

1. On the State of play of RMIP (general introduction)

Terres des Hommes

« Actions in country in complex settings » : Il y aura-t-il une liste spécifique des pays concernés ? Le MAAP présente 11 actions pour un total de 534 millions d'euros pour un solde de 2,4 milliards d'euros. Seriez-vous en mesure de fournir des éléments sur les modalités de financement pour le reliquat (différence entre 2.4 milliards et 534 millions) ?

The SSA MIP includes dedicated resources for 'Actions in countries in complex settings' to ensure that funding is secured for such countries in the Sub-Saharan region without a MIP. As it stands, countries in Sub-Saharan Africa considered as complex settings are Burkina Faso, Mali, Niger and Sudan.

As per uncommitted allocations, today there are amounts available under the soft priorities for a total of approximately 330 MEUR, and about 1.6 billion euros for Support to Investments aimed at blending and guarantees operations. The difference can be explained by ad-hoc increases of EU contribution to ongoing actions such the Flexible Mechanism or the MPRR programme.

AVSI EU Affairs

One point that we consider very important and essential in the current strategy is to be clear, informative, and transparent about how civil society organizations will be involved and collaborate with the private sector. On this issue, there is a need for mutual support on how to approach the private sector and, conversely, how the private sector can benefit from the presence of CSOs. Another issue we would like to highlight is that we believe it is useful to pre-select or directly assign civil society organizations in particularly complex contexts or where there is a certain expertise of specific organizations, but it would be helpful to better inform the latter about the methods and process, where possible. In the new reorganization and possible consolidation of European Union delegations, regional programs must be taken into consideration, and it would be useful to be able to identify permanent reference personnel. In view of the upcoming MFF, can we assume that regional programs such as those carried out in recent years, precisely because of their complexity and scope, will continue to exist and that financial allocations will be safeguarded in the name of predictability rather than flexibility?

The regional programme is proving itself as an effective and efficient tool to deliver EU policy in Sub-Saharan Africa, hence we would envisage a strategic role of the programme and the approach in the next MFF.

We take note of your concerns, and we will reflect on how to ensure a more structured or predictable collaboration with the private sector.

Save the Children

Priorities: We acknowledge the focus on green and resilient economic transformation, which remains prominent in the upcoming AAP, with increased opportunities for direct CSO engagement. Compared with the SSA MAAP 2024–25, we would appreciate a stronger focus on the following areas, which appear to be missing in the current planning: Climate Displacements in Sub-Saharan Africa and Agricultural Value Chain Support. Modalities: Overall, there is a limited number of actions implemented through CSOs. The number

of actions implemented directly through CSOs remains low – an ongoing and concerning trend observed over the past years.

The AAP 2026 brings two actions which cover these specific priorities: 1. Climate Mobility in the Horn of Africa (36M EUR) and 2. Peste des Petits Ruminants (50M EUR). We are aligned as these sectors are included in the current planning.

DSW

We are concerned that only one action will be dedicated to Health (with funding of €55 million) in 2026. This is unfortunately in line with the outcome of the NDICI Mid-Term Review, which resulted in a €50 million reduction to the Human Development envelope, with €40 million of these cuts affecting the health budget. This allocation is not aligned with the EU's ambitious political commitments, such as those outlined in the EU Global Health Strategy. It also contradicts the Council of the EU's request in its January 2024 Conclusions on the Global Health Strategy to “collectively enhance financing for global health at global, regional, and national levels.” This low level of funding to human development puts also into question the EU’s achievement of the 20% human development target. Through the implementation of the sub-Saharan regional programmes, the EU seems far away from reaching the 20% target commitment. In addition, the global health sector is among the hardest hit by ODA cuts globally – especially since the halt of many USAID-funded health programmes, which is having severe consequences on partner countries’ capacity to sustain their health sector, and have forced many CSOs to stop their life-saving programmes.

*Thank you very much for raising these important concerns. We fully understand the sensitivity of the issue, particularly in the context of global ODA contractions and the sharp consequences of the recent US funding interruptions for partner countries and civil society. Allow us to reiterate that the AAP 2026 must be read within the full MFF cycle: a very substantial share of the regional Human Development envelope – including major SRHR and health investments – was already programmed between 2021 and 2025 and will continue delivering throughout 2026–2029. The MTR did **not** reduce the Human Development allocation under the SSA regional MIP.*

The EU remains strongly committed to global health and SRHR, in line with the EU Global Health Strategy and the Council Conclusions. Beyond the 2026 pharma action, the region continues to benefit from significant ongoing EU and Team Europe programmes covering SRHR, MNCH, UHC, health system strengthening, Africa CDC–ECDC cooperation, manufacturing and regulatory capacity, and health workforce support. These programmes represent several hundred million euros and contribute to the EU’s overall 20% human development target, which is assessed at NDICI level, not on a single action-year basis.

We note your recommendation regarding a potential dedicated SRHR action in 2027. While no decisions can be anticipated at this stage, your inputs will be considered as part of the broader reflection for the next AAP, alongside other priorities and programming constraints. We remain committed to maintaining an open and transparent dialogue with civil society as we advance in the process.

PLATFORMA

In the new paradigm of the EU development policy with the Global Gateway strategy at its core, an effective coordination between public and private actors along with multi-level dialogue involving the EU, national, and local levels is essential for achieving policy coherence for development, embedded in the objectives and principles of EU's external action. In the framework of the Global Gateway, Local and Regional Governments (LRGs) are playing a crucial role in fostering local impact as well as investment sustainability. Therefore, local governments should be recognised as key policymakers, on par with national entities, and as providers or specific local expertise and knowledge that bridges the gap between private and public sectors. LRGs should be meaningfully involved in the identification, design and implementation of Global Gateway projects locally. To facilitate LRGs engagement and fully recognise them as actors and co-implementors of EU external policies, the EU should define clear multilevel governance mechanisms and provide support to decentralisation reforms, as well as targeted financial and technical support through dedicated funding instruments to lift the barriers LRGs face in engaging in EU development policies (i.e. institutional and legal restrictions, administrative and technical capacity constraints). We believe that decentralized cooperation (city-to-city or region-to-region cooperation) is instrumental in achieving EU development objectives, including in the framework of the Global Gateway, through multi-stakeholder partnerships involving LRGs alongside other actors. We recommend that the future programming beyond 2027 fosters and builds on these ongoing cooperations. We recommend that enhanced dialogue between LRGs and EU Delegations are fostered by the EU, so to strengthen EU Delegations' engagement with local and regional governments and their national associations. LRGs, as closest level of government to the citizens, are often the only functioning public institutions in fragile and conflict-affected areas, and first responders in crisis situations, providing essential services, humanitarian aid, and disaster response. In contexts where national governments struggle to act, LRGs ensure continuity of governance and social stability, acting as key partners in strengthening community resilience, peacebuilding, and crisis recovery. Through city diplomacy and local government associations, LRGs maintain open communication channels, fostering cooperation even in highly polarised political environments. Hence, LRGs should be acknowledged and empowered in their key role in providing ongoing support to populations in urgent need, notably in fragile contexts. Last but not least, with 46 ODA recipients out of 152 located in sub-Saharan Africa, it is essential to maintain ambitious targets for ODA spending, in line with the EU and Member States international commitments.

Although the City-to-City program is now coming to an end, the approach it championed continues strongly through other initiatives, such as the International Urban and Regional Cooperation (IURC) program managed by DG REGIO or the TAIEX mechanism for instance. These initiatives carry forward the principles of Decentralised Cooperation, advancing sustainable development while promoting knowledge exchange and capacity building. Furthermore, the new narrative for decentralised cooperation shows that it can be a powerful tool, and a strategic asset for the EU, fully relevant in regard to the current international context and global challenges we are facing, from growing urbanization and increasing inequalities to the climate crisis and fragility.

VNG

There now seems to be greater clarity regarding the implementation of the Global Gateway strategy, as 75% of the budget for actions planned in the MIP is proposed under this framework. However, the

operational modalities for contributing concretely to this strategy remain sometimes difficult to access, both at the level of European Union Delegations and among the member countries of the Team Europe Initiative. Greater transparency and predictability regarding grant allocation mechanisms would be highly appreciated. Furthermore, major infrastructure projects do not always sufficiently involve local governments and decentralized territorial authorities (ETDs), which can reinforce a perception of a top-down approach and generate tensions or misunderstandings at the local level

We agree that the involvement of local governments and ETDs are essential for the success of sustainable infrastructure projects. This is why the main goal for the 2025 Cities and Regions Forum was to showcase the concrete added value that Local and Regional Authorities bring to the EU's approach to international partnerships, particularly in the roll-out of Global Gateway and its 360-degree approach, including in fragile contexts. We aim to build on the lessons learned from the Forum and reinforce closer engagement in the future.

