to reach out to member states in capitals and non-resident Ambassadors. Swifter and more systematic information-sharing could be supported by the use of digital tools, such as virtual platforms and online meetings, which have been widely used and become the new norm under COVID-19. Yet, while digital tools offer new ways of working and interacting remotely, they are not a panacea and there are also limits to virtual meetings (e.g. loss of informal/personal dimension, difficulty to combine differentiated physical and virtual participation in meetings).

Capacity-building and targeted technical support could also contribute to creating a level playing field between member states. Where relevant, the Commission could look into gauging the needs and providing technical support and assistance to smaller and less experienced member states in the area of development cooperation. This was done, for instance, between 2007 and 2020 by providing technical and policy expertise on development policy issues to support EU13 member states during their first Presidency of the Council of the EU. Consideration could be given to extend EU support to interested member states in setting up their own national development cooperation operational structures with a view to implementing and managing EU-funded projects. For example, support in passing the pillar-assessment is a recurrent ask from several national agencies, DFIs or development organisations, and the provision of expertise could be envisaged for this purpose (cf. mirroring the EU Structural Reform Support Service mechanism in place to provide support and expertise for needed internal reforms in member states). Support could also be provided by, or facilitated through, relevant networks (such as the Practitioners' Network or the association of European DFIs) - in the form of technical assistance, peer exchange, etc, The provision of support should also in itself be inclusive and not constrained by being already members of specific networks or associations.

The simplification of procedures for contracting or passing the pillar assessment could also facilitate inclusiveness, although the scope seems limited due to strict accountability requirements. Yet, the new Operational System (OPSYS) recently launched by the European Commission as the new one-stop shop to manage and provide information on all contracting and implementation phases for EU external action projects holds potential for more transparency and effectiveness.

At country level, the EU Delegations play a key role to facilitate inclusiveness. This often varies greatly from country to country and often depends on personal initiative from European Union Delegation (EUD) staff and/or personal relations between individuals at country level. More systematic efforts should be encouraged to ensure that EU Delegations reach out proactively to member states and agencies beyond the usual suspects, including those that are not geographically represented in the country. This could, for instance, be encouraged through specific guidelines on outreach and consultation, electronic tools and mailing lists, and incentive mechanisms. This is particularly important in the context of joint implementation to ensure that all member states that have expressed interest or have relevant expertise are informed and involved in relevant discussions. In turn, member states are invited to express their interest and to engage in EU joint processes, where appropriate.

At country level, it is also important for EU delegations to facilitate the representation of member states that are not present in the field. In particular, the EUD could envisage hosting representatives of member states or their agencies that do not have country representations or Embassies. The opposite is also true, and several member states' Embassies can also host antennas of the EU Delegation, such as Portugal in São Tomé and Príncipe.

Consortia between member states - and their respective agencies and DFIs (big and small) - could also be further encouraged and incentivised. For instance, the Commission could trial, in a limited number of cases, specific requirements on demonstrating inclusiveness in response to specific initiatives it would fund. The group of wise persons on the EFAD suggested giving preference to joint or parallel financing proposals submitted by more than one institution (Council of the EU 2019b). Such requirements could be made compulsory when bidding for certain EU contracts. Arrangements could, for example, reward (e.g. bonus points for joint offers, indirect costs covered) larger and more experienced member states and their agencies working directly with less experienced ones with different skill sets and knowledge. An equitable distribution of resources and key roles would have to be developed within this. Usually smaller member states or agencies team up with a bigger agency (as junior partner) but in certain circumstances the smaller member states agency should be in the lead role (e.g. in Eastern Neighbourhood countries such as Ukraine or Moldova, CPMA or RoAid are lead donors, in Angola the Camões I.P. is lead with AFD as co-delegate).

