

## Recommendations on the NDICI migration spending target

The European Commission's proposal for the Neighbourhood, Development and International Cooperation Instrument (NDICI) is currently the only instrument dedicated to the implementation of EU development cooperation policy, which aims at reducing – and in the long-term eradicating – poverty, tackling inequalities, discrimination and realising the 2030 Agenda and its SDGs. It addresses migration through introducing a spending target of 10% of the NDICI to be dedicated to “addressing the root causes of irregular migration and forced displacement and to supporting migration management and governance including the protection of refugees and migrants' rights.”

CONCORD would like to raise the following concerns and recommendations regarding the proposed migration spending target:

- The volume of the migration spending target - 10% of the NDICI, is excessive, and does not have any basis in the Treaties. Therefore the spending target should be eliminated or the percentage decreased, or at least, *in line with the European Parliament's NDICI report, set 10% as a maximum and ensure a balanced development approach to migration throughout the text.*
- Working on the root causes of migration goes beyond migration management and covers a wide array of policy fields which requires its implementation to be in line with the principle of policy coherence for sustainable development. The NDICI should also be implemented in coherence with other funding instruments that relate to internal aspects of migration. Also *any EU migration-related actions supported by the NDICI should be human rights-compliant, as well as be age and gender sensitive.*
- When implementing the NDICI, the EU should ensure respect for development effectiveness principles. As such, the *NDICI should be allocated with no conditionality (positive or negative incentives) requiring partner countries to cooperate in migration management, including return schemes.*
- The allocation of NDICI resources must be based on an analysis of the country's needs, and not be exclusively politically driven. Furthermore, there should be no diversion of finance from poor countries and regions to countries of origin or transit, on the sole basis that they are on the migratory route. *Thus any decision to fund actions related to external migration (management) should be based on an ex-ante impact assessment and done in consultation with civil society, in line with a do no harm approach.*

<b>NATIONAL PLATFORMS</b>	Global Responsibility	BELGISCH PLATFORM PLATE-FORME BELGE <b>CONCORD</b> CNCD-11.11.11 11.11.11 AGOCOV Hrvatska Federacija	<b>BPID</b> Bulgarian Platform for International Development	Platforma za međunarodnu građansku solidarnost Hrvatske Croatian Platform for International Citizen Solidarity <b>CROSOL</b>	<b>CYINDEP</b> Cyprus Island wide NGO Development Platform	<b>FORS</b>
<b>GLOBAL FOCUS</b> Danish CSOs for Development Cooperation	<b>AKÜ</b>	<b>fingo</b>	<b>COORDINATION SUD</b>	<b>VENRO</b> ASSOCIATION OF GERMAN DEVELOPMENT AND HUMANITARIAN AID NGOS	Hellenic Platform for Development	<b>HAND</b>
<b>Dochas</b> The Irish Association of Non-Governmental Development Organisations	Network delle ONG in Europa per lo sviluppo e l'emergenza <b>CONCORD ITALIA</b>	<b>LAPAS</b> WWW.LAPAS.LV	Lithuanian National Non-Governmental Development Cooperation Organisations' Platform <b>LITDEA</b>	<b>Cercle de coopération</b> des ONGD DU LUXEMBOURG	<b>SKOP</b> Solidarjeta u Koperazjoni	<b>PAR TOS</b>
<b>ZAGRANICA</b>	<b>ONGD</b> PLATAFORMA PORTUGUESA	<b>FOND</b> Federacija Organizacija za Negovarenje partnerstva, Desetina za Ruzdica	<b>MVRO</b> Platforma mimovládnych dobrovoľných organizácií Slováck NGDO Platform	<b>SLOGA</b> SLOVENIAN GLOBAL ACTION	<b>COORDINADORA</b> DE COOPERACIONES DE COOPERACION PARA EL DESARROLLO ESPAÑA	<b>C&amp;NCORD</b> SWEDEN
<b>bond</b>	<b>NETWORKS</b>	<b>actalliance eu</b> formerly APODEV	<b>act:onaid</b>	<b>ADRA</b>	<b>care</b>	<b>caritas europa</b>
<b>cbm</b> together we can do more	<b>ChildFund Alliance</b>	<b>CIDSE</b> together for global justice	<b>euCORD</b> European Charitable Organisations for Relief and Development	<b>GNDR</b> Global Network of Civil Society Organisations for Disaster Reduction	<b>Habitat for Humanity</b> Europe, Middle East and Africa	<b>humanity &amp; inclusion</b>
<b>IPPF</b> International Planned Parenthood Federation European Network	<b>ISLAMIC RELIEF</b>	<b>LIGHT FOR THE WORLD</b>	<b>OXFAM International</b>	<b>PLAN INTERNATIONAL</b>	<b>Save the Children</b>	<b>Sightsavers</b>
<b>solidar</b>	<b>SOS CHILDREN'S VILLAGES INTERNATIONAL</b>	<b>Terre des Hommes International Federation</b>	<b>wecf</b>	<b>World Vision</b>	<b>WWF</b>	<b>ASSOCIATE MEMBERS</b>
<b>ALDA</b> European Association for Local Democracy	<b>ea ea</b> EUROPEAN ASSOCIATION FOR THE EDUCATION OF ADULTS	<b>EUROPEAN PARTNERSHIP FOR DEMOCRACY</b>	<b>NRC</b> NORWEGIAN REFUGEE COUNCIL			