WWF

Feedback on identification and formulation missions and the programming process: Identification & formulation processes currently vary significantly from programme to programme. In some cases, EU Delegations organise partner consultations to inform the programme development, in other cases, external consultants are recruited and reach out to some stakeholders individually based on the EU's steer and their own network. Stakeholder interviews may be shaped either by EU Delegation recommendations or by the consultants' discretion. This variability affects the quality and inclusiveness of the process. We have noticed that in some cases, interviewed stakeholders do not always fully understand the strategic importance of this exercise. As a result, they may not involve the most relevant experts, may not allocate sufficient time to the consultation, and may therefore provide inputs that are incomplete or not sufficiently considered—ultimately affecting programme relevance and implementation quality. Also, in some cases, contracted consultants and in some cases the staff at EU Delegations are not fully familiar with the range of EU funding modalities and the rules governing their use. This can lead to challenges when designing partnerships and implementing modalities that require a more nuanced operational understanding. To address these issues and strengthen the quality, coherence, and transparency of programming processes, we recommend the following: - Establish a more systematic and transparent approach to identification and formulation missions, including early and proactive sharing of planned mission schedules with relevant stakeholders. This would enable partners to prepare adequately, ensure participation of the right experts, and contribute more substantively to the process. - Provide clearer guidance to stakeholders on the role and importance of formulation-related consultations, emphasising how their contributions shape programme design and subsequent implementation. This would help ensure that the appropriate level of expertise and engagement is mobilised. - Ensure that EU Delegation staff and external consultants involved in programming are fully trained on EU funding modalities and related operational rules, to avoid the design of partnerships or implementation mechanisms that later prove difficult to operationalise. - Encourage greater consistency in the consultation approaches used across programmes, promoting good practice, inclusiveness, and a structured methodology for gathering stakeholder

The new guidance to EU Delegations on the CSO Roadmaps includes a comprehensive analysis on strategic approaches and key lessons for civil society engagement in Global Gateway and aims to streamline CSO consultations on Global Gateway projects and areas in all EU Delegations and in particular to ensure early engagement. It includes support to an exhaustive stakeholder mapping, making sure that all relevant CSOs are taken into account. The new roadmaps will also ensure dedicated resources for structured dialogue on all these priorities.

Federation Humana People to People (HPP)

The Federation Humana People to People (HPP) welcomes the strong overall commitment of the Sub-Saharan Africa Regional MIP to human development, green transition and sustainable growth, as presented in the State of Play and MAAP 2026. We note, however, that within the remaining 28% of funds still to be committed, education – particularly teacher training and foundational learning – appears less visible than other pillars, despite being central to the Human Development priority and essential for achieving the Africa–Europe Global Gateway Investment Package. As a federation operating over 55 Teacher Training Colleges and large-scale education programmes across Sub-Saharan Africa, we emphasise that a strong teaching workforce is the backbone of all education, youth, skills and health outcomes. Without well-trained teachers equipped for inclusive pedagogy, digital and green transitions, SRHR education and climate resilience, broader investments in youth skills and value chains risk not reaching their full potential.

We therefore encourage the Commission to use the remaining programming space (AAP 2026 implementation and AAP 2027) to:

- Re-balance the portfolio with explicit regional actions on teacher training, foundational learning and continuous professional development, as key enablers for TVET, digitalisation, green skills, and youth employability.
- Ensure that grant-based windows remain available for CSOs and local teacher-training institutions, alongside blending and support to investments, in line with CSO recommendations on NDICI/Global Europe and Global Gateway.

We acknowledge the request for a strong focus on teacher training and foundational learning. The European Commission continues to prioritise basic education under the 360-degree approach of the Global Gateway strategy and implements basic education programmes at the bilateral level, which include a strong focus on teacher training and early learning.

On the Regional Programmes, the Regional Teacher Initiative (RTIA) is the largest regional Global Gateway Flagship addressing the shortage of 15 million teachers by 2030 in Africa. The RTIA is going into its second phase (2027-2030) and further Calls for Proposals and Windows for funding will open. We would like to confirm that two associations affiliated to HPP received a grant from the RTIA (ADDP in Mozambique and DAPP in Malawi). We would also like to inform about the Africa Europe Partnership to Exchange on Education Reforms (PEERS), which works with two Regional Economic Communities and focusses on

enhancing RECs coordination capacity around digital, inclusive and green education. The programme includes the production of evidence around the above areas, that can benefit the member states of the RECs in enhancing their basic education offers.

2. On the feedback to the contributions received

Terres des Hommes

D'après le diagramme page 6, aucun financement n'a été octroyé pour l'heure sur cette ligne et cela ne se ferait qu'en 2027. Pourriez-vous indiquer les modalités d'octroi de ces financements svp ?

The 238 MEUR available under the Complex Settings are under formulation and should be presented to the NDICI Committee early 2026 with a planned adoption in the first quarter 2026.

Annual Action Plans and measures are public and available on [Action plans - International Partnerships - European Commission](#). Implementation modalities will be identified under section 4 of the annexes.

You may also be interested in previously adopted measures to benefit the same countries in Western Africa and Sudan. Information available under the same link.

DSW

We appreciate the efforts to involve CSOs in dialogues and implementation of actions, as part of the regional programmes, and the recognition that CSOs are key for their local knowledge and capacity to build trust with communities. Still, as part of regional programmes in the area of health, very limited support is channelled through CSOs, despite civil society being fundamental in reaching out to more marginalised and affected communities, and having a crucial role in shaping social norms and behaviours, having a positive impact on health outcomes. We recommend including CSOs as key implementing partners of health actions at regional level – as they can contribute with technical expertise, representing the specific needs of affected communities. This should happen through open Calls for Proposals, accessible to CSOs. Multilaterals such as UNITAID should also be considered as key stakeholders.

We welcome your recognition of the valuable role civil society plays in regional health initiatives, particularly in reaching marginalised communities and shaping social norms that influence health outcomes. Your feedback underlines an important dimension of the regional portfolio, and we fully acknowledge the added value that CSOs bring in terms of proximity, expertise, and accountability.

At the same time, regional programmes often rely on specific implementation modalities—such as cooperation with regional organisations, UN agencies, or global health actors—to ensure coherence, economies of scale, and alignment with continental frameworks. These constraints can limit the share of funding channelled directly through CSOs at regional level. Nonetheless, civil society remains an essential partner, including through participation in governance structures, technical working groups, and targeted support through grant schemes and service contracts managed at national and regional levels.

Your recommendation to further explore CSO involvement, including through open and accessible Calls for Proposals, will be taken into consideration during the formulation of future actions, together with the full range of programming, operational and budgetary constraints. We equally take note of your suggestion to involve multilaterals such as Unitaid as relevant stakeholders, which we already do. We look forward to continuing this constructive dialogue as programming advances.

International Federation of ACAT (FIACAT)

Nous remercions la DG INTPA pour l'organisation de ces consultations annuelles avec la société civile. Nous souhaiterions, quand les informations seront disponibles, obtenir des précisions concernant l'évaluation du Global Gateway, les engagements envisagés pour le Sahel à la suite de la revue à mi-parcours, ainsi que recevoir des informations sur la publication des prochains appels à projets de l'UE dans lesquelles la FIACAT et son réseau d'associations locales (reconnues auprès des autorités nationales en matière de lutte contre la torture et d'abolition de la peine de mort) pourraient accompagner les autorités dans le respect de leurs engagements internationaux et régionaux en matière de promotion et de protection des droits humains.

Au niveau du siège, il n'y a actuellement pas d'appels à propositions ouvert dans ce domaine.

Les appels à propositions sont publiés sur le site internet de la DG Partenariats internationaux ou dans le portail [EU Funding & Tenders Portal](#), tandis que les appels à propositions locaux sont également publiés au niveau local.

VNG

As part of the Global Gateway (GG) initiative, large scale infrastructure projects will be implemented in many countries. We emphasize the importance of strong institutions and local governments capable of managing these infrastructures.

Reliable and sustainable funding for local governments is essential for delivering key public services, such as water supply, sanitation, waste management, and local economic development. To secure this funding, local governments need not only stable fiscal transfers from central governments but also a robust foundation of local Own Source Revenue (OSR).

EU-supported investments in sectors such as water supply, sanitation and waste management, systematically integrate in most cases capacity building and TA to ensure maintenance and sustainable financing of the investments. In some countries, the EU finances specific programmes, including through grants and budget support, to support decentralisation and sustainable financing of local authorities.

Federation Humana People to People (HPP)

We appreciate that several 2024 cross-cutting recommendations from CSOs – on CSO participation, bottom-up approaches and the climate–peace–migration nexus – were explicitly acknowledged in the

presentation, and are partially reflected in the MAAP 2026 actions (like for instance: Climate Mobility in the Horn, Peaceful and Resilient Borderlands, NaturAfrica II).

At the same time, our analysis of NDICI and Global Gateway continues to highlight three structural concerns:

1. Limited, and sometimes shrinking, direct funding opportunities for CSOs under geographic envelopes, with a strong shift towards entrusted entities and development finance institutions.
2. Insufficient transparency and inclusiveness in the mid-term review and Global Gateway pipeline discussions at country and regional level.
3. Risk that Global Gateway over-privileges large infrastructure and private-sector-led investments, while under-investing in the education, skills and community systems needed to make these investments socially and environmentally just.