In order to promote the wealth and diversity of European cooperation, it is important that EU delegations showcase the European 'offer' from the EU institutions as well as all member states, including those that are not present in the country. This can be done notably through a mapping exercise of EU member states capabilities/expertise and their activities, sharing of experiences and best practices including through public sector expertise, staff exchange and the establishment of a pool of experts that may be mobilised at all times. The setting up by the European

Commission with the support of Estonia of a European Union digital portal connecting EU goods and services for COVID-19 and beyond is a good opportunity to promote the EU collective offer in terms of expertise and services and facilitate matchmaking with needs in partner countries. It can also contribute to giving more visibility to smaller member states.

4.1.2. For the member states

Encouraging more systematic and structured collaboration and partnerships between the member states and their agencies could contribute to fostering inclusiveness. Past research from ECDPM (Jones et al. 2019: unpublished) has shown that there is considerable interest among development cooperation agencies and operational structures to further collaborate and share knowledge and experience. There are already a number of good practices and innovative approaches of collaboration ranging from staff exchange, study visits, signing of MoUs on working arrangements, etc. Overall, member states with smaller ODA resources and limited operational capacities are keen to learn from others with a view to upscaling their own development cooperation activities and engage more in joint activities and EU funded projects. Larger member states or agencies that already have a wide range of expertise and good access to EU funded projects are interested in further enhancing the complementarity of their actions. One way of doing so is to agree on mutual recognition of and reliance on their procedures for joint activities. Mutual reliance on rules and procedures among EU development agencies and DFIs (including pillar assessed ones) is under discussion but still far from consensual.

Partnership agreements (e.g. multi-partner contribution agreements) or project consortia between member states/agencies (big and small) are a good way to promote inclusiveness operationally. These exist but are mostly done bilaterally on an *ad hoc* basis, and our research so far hasn't identified collaboration agreements and partnerships on a more macro or institutional level. Yet, there would be a value in encouraging partnerships and collaboration in a more structured and systematic way, notably concerning partnerships on EU-funded cooperation projects. Member states' organisations and networks such as the Practitioners' Network could also play a key role to this end.

In accordance with its mandate to enable exchange of information and experiences among its members, the Practitioners' Network seeks to encourage and facilitate peer exchange between European practitioners, notably by providing an appropriate platform for networking and knowledge-sharing, especially on operational and financial issues related to EU development cooperation. In recent years, the Practitioners' Network has also taken various steps to increase its own membership and representativity by reaching out to EU member states that do not have development agencies and involving them in relevant activities and the broader EU architecture from a practitioners' perspective. The Practitioners' Network has also issued a joint declaration at the Finance in Common Summit in Paris on synergies with public development banks for more development impact (Practitioners' Network 2020).

Many member states now have, or are setting up, operational structures (agencies and/or development finance institutions) for implementing development cooperation activities. Smaller and medium sized member states and agencies are also encouraged to identify and promote their thematic and/or geographic niche areas of expertise where they can bring added value/comparative advantage. Yet, this investment is mainly a political decision and not one that agencies can take on their own initiative. For instance, there is hardly anything an agency can do if there is no political consensus as to the role of development cooperation and appropriate resources attributed for it. Furthermore, identification and specialisation in niche areas must be reconciled with EU priority setting in view of funding opportunities. Yet, it is hard for less experienced agencies to demonstrate expertise without proving a solid track-record of significant projects implemented in this given area. This can lead to a vicious circle as the lesser participation there is from smaller and less experienced member states, the less political interest and support there is from their own constituency and leadership to engage in development cooperation.

4.2. Seizing and operationalising opportunities in the NDICI programming and Team Europe Initiatives

4.2.1. Joint programming and joint implementation of the NDICI - Global Europe instrument

The NDICI - Global Europe regulation and programming guidelines set new rules of the game (Di Ciommo and Jones 2019) that provide new hooks and opportunities for working better together in an inclusive manner. In addition to recognising the principle of inclusiveness, it stipulates that the EU should finance actions under this instrument to support partnerships, notably by "fostering greater inclusiveness and collaboration of all actors in the implementation of development cooperation and external action policies, seeking to share lessons learned, maximise capacities, added value, excellence and experience, thus reinforcing common goals, values and interests and the ambition of working better together" (European Parliament 2021: 91, para. 7c).

