Dear Ambassador to the Political and Security Committee,

Re: The proposed ‘European Peace Facility’

I am writing to you on behalf of the European Peacebuilding Liaison Office (EPLO) with regard to the proposal for the establishment of the ‘European Peace Facility’ (EPF).

EPLO is a platform of 37 European non-governmental organisations (NGOs), NGO networks and think tanks working globally to prevent violent conflict and to build peace. We have concerns and questions about the proposed EPF, including but not limited to the military ‘Train & Equip’ component and the possibility of it being used to fund the provision of weapons and ammunition, and the payment of soldiers’ salaries.

We believe that the EU has a huge potential to distinguish itself as a global peace actor. However, while the name of the proposed EPF implies that it will contribute to ‘peace’, we have two pressing questions: How will it contribute to increasing human security\(^1\) in conflict-affected countries and regions? What would be the added value of providing lethal equipment to partner countries’ militaries?

Several components of the proposed EPF are untested areas for the EU and the proposal fails to mitigate adequately the serious risks involved in their implementation. While we continue to question the necessity of the EPF, if it is to be established, the following aspects must be addressed:

1) **Rigorous conflict analysis and risk and impact assessments**, which fully integrate gender analysis and comply with human rights obligations, should be carried out before EPF support is provided. There should also be careful monitoring and evaluation of the impact of this support (e.g. to assess how the perceptions and experiences of security of diverse men, women, boys and girls may have changed). A procedure must be put in place to stop this support at any point if it is found to be used for torture, mistreatment or other human rights violations and harmful practices or if it is contributing to worsening conflict dynamics.

2) **Exhaustive accountability measures and mechanisms** should be integrated into the Decision establishing the EPF. Continuous transparency on the type of support provided (e.g. what equipment, for whom, etc.) will be essential to enable oversight and accountability towards both the local populations in the recipient countries and EU citizens. In this regard, the role of parliaments and civil society (both in Europe and in the recipient countries) should be taken into account in the proposal. In addition, EPF support should be conditional, *inter alia*, on reforms related to civilian oversight of military forces in partner countries, human rights, anti-corruption and public financial management, as well as on the establishment of independent citizen grievance mechanisms to monitor and address the potential misuse of military force capabilities.\(^2\)

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\(^1\) Human security is people-centred, focusing attention on the security of the individual and society at large rather than just state security, which focuses on the territorial integrity of the state. According to the Human Security Initiative, ‘human security focuses primarily on protecting people while promoting peace and assuring sustainable continuous development. It emphasises aiding individuals by using a people-centred approach for resolving inequalities that affect security’.

\(^2\) For more detailed recommendations on the type of transparency measures and accountability mechanisms which could be included in the EPF, please see the EPLO statement entitled ‘Capacity building in support of development and security for development: Recommendations for implementation’ (May 2018)
3) **Effective coherence with the rest of EU external action**, in particular the EU’s long-term peace and development efforts, should be ensured (e.g. to strengthen the support provided by EU delegations to security sector reform (SSR) processes and wider democratic governance programmes aimed at addressing the root causes of violent conflict). In addition, the principle of Policy Coherence for Sustainable Development (PCSD) should be embedded in the EPF.

4) **Adequate human resources** for the management of the EPF should be guaranteed. The EU officials who will be responsible for its implementation should have the necessary expertise on peace and conflict (including on conflict analysis, conflict sensitivity, gender, human rights, monitoring and evaluation, etc.) and be given adequate time and capacity to assess EPF support.

We are also concerned about the risk of funds being diverted away from civilian conflict prevention and peacebuilding activities, which address the political, social and economic root causes of conflicts. We therefore call upon EU Member States to ensure that support for such activities is maintained under Heading VI (Neighbourhood and the World) of the proposed Multiannual Financial Framework (MFF) 2021-2027.³

Finally, we strongly believe that there is a pressing need for more **public and evidence-based debate** on the added value of the proposed EPF as well as on the necessary safeguards which must be incorporated into it if it is established.

Please do not hesitate to contact me if you have any questions or would like any additional information.

Yours sincerely,

Sonya Reines-Dijvanides
Executive Director, European Peacebuilding Liaison Office (EPLO)

cc: All delegates to the Working Party of Foreign Relations Counsellors
- Mr Pedro Serrano – Deputy Secretary-General for CSDP and Crisis Response, EEAS
- Ms Sofie From-Emmesberger – Chair of the Political and Security Committee, EEAS
- Ms Hilde Hardeman – Head of the Service for Foreign Policy Instruments, European Commission
- Mr David McAllister – Chair of the Committee on Foreign Affairs, European Parliament
- Mr Stefano Grassi, Mr Jani Taivalantti and Mr Giulio Di Blasi – Cabinet of the High Representative of the Union for Foreign Affairs and Security Policy/ Vice-President of the Commission

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³ *Joint NGO letter to EU Heads of State and Government on the EU MFF 2021-2027* (4 December 2018)