We therefore encourage DG INTPA to:

- Systematically translate CSO recommendations into concrete design features of each Action (like for example, dedicated CSO components, minimum share of funds to be channelled via calls for proposals, formalised CSO roles in TEI steering).
- Share more proactively regional-level pipeline information, including on support to investments, so that CSOs and local authorities can organise strategically and co-create with EU Delegations.

We take note of both suggestions and will raise it internally.

3. On Human development (including health, gender, culture, youth and skills)

Terres des Hommes

D'après le diagramme page 6, le solde de cette ligne sera engagée en 2026 sans financement prévu pour 2027, pourriez-vous confirmer et expliquer svp ?

Tout en précisant que les montants sous le programme multiannuel régional sont indicatifs, il reste un solde de 14 300 000 Euros sous ce chapitre pour 2027 mais qui pour des raisons techniques n'est pas apparu sous le diagramme présenté lors de la réunion.

AVSI EU Affairs

We continue to hope that actions on these issues will always be considered a priority and that grants dedicated to these sectors will always be guaranteed.

Save the Children

Children and youth: We acknowledge the focus on youth in certain actions, but we note there is no concrete mention to children in the draft AAP 2026. Children should be an explicit target group through dedicated action(s). Without child-centred programming in a region where children under 14 years old account for over 40% of the population(*), the overall programme may substantially lack foundation for success, as many of the proposed actions will come to term, with the plan then to become locally owned and sustainable, when many of these children transition into young adulthood. Investing in their wellbeing, health and education, including foundational learning should be re-prioritised and included for the programme to succeed and EU investments to thrive.

(*) Source: World Bank Group data

Thank you for your comment and for highlighting the importance of children and youth in the SSA context.

Children's wellbeing, health and education remain core EU priorities and are addressed through other geographic and thematic instruments. Within the draft AAP 2026, this specific action does not target children directly; however, youth are among the prioritised groups in certain components of the action, notably where activities relate to skills development, workforce development, employability and participation in emerging value chains.

These elements are intended to contribute to longer-term sustainability and inclusive development outcomes, while remaining complementary to child-focused interventions supported through other EU programmes.

Further, the EU provides support to empower youth, connect and engage, in line with the Youth Action Plan for external action 2022-2027, both through consultative mechanisms such as the Youth Sounding Boards at country level and youth led initiatives.

IPPF

In September 2025, the US administration has published its "America first global health Strategy" and has started approaching partner countries, in particular in sub-Saharan Africa, to sign compacts. These compacts would be an agreement between the US and a government of a given partner country for this partner country to receive funding for health, in exchange for a number of commitments to respect. While this approach raises many questions in terms of balance, fairness and transparency from a general global health perspective, it also raises critical questions regarding sexual and reproductive health and rights (SRHR). Combined with the planned expansion of the Global Gag Rule, this approach could result in drastically constraining funding for SRHR and DEI, including from other donors such as the EU. We therefore call on the EU to: - Monitor the situation very carefully, including through connecting with other actors such as CSOs at country, regional and global levels. - Commit to continue funding SRHR at the regional level, but also at the country level and allocate additional funding to SRHR in the 2027 programming. - Support EU delegations in reaching out to partner countries' governments as well as RECs and highlighting the possible impact of the agreement (where appropriate) on services and other sources

of funding. - Coordinate with other donors, in particular European Member States to ensure a joint response to the US approach. On top of this situation, we would like to highlight the necessity for the EU to continue prioritising funding for SRHR at all levels, including at the sub-Saharan Africa regional level. While no funding is available specifically for SRHR in the 2026 programming, we call on the European Commission to allocate specific funding to SRHR in the 2027 programming and to ensure that SRH commodities will be part of the 2026 programme “Reinforce Pharma, Health Products and Technologies Value Chains”. Finally, we commend the European Commission for its joint work with Member States in the Team Europe Initiative on SRHR in sub-Saharan Africa, especially in designing and starting implement two jointly funded programmes, and we encourage the European Commission and Member States to continue design, fund and implement additional joint programmes in the region in the remaining years of implementation of the NDICI.

Thank you for these important comments and for highlighting the potential implications of recent US policy developments on SRHR. The EU remains firmly committed to promoting and protecting SRHR and will continue to monitor the evolving global context closely, including in dialogue with EU Delegations, Member States and civil society. Within the constraints of the current MFF and ongoing programming, the Commission will seek to maintain and, where possible, further strengthen SRHR within relevant regional and country programmes, including through the AU-EU health partnership Team Europe initiative and support to resilient health and pharmaceutical systems.

DSW

In addition to our concerns on the limited amount of funding to health in 2026, we are particularly concerned about the lack of any actions to further support sexual and reproductive health and rights (SRHR) in sub-Saharan Africa. SRHR are facing an unprecedented backlash globally, and in the SSA region particularly, especially fuelled by the new US administration, who has drastically cut their funding and has stepped back from a much-important rights-based approach to health and gender equality. We urge the Commission to implement actions to promote SRHR – supporting the TEI on SRHR – in its Action Plan for 2027. We welcome the reference made to building synergies between the different health TEIs, but would urge a doubling down in streamlining SRHR through different health actions, as SRHR is fundamental to achieve equitable, and good health for all (and particularly in light of the ongoing global backlash). Specific inputs – Action 1. Reinforce Pharma, Health Products and Technologies Value Chains We welcome the Action, with additional funding dedicated to strengthening the MAV+ initiative, supporting local pharmaceutical production and supply, enhancing capacities for regulatory functions. We welcome that the action will finance a support structure that will be responsible for working closely with the 5 health hubs (MAV+, SRHR, Health Security using a One Health approach (HSOH) Public Health Institutes (PHI) and Digital Health (DH) - “to ensure a coherent and coordinated approach throughout implementation”. We strongly recommend that the action also align with other relevant EU instruments, including Horizon Europe programmes, including initiatives funded via the Health Cluster and the Global Health EDCTP3 Joint Undertaking - in line with the EU’s Global Health Strategy. We urge that the scope of this Action

explicitly reference commitments to enhance SRHR through access to vaccines and other health tools (e.g., HPV vaccines, heat-stable carbetocin), as well as the development of life-saving and life-changing sexual and reproductive health tools (e.g., contraceptives for all genders, including male contraception, etc.). Support should also extend to manufacturing and deploying health products developed with EU funding (including through GH EDCTP3 JU) that address priority diseases in sub-Saharan Africa. Key examples include the first two malaria vaccines (RTS,S and R21), as well as upcoming technologies such as the tuberculosis vaccine candidates MTBVAC and M72. It is also important that the research component of the Action will address those diseases that primarily affect the sub-Saharan African region, including poverty-related and neglected diseases, sexual, reproductive and maternal health issues (such as post-partum haemorrhage, fibroids etc.), building synergies with successful initiatives such as the GH EDCTP3 JU. It's also crucial to ensure requirements of the GH EDCTP3 JU of ensuring affordability and accessibility of health tools supported, extends throughout this Action. The Action should continue to build synergies with the TEI on SRHR, with the active involvement of key partners that are already implementing successful actions – including UNFPA and Unitaid, as key implementing partners of the Safe Birth Africa initiative which is considered an excellent example and Global Gateway flagship. These aforementioned initiatives should be further supported via the EU's various research initiatives, including Horizon Europe and the GH EDCTP3 JU (and its future iteration post-2027), in order close the gap in essential women's health, including SRHR technologies, that continue to be missing.

The Commission shares your assessment of the importance of SRHR and is fully aware of the growing backlash in many contexts, including in sub-Saharan Africa. SRHR continue to be a core priority of the EU Global Health Strategy and of the Team Europe Initiative on SRHR, and we are working to further embed SRHR across relevant health actions, including through the planned support to pharmaceutical and health products value chains. The suggestions you make on SRHR-relevant tools, research priorities and affordability/ accessibility safeguards are highly relevant and will be carefully considered during the formulation of the 2026 action and in the preparation of the 2027 Action Plan.

Hope and Homes for Children (HHC) and Transform Alliance Africa (TAA)

Hope and Homes for Children is grateful for the opportunity to contribute to the 8th consultative discussion with CSOs and LAs on EU regional programming for Sub-Saharan Africa, with a Focus on the 2026 AAP. This contribution is developed in collaboration and on behalf of Transform Alliance Africa, a coalition of 20 child rights agencies, based in 12 African countries, and committed to the eradication of child institutionalisation across the continent.