Inclusiveness can and should be one of the driving principles in the context of the NDICI programming exercise, especially as it seeks to promote joint programming as the preferred approach and to make more strategic and direct linkages with joint implementation (EC 2021).

The NDICI also opens avenues and possibilities to integrate a wider range of policy areas and actors in the programming discussions. In doing so, it should draw on the wealth of experience of all member states. EU cooperation in a wider range of policy areas beyond traditional development, notably on climate and digital, calls for a wider mobilisation of resources and expertise that can be drawn from more member states, including smaller ones that may have developed sectoral or thematic expertise in relevant areas.

The NDICI also seeks to make use of a wider cooperation toolbox encompassing various modalities (such as grants, loans, blending, technical assistance), some of which are more flexible, less costly and arguably more accessible to smaller and medium sized member states (such as TAIEX, twinning and other public sector expertise forms of cooperation…). There is a notably growing interest to make a wider and more strategic use of public sector expertise (PSE) as an innovative and complementary source of expertise for cooperation with partner countries, either alone or as part of wider actions such as Team Europe Initiatives and actions that encompass, for example, budget support, policy dialogue or technical assistance under the EFSD+. As PSE is also a favoured modality for several smaller agencies, promoting and simplifying the mobilisation of PSE by EU institutions and member states could lead to a more inclusive and effective international cooperation (Di Ciommo and Sergejeff 2021: forthcoming).

The future governance of the NDICI (and of the EFSD+) is a major opportunity to foster inclusiveness and to establish regular dialogue and closer exchanges between the EU institutions, the member states, the implementing organisations as well as development finance institutions. This opportunity should be fully seized to enhance inclusiveness. The governance of the NDICI should allow all member states to have a role in the strategic steering of the instrument, beyond the programming and mid-term review phases which are decided in comitology (Jones et al. 2018). Given the broad scope of the NDICI which covers several policy and geographic areas, its governance would potentially involve a multitude of working parties in the Council that currently discuss relevant thematic and geographic issues separately. This calls for an update of their respective mandates and working arrangements, while bearing in mind that the governance should remain nimble and processes manageable to respond to all priorities in a rapid and flexible manner.

4.2.2. Maintaining and upscaling the momentum on Team Europe

The Team Europe approach has created a strong momentum to improve the coherence and coordination efforts of EU actors, both institutionally and at country level. It has set a dynamic of closer dialogue and cooperation and allowed a less bureaucratic way to engage with member states, their implementing organisations and financing institutions, as well as the EIB and the EBRD. The Team Europe approach potentially brings added value to the existing joint programming and joint implementation processes. Yet, operationally there is a need to clarify linkages between the Team Europe approach and the “working better together” framework. The member states’ buy-in will be essential for the success and sustainability of the Team Europe approach.

In particular, the Team Europe Initiatives that are being designed as large-scale European projects provide an opportunity to foster inclusiveness. They explicitly seek to involve the member states and other European partners (DFIs, implementing agencies, EIB/EBRD) and to combine a mix of implementing modalities from all Team Europe players in order to bring a transformative impact in partner countries. In this regard, the online regional seminars carried out for the elaboration of Team Europe Initiatives involved all EU institutions and member states and were seen as a good way to engage with all member states (including those that are not present on the ground but that may have resources/expertise to contribute) in the initial stages of the process. While Team Europe Initiatives are mostly field-driven, there is a strong request from member states to keep the momentum and level of consultation. Yet, it is also important for the member states to follow up their expression of interest in relevant TEIs and engage in the process proactively.