As you may know, in Sub-Saharan Africa, an estimated 650 000 children grow up in institutions, and the wide majority of these children have at least one living parent. This shocking figure is understood to be an underestimate, as there is a critical lack of data in this field. The evidence on the harm of institutions on children is well-documented. Institutions are life-threatening, and the rights of the children residing in them are infringed daily. Abuse, violence and neglect are pervasive occurrences in the institutional

context. Institutions compromise children's development and well-being, exacerbate inequalities, and increase mental and socioeconomic challenges throughout life. It is also notable that even more children deprived of family care are in need of support, including those in street-connected situations. Child institutionalisation is caused by a multitude of factors, including poverty, social exclusion, discrimination and stigma, disability, but also financially motivated interests of unscrupulous stakeholders supporting institutions. Child institutionalisation is always the result of a social protection systems that fail to provide the adequate support to struggling and at-risk families. We believe that one of the key measures of a fair and forward looking international partnership is how it protects its most vulnerable children. The European Union already possesses a comprehensive policy and funding architecture which recognises the primacy of family and community-based care. The European Child Guarantee, the Commission's strategies on the Rights of the Child and on the Rights of Persons with Disabilities, and the programming scope of the Neighbourhood, Development and International Cooperation Instrument establish both a moral imperative and a technical basis for action. These existing commitments oblige us to marshal resources where they will prevent lifelong harm and foster social inclusion. At the same time, there is a growing global momentum to end child institutionalisation. The Global Charter on Children's Care Reform and repeated United Nations resolutions affirm that institutionalisation is neither inevitable nor in the best interests of children. International human rights instruments, notably the Convention on the Rights of the Child and the Convention on the Rights of Persons with Disabilities, oblige States and their partners to prioritise family-based alternatives. The EU must translate these normative commitments into predictable and targeted programming across Sub-Saharan Africa. The risks are urgent. Economic shocks, displacement and shrinking humanitarian budgets increase the likelihood of family separation and the rise of institutions that inflict profound developmental and social harm. Reversals of reform would entrench inequality and destabilise societies.

How can the AAP 2026 advance and promote childcare reform in 2026 in Sub-Saharan Africa?

We note with appreciation the Plan's consistent emphasis on social inclusion, disability consideration and support to vulnerable groups across multiple actions. In particular:

- Human Development (Action 1) commits significant funding to social inclusion, gender and human development, and to strengthening health systems that serve families and marginalised populations.
- Climate Mobility in the Horn of Africa (Action 7) expressly targets forcibly displaced persons and host communities, addressing protection, resilience and livelihoods that directly affect children in displacement settings.
- Peaceful and Resilient Borderlands V (Action 4) integrates socio-economic opportunities for women and youth, and seeks to improve community resilience and natural resource governance relevant to family wellbeing.
- NaturAfrica II (Action 9) promotes green economy opportunities and community livelihoods, with explicit attention to women and youth and to inclusive governance that can benefit families and children.
- GREau Mono (Action 10) commits to including civil society organisations representing women and persons with disabilities, a welcome step towards disability inclusive water governance.
- Support Measures (Action 12) pledges capacity building for regional organisations with a focus on gender equality and disability inclusion, strengthening institutional responses that serve families and children.

However, we must underline that the AAP does not consistently include explicit references to children or to children's rights, nor does it set out dedicated measures for family support, child protection, inclusive education or

disability-sensitive child services. At a time of acute fiscal constraint for international development, and with human development under pressure, it is essential to prioritise targeted investment for the most vulnerable children. In several parts of Sub-Saharan Africa, there are encouraging signs that care systems are shifting from institutional settings towards family and community-based solutions. Rwanda exemplifies this change with its Strategy for National Child Care Reform 2012, which articulates a national ambition for every child living in an institution to regain the right to family life and for Rwanda to become the first institution free country in Africa. That strategy has provided a clear policy direction and a focal point for programming and accountability. South Africa has similarly put family centred reform on the national agenda. A de-institutionalisation policy is already in place and the country convened last month a seminal national care reform summit to consolidate political will and to strengthen the practical commitments needed to sustain change. Kenya has a national care reform strategy that targets total shift from reliance on institutions to family and community-based care by 2032. Beyond individual states, African-led coalitions are amplifying reform: Transform Alliance Africa and the Family First for Children Without Parental Care Alliance (FAFICA) are mobilising research, advocacy and collaboration to affirm that children belong in families. At the continental level, the African Union-mandated Committee of Experts on the Rights and Welfare of the Child has developed a General Comment on Children Without Parental Care and an accompanying Monitoring and Evaluation Framework, which set authoritative standards and provide tools to guide national care reform implementation and accountability. Several interlocking barriers continue to impede care reform and point to where international development actors can best contribute. Poverty and weak social protection programmes lie at the heart of many separations, and sustained investment in cash transfers and livelihoods support is required to keep families intact. Gaps in health, education, nutrition and disability inclusive services undermine family resilience and demand sectoral strengthening and inclusive programming. Child protection systems are often reactive rather than preventive, so support for workforce development, community based early-warning mechanisms and prevention-oriented services is essential. Outdated legal and institutional frameworks can perpetuate institutionalisation, creating a need for technical assistance to reform laws and to embed principles of family preservation. Finally, deficient data systems obscure the scale and nature of children without parental care, including risks such as orphanage trafficking and the exclusion of children with disabilities. Hope and Homes for Children and Transform Alliance Africa call on DG INTPA to dedicate targeted, measurable resources in the 2026 Annual Action Plan for Sub-Saharan Africa to end child institutionalisation and accelerate child-care reform. By prioritising these investments, the EU can translate values into impact, protecting children's rights, preventing lifelong harm, strengthening social cohesion, and reinforcing resilient communities across the region. Bold, strategic financing paired with diplomatic convening will catalyse systemic reform, safeguard vulnerable families from crisis-driven separation, and set a global standard for humane, evidence-based child protection. The moment to act is now: allocate resources that are strategic, accountable and child-centred to turn policy commitments into restored childhoods and brighter futures.

Thank you for your detailed and thoughtful contribution. We would like to clarify the scope and positioning of the AAP 2026 within the broader EU programming framework. Many of the issues you raise, including child protection systems, family support, childcare reform, inclusive education and disability-sensitive child

services, are primarily addressed at national level and, where relevant, global programmes, rather than through regional programming.

The Sub-Saharan Africa Regional Multiannual Indicative Programme is structured around six priority areas where a regional approach provides clear added value: Human Development; Governance, Peace and Security, and Culture; the Green Transition; Digital and Science, Technology and Innovation; Sustainable Growth and Decent Jobs; and Migration and Forced Displacement. Within this framework, regional programming is designed to complement national and global interventions while maintaining a focused scope aligned with these agreed priorities. Child care reform and the eradication of child institutionalisation are not defined as priority areas of the regional MIP. This does not reflect a lack of importance, but rather the need to ensure coherence, focus and complementarity across EU instruments and levels of intervention.

Several of the structural drivers highlighted in your contribution, notably poverty, vulnerability and weak social protection systems, are addressed through other EU actions. In particular, the AAP 2025 on Social Protection Systems Strengthening explicitly supports more inclusive, shock-responsive and equitable systems, which are essential to preventing family separation and supporting at-risk households. In addition, EU health programming continues to take a health-systems-strengthening approach, focusing on access, resilience and equity, with indirect but significant benefits for families and children.

Across all EU programming, including the regional AAP 2026, the European Commission systematically considers people living in vulnerable situations, with particular attention to women, youth and persons with disabilities. To this end, DG INTPA applies the Inequality Marker (I-Marker), launched in 2023, which tracks and benchmarks the extent to which interventions contribute to reducing inequalities. The I-Marker assesses whether inequality reduction is a principal or significant objective of an action and whether it is designed to benefit the poorest 40% of the population and/or disadvantaged groups. This helps ensure that equity and inclusion considerations are embedded across sectors, including in actions that are not explicitly child-focused.

WEMOS

Wemos appreciates the attention and funding dedicated to increased regional production of health products under Mav+. We would furthermore recommend increasing CSO engagement within the Mav+ and Tess program to ensure project objectives align with regional health needs and truly increase affordability and accessibility to health products in the region. Moreover, access and to products affordability for local populations needs to be prioritised in partnership designs, and defined in a measurable way. Product selection should be based on consultations with regional authorities, health experts, community elders and civil society organisations for long term health equity gains. Partnerships should be designed for long term ownership of facilities, technologies and knowledge by the region that can be scaled and adapted as needed. It should not rely on external parties' ownership, licensing limitations and should be clear on long term technology transfer processes. Lastly, it is important the Global Gateway, Mav+ and partnership staff engage with a variety of stakeholder through structured

dialogues that includes local perspectives and representation and NGO/CSO feedback and expertise. Such dialogues can take place in the form of multi-stakeholder roundtables, such as organised by Wemos and ECDPM in 2025 and 2026.

Thank you for your comment and for your engagement on regional manufacturing and access to health products under MAV+. We would like to emphasise that stakeholder engagement is already central to these initiatives. The Commission maintains ongoing dialogues at national, regional and international levels with African institutions, international and European partners, patients' groups, civil society organisations, regional and European manufacturers, research institutions, TVET providers, financing institutions, and regulatory bodies such as EMA.

Access, affordability, and alignment with regional health priorities are core considerations in partnership design. Product selection and investment decisions are informed through consultations with regional authorities, health experts, and stakeholders, with the aim of supporting sustainable, locally owned manufacturing, skills development, and technology transfer.

We welcome your suggestion to further systematise CSO engagement through multi-stakeholder dialogues. The Commission remains committed to inclusive consultations to ensure regional manufacturing initiatives contribute effectively to equitable access, affordability, and long-term health outcomes in Sub-Saharan Africa.

Federation Humana People to People (HPP)

We welcome the planned action on reinforcing pharma, health products and technologies value chains, and its contribution to the MAV+ Team Europe Initiative and Universal Health Coverage.

From a CSO implementer perspective, we see three areas where the action could better leverage community-based health systems and skills development:

- Health workforce and skills: The action rightly mentions “qualified human resources” for biomanufacturing, regulation and R&D, but we encourage stronger links to TVET, universities and community health worker training, especially for women and youth, who remain underrepresented in higher-skill health and science roles.
- Community demand: Local CSOs are often key to building trust in vaccines and locally produced medicines, combating misinformation and ensuring gender-responsive outreach for SRHR and primary health care. We recommend dedicating a portion of funding for CSO-led demand creation, health literacy and community monitoring components linked to MAV+.

Equity and affordability safeguards: In line with SDG 3.8, we encourage the EU to ensure that support to private investment in pharma value chains is tied to clear access and affordability conditions, including for low-income and rural populations.

Thank you for your comment and for highlighting key opportunities to strengthen the impact of the action on pharmaceutical, health products and technology value chains under MAV+.

We fully recognise the importance of linking the development of qualified human resources in biomanufacturing, regulation and R&D with broader health workforce and skills initiatives. Engagement with TVET providers, universities, and community health worker training programmes is an integral part of our approach, with particular attention to promoting the inclusion of women and youth in higher-skill health and science roles.

We also acknowledge the critical role of local CSOs in building trust, addressing misinformation, and supporting gender-responsive outreach for vaccines, SRHR, and primary health care. While the regional MAV+ action focuses on value chain development, community-level demand creation, health literacy, and monitoring are recognised as complementary interventions, and their integration is encouraged through multi-stakeholder dialogues and partnership design.

Finally, equity and affordability are central to the MAV+ approach. Support to private sector investment is guided by principles that aim to ensure access to locally produced health products for low-income and rural populations, in line with SDG 3.8. Long-term sustainability and regional ownership remain key objectives, including through technology transfer, skills development, and inclusive regulatory frameworks.

We appreciate your suggestions and will continue to ensure that MAV+ contributes not only to strengthening health product value chains but also to inclusive, equitable, and locally anchored health outcomes.

PLATFORMA

PLATFORMA strongly believes that building resilient societies in partner countries requires a bottom-up approach through LRGs, strengthening local democracy, gender equality and inter-generational dialogue, connecting civic participation to EU's values- and fundamental-rights-based external agenda.

We call on the EU to make inclusive local governance a priority in regional programming documents, through financing and scaling up participatory mechanisms at local level, supporting capacity-building for LRGs and associations to engage all citizens in decision-making, including the youth and women.

In particular, Africa being the youngest continent in the world, we stress that youth participation and leadership should be integral to local SDG action, with programmes enabling young people to co-design and monitor local sustainability initiatives, ensuring they have a voice and a role in shaping their own future.

The EU provides support to empower youth, connect and engage, in line with the Youth Action Plan for external action 2022-2027, both through consultative mechanisms such as the Youth Sounding Boards at country level and youth led initiatives.

VNG

As Sub-Saharan Africa experiences rapid urbanization, health depends not only on medical infrastructure and dedicated personnel, but also on effective waste management systems and coherent WASH and IWRM policies, in which both local and national authorities play a crucial role.

Without clear mandates and a solid structure for local governance, waste management — despite its economic opportunities — cannot be carried out effectively. This situation jeopardizes the health of the most vulnerable populations, particularly those living in neighborhoods that sometimes serve as dumping grounds for waste coming from wealthier areas.

Thank you very much for your relevant comment regarding WASH and IWRM. Access to safe and clean drinking water and sanitation has been declared a human right by the United Nations General Assembly on July 28, 2010, through Resolution 64/292. WASH is essential for human dignity and public health. IWRM is also essential as it is an upstream element on which many infrastructures depend upon, such as hydroelectric dams, urban water supply, flood, preservation of arable land and biodiversity, etc... As almost 90% of freshwater in Africa are transboundary, eight programs regarding Basin Water Management have been, or are in the process, decided for a total amount of 150 Mo€. These programs have been developed for the watershed of the Tanganika lake, the Senegal river and Senegalo-mauritanian aquifer, the lake Chad, the Cubango-Okavango River, the Mono River, and the Zambezi River.

4. On Democracy, Governance, Peace (including CSO, local government, Illicit financial flows, and maritime security)

AVSI EU Affairs

On the topic of Peace and Security/Initiative V “Peaceful and Resilient Borders.” With regard to the Great Lakes, it is unclear how Initiative V will consider the results and lessons learned from Initiative IV, given that the latter is still in its early stages. This would be essential for a lasting peacebuilding process. The Great Lakes window of Borderlands V covers a different geographical scope than Borderlands IV. The latter is focused on the border areas between Burundi, Rwanda and DRC, while the new phase focuses on selected zones along the DRC-Uganda border, so the two actions are at this stage independent. Borderlands V will mainly draw lessons from and building on the result of FPI initiatives ongoing in the region.

For the Horn of Africa, Malawi, and northern Mozambique, is a new initiative on these issues planned, or will it be linked to certain actions already underway? Which EU Delegation will be responsible?

For the HoA component, activities will capitalise on the results of Borderlands I which is still ongoing until the end of 2026 (EUD Kenya responsible of the current and new phase) On the contrary, this is the first time the Borderlands concept has been applied to border areas in Southern Africa. This component, covering Malawi-Mozambique is managed by EUD Malawi.

Save the Children

Observations concerning two specific actions:

Action 2: EU for Democracy, Governance and Accountability (EU 4 DGA) in Africa – Planned amount EUR 40 M

Specific Objective 2: Since voter education is essential for building informed, rights-aware, and engaged citizens, we suggest including at least one budgeted action aimed at strengthening the capacities of adolescents and young people—especially girls and marginalized youth—to engage meaningfully in these spaces, as well as to support youth-led monitoring, consultations, and social accountability around elections and civic education.

Thanks for these suggestions which can be addressed as part of the current action and which will also be brought to the attention of the relevant colleagues at contract level for the formulation and implementation phases. In fact, inclusive civic and voter education and civil society participation and oversight of elections is indeed foreseen as part of the tailor made comprehensive electoral support packages in a limited number of SSA countries that the EUDs will be able to devise. Activities such as civic and voter education will be designed to ensure wide accessibility, including in remote and disadvantaged areas, while promoting participation and oversight by women, youth, and other under-represented groups. The action emphasizes the importance of a pluralist and independent civil society in enhancing the participation of women, youth, persons with disabilities, minorities, and marginalized groups in line with country roadmaps for the engagement of civil society. Furthermore, the action aims to strengthen capacity of CSO networks in electoral related issues in Africa to engage in multi-stakeholder advocacy coalitions on democracy support at national, regional and continental levels.

Finally, the current draft formulation of the tentative (and non-exhaustive) list of activities also includes technical assistance (TA) to Electoral Management Bodies and State institutions on inclusivity and gender equality initiatives and mainstreaming targeting vulnerable groups and youth; but also demand-driven TA to PAPS, RECs, and regional EMBs, focusing on gender, youth, and digitalization.

Action 4: Peaceful and resilient borderlands V – Planned amount EUR 78 M (West Africa cluster):

Specific Objective 1: It could be of added value to include a preventive layer that reduces the risk of future recruitment into violent groups and normalisation of violence, especially in border and conflict-affected areas. A foundation for the youth-focused conflict prevention work, by ensuring that when children grow into “youth” they already have the socio-emotional skills and values that those programmes need to build on. Concretely, this could mean integrating peace and nonviolence content into early grades (through stories, games, classroom rules, teacher training) and linking it to community activities so parents and local leaders reinforce the same messages.

Specific Objective 2: A conflict prevention package in border areas that deliberately links: peace / civic education (for children and youth), youth and women’s economic resilience (skills, entrepreneurship, climate-smart livelihoods, support to mobility compatible services), and community level social cohesion and dialogue platforms (including pastoralist representation). Explicit attention to pastoralist children and adolescents as a priority group, to avoid them being invisible in both education and economic components

Thank you for these suggestions that will be passed on to the EU Delegation in charge of the contract and considered during the delineation of the concrete activities.

VNG

VNG International strengthens the capacity of local governments to take the lead in improving security, building trust in local security institutions, and creating communities where citizens genuinely feel protected.