While TEIs are still in the making for most of them, a first look at some of the proposed Team Europe Initiatives (Chadwick 2021) suggests that they are dominated by a few major players, notably France and Germany - which feature in more than two-thirds of TEIs - followed by the EIB and Spain. Several smaller member states, such as the Netherlands, Sweden, and Belgium participate in less than 15 TEIs (Pleeck and Gavas 2021). Moving forward, it will be crucial that the TEIs are jointly designed, implemented and monitored in an inclusive manner to further promote the Team Europe approach and inclusiveness at country level. In particular, efforts are needed to ensure regular dialogue and close strategic coordination between the various Team Europe members, at HQ level and at country-level. It will be important to identify opportunities and incentives for all interested players to remain engaged throughout all stages of the process. Furthermore, while largely donor-driven, Team Europe Initiatives should also involve other partners (NGOs, private sector, multilaterals) and local stakeholders.

5. Conclusion

The principle of inclusiveness has become increasingly prominent in EU development policy, both as a central aspect for the ‘Working Better Together’ agenda and a key ingredient of Team Europe. There is a broad agreement nowadays on the strong political value and operational gains of inclusiveness. Beyond the thorny question of equitable access to EU funds and the fair share of return on investment, inclusiveness is also about agreeing collectively on policy orientation and projecting an image of Europeanness. In addition, inclusiveness is not an end in itself and should clearly link to development effectiveness and improving Europe’s role and impact in the world, with clear gains to be measured in these areas.

Yet, a number of obstacles and bottlenecks at the institutional level and at country-level are still holding back progress on joint work and inclusiveness in practice. The single-most important challenge - which is also one of the main EU and member states’ collective assets - is the diversity between the member states and their respective agencies/DFIs (in terms of size, structure, field presence, resources, capacity, etc…). These differences need to be properly acknowledged and acted upon. Fostering inclusiveness implies addressing a number of other bottlenecks, including EU bureaucratic processes, a certain path dependency to work with more established organisations as well as competition between actors. Putting in place incentives, both at the institutional and operational level, is therefore needed to bolster inclusiveness.

As inclusiveness is a two-way street, it requires the investment and commitment of all actors including the EU institutions, member states, implementing agencies and DFIs. In particular, the EU institutions could work towards swifter and more systematic information-sharing with all member states, facilitating capacity-building and simplifying procedures. At the country level, EU Delegations should be encouraged and supported to reach out proactively to member states, agencies and DFIs beyond the usual suspects, including those that are not geographically represented in the country but have expressed an interest in engaging in cooperation. Member states, their agencies and DFIs should also promote collaboration opportunities between themselves, notably by fostering more systematic and structured collaboration and partnerships including and beyond EU-funded development projects. Smaller and medium sized member states and agencies are also encouraged to identify and promote their thematic and/or geographic niche areas of expertise and to engage proactively.

The (joint) programming of the NDICI and the Team Europe Initiatives that are an integral part of this process offer important opportunities for the EU and member states to work better together in an inclusive manner. There is indeed a strong momentum and a window of opportunity to create new ways of collaboration between a wider variety of European actors under the Team Europe banner.

Yet, initiatives aimed at fostering inclusiveness should also be undertaken with the interest of partner countries and the delivery of global public goods in mind. The EU and member states are stronger together and can deliver more than the sum of the parts when they act jointly, but this must not be done at the expense of country ownership. A too European-focused approach or inclusiveness for the sake of it without a clear focus on effective development partnerships and results will likely backfire.

Bibliography

Alcega, R. 2021. Are EU development contracts concentrated in too few hands? New data sheds some light. Devex, 17 March 2021.

Balazs, S-I. and Lightfoot, S. 2015. Central and Eastern European transition experience in EU development policy. University of Pittsburgh.

Chadwick, V. 2021. A first look at the 'Team Europe initiatives'. Devex, 15 March 2021.

Cibian, S. 2020. Central & Eastern Europe and EU–Africa Relations After 2020. Chatham House, Research Paper, 19 November 2020.