Local territories are where these dynamics are most visible. Citizens often call for immediate and tangible measures, such as increased police presence or enhanced surveillance. However, sustainable security requires addressing deeper, structural causes: a weak judicial system that fosters impunity, social exclusion, socio-economic inequalities, lack of services, fragile social cohesion, and other local drivers of conflict such as drug use, petty crime, domestic or land disputes, and economic insecurity — all of which can also fuel recruitment into armed groups.

Strengthening governance at the provincial and territorial levels brings decision-making closer to citizens and allows security programs to more effectively address these local drivers of conflict. In contrast, centralized, top-down approaches often fail to capture or respond to local realities.

Over the past decades, mayors and local governments have become key actors in the security landscape and in policy-making processes. In many contexts, they are the competent authority for the police, chair the triangular approach (coordination meetings between mayor, police, and prosecutor), and initiate or implement the preventive aspects of security policy. They therefore play a central role in coordinating local security governance.

It appears that many countries tend to lose control of territories distant from their political or economic capitals. Relying on local security governance is thus a key lever to mitigate this risk: it enables a closer institutional presence, a better understanding of local dynamics, and a faster response to threats. In this context, security management at the level of border territorial authorities becomes particularly strategic. Such an approach not only strengthens local security but also contributes to local economic development (LED) by creating a more stable environment conducive to trade, investment, and cross-border cooperation.

Thanks for your suggestions. In our borderlands programmes we are cognisant of the importance of local authorities and they are full stakeholders in the activities.

International Federation of ACAT (FIACAT)

La question des visas pour les défenseur·ses des droits humains doit constituer une priorité dans chaque programme, compte tenu du rétrécissement de l'espace civique. En 2024, l'UE a adopté une version actualisée du Visa Code Handbook, qui prévoit notamment la délivrance de visas à entrées multiples afin de faciliter la participation des organisations de la société civile aux activités de plaidoyer ainsi qu'aux rencontres prévues par les mécanismes régionaux et internationaux de protection et de promotion des droits humains. En pratique, cette disposition n'est toutefois pas mise en œuvre. Nous constatons au

contraire une augmentation des refus de visas émis par les consulats et ambassades des Etats membres en Afrique subsaharienne, souvent fondés sur des motifs génériques ou inexacts. À cela s'ajoutent les restrictions budgétaires de nombreuses institutions, qui ont mis fin au format hybride des réunions, rendant ces espaces — où le rôle de la société civile est pourtant indispensable — de moins en moins accessibles pour les acteurs locaux. Nous recommandons donc une mise en œuvre effective et cohérente de ces dispositions, afin de garantir que les instances de protection et de promotion des droits humains demeurent des espaces légitimes et crédibles. La FIACAT insiste pour le renforcement de capacités des acteurs locaux en matière de lutte contre la torture, pour le respect des garanties judiciaires, et l'abolition de la peine de mort. La protection des droits humains et la lutte contre les inégalités sociales doivent rester un enjeu prioritaire pour garantir l'Etat de droit et faire face à la montée des extrémismes. En co-construisant avec les autorités nationales à travers le soutien aux programmes des OSC locales, l'UE peut renforcer à la fois la légitimité des partenaires locaux, et permettre une meilleure appropriation par les bénéficiaires des enjeux de promotion et de protection des droits humains.

The Commission would like to recall that each Schengen Area Member State is responsible for the issuance of visas and the handling of visa applications. However, they must do so within the framework established by EU regulations, particularly the EU Visa Code (Regulation (EC) No 810/2009) and its respective EU Visa Code Handbook. In this context, individual Member States apply these rules in their consulates and embassies worldwide.

In the context of visa applications, HRDs are usually identified by consulates after consultation of central authorities who themselves use different criteria for their national schemes, including using information from "trusted third parties". This could be used also in the context of the application of the Visa Code and makes the identification of these people easier by consulates.

We are aware of the challenges in accessing diplomatic representations, whose presence in each third country depends however on each individual Member State. Our network of EU Delegations can provide general assistance to human rights defenders and redirect them towards the closest or the relevant diplomatic representation, according to their needs.

We are cognizant that access to visa is an issue also beyond HRDs and for CSOs at large. On civil society co-creation and reinforcement, an aim of the EU country Roadmaps for civil society— for which a fourth generation has just been launched – is precisely to reinforce and legitimise civil society in its role as a governance actor, participating in policy dialogue and formulation on sectors of interest to the EU and the government.

We continue to support CSOs through a dedicated civil society thematic programme, worth 1.5 billion euro under the current MFF and which has a focus on capacity building for CSOs at national and local levels. In addition, in both our human rights and democracy and civil society thematic programmes we are working with civil society at the global level through a strong sub-granting element via FSTP (financial support to third parties) to enable local CSOs to access and benefit from more flexible support. This is a modality of support also open to geographic programmes, whether at continental, regional or national level, which are mainly managed by the EUDs. Furthermore, in a context of shrinking civic space the EU is investing in support for an enabling environment for civil society through a range of initiatives, as well as a dedicated

50 million euro global civil society-led programme, the EU System for an Enabling Environment for civil society (EU SEE).

5. On Migration and forced displacement

Federation Humana People to People (HPP)

We welcome the Climate Mobility in the Horn of Africa action, which recognises the links between climate change, environmental degradation and displacement, and promotes area-based, conflict-sensitive approaches.

Based on our work with refugees, IDPs and host communities in education, livelihoods and WASH, we recommend to:

- Ensure that education in emergencies, youth skills and livelihood support are explicitly integrated. Right now, the emphasis on DRM and natural resource management is strong, but learning continuity and skills for displaced youth are not clearly highlighted.
- Expand the climate mobility approach beyond the Horn over time, drawing lessons for other displacement-affected regions such as Cabo Delgado or the Great Lakes, where we and other CSOs already implement education, TVET and resilience programmes.
- In line with previous CSO recommendations, ensure a nexus-based approach that links humanitarian assistance, development and peacebuilding, with CSOs and local authorities as co-designers rather than only implementers.

Thank you for your comments. See also responses in other sections, which overlap with the issues raised.

PLATFORMA

LRGs are at the forefront of climate action, managing approximately 68% of public investments related to climate and energy. OECD underlines that, “relative to central governments, subnational governments are responsible for the majority of environmental and climate-related spending and investment”^[1].

Their unique positioning allows them to efficiently respond to local needs, implement innovative climate strategies, and foster community resilience to climate change impacts, such as storms and floods, erosion, droughts, wildfires, rising sea levels, decline of organic matter, biodiversity loss, landslides, heat waves, or desertification.

We call for appropriate capacity building, cooperation, resources and support to LRGs, empowering them in SDG implementation and ensuring that sustainable development policies are in line with the realities on the ground.

Thank you very much for your inputs. They have been shared with the colleagues working on the relevant programmes; the comments are relevant for the preparation of the contracts.

^[1] OECD (2019), “*Financing climate objectives in cities and regions to deliver sustainable and inclusive growth*”, OECD Environment policy paper No. 17

VNG

At VNG International, we approach migration through a comprehensive, integrated, and sustainable lens. Our work focuses on supporting local governments by strengthening their capacities to manage the challenges and opportunities linked to migration and the influx of refugees. As the first point of contact for newcomers, local governments play a crucial role in ensuring that migration contributes to inclusive, safe, and resilient communities.

Migration places increasing pressure on host communities, both in terms of providing basic services to a growing population and fostering coexistence and social cohesion. Municipalities often face challenges in addressing these impacts and require support to act effectively within their mandates and responsibilities.

VNG International assists local governments hosting refugees to understand how their presence affects urban planning, service provision, and social cohesion. Local governments are key actors in creating conditions that enable people to thrive and move out of vulnerability. Vulnerability knows no nationality, and municipalities are at the forefront of ensuring access to basic services, personal development opportunities, and pathways to entrepreneurship.

Municipalities adopt an integrated approach: they plan for and serve their entire community while acting as essential connectors—building partnerships with other levels of government, private actors, and international donors. In this way, local governments are indispensable for strengthening social cohesion and fostering sustained public support for the presence of refugees.

The Commission would like to thank VNG International for their work supporting local governments hosting refugees and migrants. The EU approach in this area is aligned with the Communication on a New Pact on Migration and Asylum, the strengthened partnership with Africa and the Communication ‘Lives in Dignity’. EU regional actions on urban displacement and/or mobility – such as our AAP2023 SUIDAC program or our AAP2025 urban response in the Sahel - contribute to the indicative 10 % spending target foreseen in the NDICI-Global Europe. These actions support the Compacts’ arrangements benefitting refugees and their host communities in urban areas while aiming to ease pressures on countries and their respective DACs-hosting cities, to enhance the sustainable integration opportunities for refugee and hosts, to support DACs’ paths to self-reliance and to expand displaced peoples’ access to third-country solutions whenever possible.