Council of the EU. 2017. The New European Consensus of Development 'Our World, Our Dignity, Our Future'. Brussels, 2 June 2017.

Council of the EU. 2019a. Council conclusions on Strengthening the European financial architecture for development. Brussels, 5 December 2019.

Council of the EU. 2019b. Europe in the World. The future of the European financial architecture for development. An independent report by the High-Level Group of Wise Persons on the European financial architecture for development, October 2019.

Council of the EU. 2020. Council conclusions on Team Europe Global Response to COVID-19 , Brussels, 8 June 2020.

Council of the EU. 2021. Team Europe - Council conclusions. Brussels, 23 April 2021.

Di Ciommo, M. and Jones, A. 2019. A necessary shake-up: EU programming for international cooperation. ECDPM Discussion Paper 263. Maastricht: ECDPM. November 2019.

Di Ciommo, M. and Sergejeff, K. 2021. Study on the EU and its member states mobilising Public Sector Expertise for Development - Phase II – analysis paper. ECPDM Discussion Paper 299. Maastricht: ECDPM. 8 June 2021.

Ecorys. 2016. Evaluation of the EU aid delivery mechanism of delegated cooperation (2007-2014). Final report.. Volume 1 – Main report. Evaluation carried out on behalf of the European Commission. November 2016

European Commission. 2014. Regulation EU) No. 236/2014 of the European Parliament and of the Council: laying down common rules and procedures for the implementation of the Union's instruments for financing external action. European Commission, Brussels, 11 March 2014.

European Commission. 2020. Report from The Commission to the Council on the recommendations of the high-level Group of Wise Persons on the European Financial Architecture for Development. European Commission, Brussels, 31 January 2020.

European Commission. 2021. Tools and Methods Series. Guidelines N° 10. Working Better Together as Team Europe: Through joint programming and joint implementation. Guidance, January 2021.

European External Action Service. 2016. Shared Vision, Common Action: A Stronger Europe. A Global Strategy for the European Union's Foreign And Security Policy. European External Action Service, June 2016, Brussels.

European Parliament., 2008., Report on the Challenge of EU Development Cooperation Policy for the New Member States, 2007/2140(INI).

European Parliament. 2018. 2017 Discharge to the EDF: written questions to Commissioner Mimica. Hearing of 8 November 2018.

European Parliament. 2020. 2019 Discharge to the Commission and to the EDF - written questions to Commissioner Urpilainen. European Parliament, Brussels, Hearing of 1 December 2020.

European Parliament. 2021. Proposal for a regulation of the European Parliament and of the Council establishing the Neighbourhood, Development and International Cooperation Instrument - provisional agreement resulting from interinstitutional negotiations. Brussels, 15 March 2021.

European Parliament/Council of the EU. 2018. Regulations (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018. Brussels, 30 July 2018.

Jones, A., De Groof, E. and Kahiluoto, J. 2018. Governing a new broad instrument for EU external action: The ins and outs of the institutional power struggle. ECDPM Briefing Note 107. Maastricht: ECDPM. 3 December 2018.

Jones, A. et. al. 2019. Study on EU member states' operational development structures and systems: Mapping and Needs Assessment. Commissioned by the Practitioners' Network and carried out by ECDPM, *not published*.

Jones, A. and Teevan, C. 2021. Team Europe - Up to the challenge? ECDPM Briefing Note 128. Maastricht: ECDPM. 25 January 2021.

Official Journal of the European Union. 2016. Article 210 (ex Article 180 TEC). C 202/142. Brussels, 7 June 2016.

Pleeck, S. and Gavas, M. 2021. Getting to the Bottom of the Team Europe Initiatives. Center for Global Development. 12 May 2021.

Practitioners' Network. 2020. Declaration on Synergies with Public Development Banks by the Practitioners' Network Members, Finance in Common Summit. Practitioners' Network for European Development Cooperation, 12 November 2020.

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