6. On Green transition (including climate change, agri-food, pastoralism, and ocean protection)

AVSI EU Affairs

How does the NaturAfrica regional program fit into the major infrastructure projects and programs of Global Gateway or Green Corridors? It is unclear how they are managed and who is responsible for overseeing the synergies between Global Gateway and the regional program, whether it is EU delegations

or Brussels. Since Global Gateway does not provide direct grants to civil society, how is support for local communities envisaged?

NaturAfrica is a Global Gateway Flagship. Synergies are sought at landscape level with both hard infrastructure and national and regional programmes. Delegations and HQ work together with the Delegations who manage the NaturAfrica contracts as well as the blending contracts. In the case of NaturAfrica, the grant modality is widely used.

Federation Humana People to People (HPP)

Actions under NaturAfrica II and PPR2 are well placed to integrate agroecological practices, farmer-led innovation and climate-smart agriculture, which CSO networks like ours already implement at scale.

We encourage:

- Explicit references to agroecology and food sovereignty approaches, including participatory research and extension involving smallholder farmers, women and youth.
- Dedicated funding for CSO-led green skills training at community and TVET levels – for example on regenerative agriculture, rangeland management, watershed protection, sustainable fisheries and nature-based tourism.

We confirm that when working on livelihoods and green economy we support agroecology, skills and knowledge and work with small holder farmers.

VNG

Climate resilience in the face of potential disasters relies on preventive risk assessments, the establishment of early warning systems and local response units, the adoption of adaptive methods — including nature-based solutions — and the construction of resilient infrastructure. Engaging communities through awareness-raising and capacity-building ensures their active participation in risk reduction. Post-disaster reconstruction aims to rebuild stronger and more sustainable local structures, while integrating lessons learned to enhance future resilience. Climate-resilient development involves integrating strategies for climate adaptation and mitigation into national and local sustainable development plans. Aligning these efforts with the Sustainable Development Goals (SDGs) strengthens disaster resilience while contributing to broader objectives, such as poverty reduction and environmental sustainability. Local governments play a crucial role in climate-resilient development and disaster risk management. By adapting national policies to their specific geographic and social contexts, they develop and implement practical emergency evacuation plans, conduct urban and spatial planning, and are often responsible — at least in part — for water and waste management. They assess regional risks and design management plans tailored to the unique vulnerabilities of their territories. By managing infrastructure and land use, local governments ensure that local development aligns with climate realities. They engage and mobilize communities, empowering them to reduce risks according to their specific circumstances. During crises, local governments lead emergency responses and coordinate recovery efforts designed to enhance long-term resilience, while continuously adapting national policies to the concrete needs of their populations.

We confirm that local governments will be involved in the implementation of the climate mobility programme in the horn of Africa.

WWF

Action 7: Climate Mobility in the Horn of Africa – Planned amount EUR 36 M To further boost the relevance, impact and coherence of this action, we recommend the following: 1. Strengthen evidence generation to inform targeted adaptation and DRR responses: Action 7 would benefit from a stronger emphasis on generating conflict-sensitive, gender-inclusive and locally grounded evidence on climate-related vulnerabilities and risks, particularly for displacement-affected communities. Building a comprehensive evidence base will ensure that adaptation and disaster-riskreduction (DRR) interventions are context-specific, effective, and responsive to the needs of the most exposed populations. 2. Promote integrated knowledge systems for early warning and prevention: Early warning and prevention systems should be established by combining indigenous knowledge with scientific knowledge/approaches. This ensures that early warning systems are relevant at the community level and inform appropriate responses 3. Operationalise gender, equity, and inclusion (GESI) commitments: The Regional MIP prioritizes inclusive and participatory governance, yet Action 7 could bring more clarity on how gender, youth, and disability inclusion will be operationalized in climate-mobility interventions. Ensuring these groups have meaningful roles in planning, land-use decisions, and resilience-building would strengthen equity outcomes and align with the MIP’s social inclusion commitments. Capacity-building activities under SO1 and SO2 should explicitly integrate GESI principles. 4. Ensure cross-country coherence & harmonization: With seven countries involved, we need to develop harmonized frameworks, ensuring risk management, mobility governance, and resilience-building approaches are aligned across countries to ease data management. For instance, the action plans to improve disaster risk management and climate early-warning systems, but it would be good to clarify how countries will harmonize their data and alerts. 5. Enhance policy coherence with national adaptation frameworks: The action should articulate how it will support the revision and implementation of National Adaptation Plans (NAPs), Nationally Determined Contributions (NDCs), and related climate and DRR strategies. Embedding climate mobility considerations within these national frameworks will reinforce long-term policy coherence and ensure sustained implementation 6. Integrate nature-based solutions (NbS) and ecosystem-based adaptation (EbA): The action should incorporate capacity building for communities on NbS and ecosystem-based adaptation (EbA). Such approaches help communities adapt through the sustainable use of biodiversity and ecosystem services, while providing significant co-benefits for both people and nature. 7. Strengthen locally led adaptation approaches: Capacity-strengthening efforts should also empower communities to design, implement, and sustain locally led adaptation approaches, ensuring solutions are rooted in local knowledge, priorities, and decision-making. 8. Ensure accessible and flexible funding modalities for civil society organisations (CSOs): To maximise local impact and ensure that interventions are rooted in community needs, Action 7 should include clear and accessible funding modalities that enable CSOs—particularly local and national organisations—to implement components of the programme directly. Providing dedicated grant mechanisms, simplifying administrative requirements where possible, and ensuring timely access to resources would strengthen locally led adaptation, improve accountability, and align with wider commitments under the Global Europe Instrument to reinforce civil society participation. Enabling CSOs

to play a direct implementation role is essential for ensuring inclusive, community-driven climate mobility responses and for sustaining long-term resilience in the region. **Action 9: NaturAfrica II – Planned Amount EUR 155 M + EUR 5 M of transfer agreement from DK SO1:** We welcome the strengthened focus on human rights, the rights of Indigenous Peoples, and meaningful community engagement within NaturAfrica II, as well as the emphasis on integrating human rights into conservation practice. Embedding these principles in the programme architecture is essential to ensure that conservation outcomes go hand-in-hand with social justice, equitable access to natural resources, and the protection of environmental human rights defenders. WWF recognises that positive outcomes for people and nature are intrinsically linked, and we are committed to promoting the rights of Indigenous Peoples and local communities as a core part of our approach¹. The action's reference to OECMs (Other Effective Area-Based Conservation Measures) is welcome; however, OECMs remain unevenly recognised across Africa, with only a small number of countries formally identifying such areas to date². It will be important to ensure flexibility so that other nationally relevant biodiversity-rich areas—such as Key Biodiversity Areas (KBAs), community-conserved areas, or other locally designated conservation zones—can be included where OECMs are not yet established. Improving the ecological connectivity across high biodiversity landscapes will require participatory landuse planning and stakeholder engagement as. Depending on the areas identified, connectivity measures may intersect with competing land-use priorities and could generate tensions if not well managed. The involvement of stakeholders in this process is key, in particular Indigenous People and Local Community ¹ https://wwf.panda.org/discover/people_and_conservation/ ² <https://www.protectedplanet.net/en/monthly-release-news/november-2025-update-of-the-wdpc-and-gdpame-groups>, so initial stakeholders mapping and engagement efforts are a prerequisite. Embedding strong, inclusive governance mechanisms will help prevent resource-related conflicts, safeguard rights, and ensure equitable benefit-sharing, thereby improving the long-term legitimacy and sustainability of NaturAfrica II interventions. SO2: To deepen livelihood impacts, increase community resilience, and ensure long-term economic viability within KLCD landscapes, we propose the following recommendations: 1. Strengthen Nature-Positive Fisheries and Aquatic Food Systems - Particularly relevant for KLCDs with rivers, lakes, wetlands, and floodplains. Aquatic foods provide nutrition and livelihoods for many communities, yet they are often underrepresented in landscape-level planning. Integrating fisheries increases food system resilience and expands nature-positive value chains. Suggested interventions include: i) Establish and strengthen co-management systems for inland fisheries and designated community fishing zones. This intervention will not only create jobs and improve nutrition but also will safeguard the natural wetlands and breeding habitats for birds, fish, and other wildlife; ii) support ecosystem-based, low-impact aquaculture models using native species; iii) promote productive use of solar energy (PUSE) such as solar-powered cold storage, improved processing, and hygienic fishdrying technologies to reduce losses and increase income. 2. Support circular economy and waste-to-value enterprises: Circular economy solutions reduce environmental pressures, increase MSME income, improve resource efficiency, and help address gaps not fully emphasized under the current EU NAF II SO2 focus. Examples of potential interventions: 1. promote organic waste biodegradation to produce biofertilizers and black soldier fly (BSF) feed for poultry and aquaculture. This will contribute to reduce emissions from food and organic wastes. 2. Support biogas generation from livestock manure to reduce methane emissions; 3. facilitate upcycling enterprises (fruit peels, fish waste, timber off cuts) for local

value creation; 4. strengthen localized plastic waste reduction and recycling micro-enterprises around protected areas and key markets. 3. Strengthen food system transformation across KLCDs: While SO2 includes important conservation livelihoods linkages, it could go further in adopting integrated food systems approaches that drive sustainability and resilience: - Promotion of sustainable diets and demand-side behaviour change. - Reduction of food loss in horticulture, fisheries, and other key value chains. - Adoption of circular bioeconomy solutions, including composting and waste-to-energy applications. - Application of water–food–energy nexus tools to optimize resource use. 4. Building capacity of enterprises in the Green Economy Unlocking the green economy in KLCDs requires a strategic approach that enhances the scalability and bankability of conservation-aligned economic opportunities, enabling NaturAfrica II to contribute meaningfully to broader EU priorities on leveraging private capital to achieve SDGs, including by complementing Global Gateway investments with nature-positive financing pipelines. Globally, nature represents a massive investment opportunity: transitioning to a nature-positive economy could generate US\$10 trillion in annual business opportunities and create 395 million jobs by 2030. The finance sector is a powerful lever for driving this transition. Investing in enterprises that sustain vital ecosystem services—such as clean air and water, food production, and a stable climate—will accelerate the shift to an equitable, net-zero, nature-positive global economy. Developing green financial solutions and blended finance instruments can help reallocate capital to companies and community enterprises that deliver sustainable practices, benefit people and local economies, and contribute to the conservation, restoration, and sustainable use of biodiversity. By strengthening enabling conditions and supporting innovative, replicable and scalable financing models, NaturAfrica II can play a catalytic role in mobilising public and private finance for nature-positive development across the region. To translate the significant global investment potential of nature into tangible opportunities for communities in Sub-Saharan Africa, NaturAfrica II must directly address the structural barriers that inhibit the growth of nature-positive enterprises in KLCDs. While the programme’s ambition to foster green economic development is welcome, the conditions in many SSA countries—marked by limited access to finance, high risk environments, and persistent governance and market constraints—require a deliberate and wellsequenced approach. To effectively activate the green economy under Action 9 and ensure that investments contribute to conservation priorities, livelihoods, and climate resilience, NaturAfrica II should deploy its resources in ways that catalyse private finance through blended finance instruments and strengthen the enabling conditions where barriers are most acute. Nature-dependent livelihoods face a set of systemic challenges that continue to limit the scalability and bankability of conservation-aligned economic opportunities. Key constraints include: - A limited pipeline of investment-ready projects, largely due to inadequate project preparation capacity. - Fragmented and small-scale initiatives, with insufficient support to aggregate or structure them in ways that are attractive for private finance. - High cost of capital, particularly in local currencies, which significantly reduces the commercial viability of green-economy investments. - High perceived and actual risks, compounded by limited access to risk-sharing instruments and insufficient data to appropriately assess and price risk. - Under-deployment of blended finance and guarantee instruments, which are crucial for enabling privatesector participation and crowding in investment. - Restricted market access and weak off-take arrangements, which undermine the long-term viability of green business models. - Governance and regulatory gaps, including limited law enforcement, which weaken confidence and hinder sustainable investment. - Uncertain or challenging enabling conditions, including inconsistent

policy frameworks and regulatory instability. Given these challenges, it is critical that the Action Document articulates and supports a systematic approach to mobilise and align finance within a holistic landscape model - one that is long-term, integrated and collaborative and that combines environmental, social, and economic outcomes, improving viability and reducing risk. A robust and practical methodology for mobilising both public and private sector participation will enable smooth engagement with a diverse stakeholder group including SMEs (including youth and women-led), cooperatives, aggregators, value-chain off-takers and local financial institutions. Such a methodology must enable the translation of conservation priorities into investable opportunities that also align with national development objectives. NaturAfrica should also support enabling conditions by investing in governance, policy coherence, safeguard systems, and transparency mechanisms that are prerequisites for crowding in investment. Strengthening this strategic foundation will enhance the ability of NaturAfrica II to deliver transformative, scalable, and sustainable green growth impact across KLDCs. In November 2025, WWF and partners launched an innovative Landscape Finance Approach toolkit designed to transform nature into a low-risk, high-return investment opportunity. The package—comprising an Investor White Paper, a Landscape Finance Guide, a Practitioner Playbook, and case-study deep dives—offers practical methodologies to build investment-ready nature-positive projects and can support NaturAfrica II in shaping scalable, financeable opportunities across KLDCs³.

Thank you very much for the extensive inputs. They have been shared with the colleagues working on the two programmes for their consideration.

7. On Sustainable growth and decent jobs, Digital, STI (including trade, responsible business conduct and product safety)

AVSI EU Affairs

This priority sees critical raw materials as the key sector for the future. In this context, it would be useful to explain in more detail what actions the European Union intends to take to ensure that local communities can actively participate in the design and planning of activities supporting this value chain (TVET, training for highly specialized personnel, etc.).

With support from INTPA G colleagues, we made substantial modifications to our final version of the AD on CRM by adopting a stronger vision for human rights. This goes beyond minimum ESG standards and takes a more enabling approach.

We also focused on more active integration of the role of CSOs. For example, we aim to support local civil society in its monitoring role of ESG standards, transparency, and accountability, including participation in EITI multi-stakeholder groups.

Regarding women and children, we incorporated support for networks of miners, particularly addressing women and child labour, to advocate for their rights (see also questions below).

Save the Children

Observations concerning one specific action:

Action 11: Regional Support to the CRM Sector: building an enabling environment in Sub-Saharan Africa
– Planned amount EUR 41 M

The CRM action should adopt a stronger vision for human rights (beyond minimum ESG standards, and rather in an enabling manner) in a sector that is developing fast and with significant risks. The action should clearly articulate an unequivocal commitment to human rights due diligence (or any other better instrument for accountability), including specifically the rights of children, and safeguard mechanisms. Specific objective 3 ('enhancing rights') is welcome but should not be limited to labour rights (including critically social protection), but also rights to participation and related civil rights. It should explicitly articulate support to local communities (and in particular children, women, youth or generally seldom-heard groups) for meaningful equal and protected participation (and not just representation) in decision-making, and not just the governments and private sector, when it comes to critical minerals investments, with due reference to conflict sensitivity.

Civil society should be included as an equal partner, not just consulted, to support a better balance of power in decision-making around such investments and operations. There should be explicit reference to, and inclusion of human rights (women's rights, child rights and environmental rights defenders), through dedicated support and protection mechanisms. Specific objective 4 ('development of skills') should adopt a strong gender transformative approach, and go hand-in-hand with early childhood education and care, child-sensitive social protection, and value chain-related gender-responsive education/training support. It would also be a great opportunity to include climate smart education components for children, to grow aspirations for climate actions into know-how for the next generations (considering many children will turn young adults during the course of most of those investments).

Overall, the importance given to value chain approaches throughout the various priorities should go hand-in-hand with due attention and support to transformative components for an enabling environment, in terms of child-sensitive social protection, early childhood education and care, women's economic empowerment, as minimum investment standards.

Please see reply above.

Federation Humana People to People (HPP)

The planned Action on "Regional Support to the Critical Raw Materials (CRM) sector: building an enabling environment in Sub-Saharan Africa" is strategically important in the Global Gateway context. From a community and skills perspective, we support efforts to improve the enabling environment, but it is essential that CRM investments translate into decent, green jobs and tangible local benefits, particularly for young people living in rural and marginalised mining regions, where the majority of the population resides. Ensuring that rural youth are not left behind must be a core principle of the Action.

We recommend that:

- The Action systematically integrates skills development, including inclusive TVET and community-based training pathways, to enable local youth—especially those in rural and remote areas—to access emerging

opportunities in green and just CRM value chains. Partnerships with African TVET providers, teacher-training institutions and CSOs can ensure locally rooted, practical and scalable delivery.

- Strong responsible business conduct and human-rights safeguards accompany all CRM-related investments, with independent monitoring that meaningfully involves local CSOs, communities, and youth groups, in line with the EU's commitment to a just transition and to leaving no one behind.

Please see reply above.

VNG

Local governments have enormous potential to support businesses and entrepreneurs, stimulate an enabling environment for Local Economic Development (LED), and create meaningful job opportunities. They are typically responsible for providing essential services, territorial planning, social protection policies, and security, but they also play an important role as catalysts for community-driven economic growth and employment. By identifying local opportunities, supporting entrepreneurship, and creating a business-friendly environment, local governments can unlock the full potential of their communities. Agriculture is an important employment sector in Sub-Saharan Africa, but without effective land governance programs, numerous land conflicts arise. Insecure land tenure and unclear usage rights hinder sustainable economic development and can negatively affect the business climate. Land governance programs, complementing cadastral systems, are therefore essential. They enable both national and local authorities to maximize the productivity of their territories and support decent employment.

We agree. Both pastoralism programmes in West Africa and the Horn of Africa (AAP 2022–2023) include components focusing on land tenure.