

Brussels, 27 February 2020

Dear Ambassador,

Re: The proposed 'European Peace Facility'

I am writing to you on behalf of the European Peacebuilding Liaison Office (EPLO) with regard to next week's debate on the proposal for the establishment of the 'European Peace Facility' (EPF).

EPLO is a platform of 39 European non-governmental organisations (NGOs), NGO networks and think tanks working globally to prevent violent conflict and to build peace. As explained in January 2019¹, we have concerns and questions about the proposed EPF, including but not limited to its military 'Train & Equip' component and the possibility of it being used to fund the provision of weapons and ammunition.

Numerous civil society organisations with expertise on security sector reform have been calling for an in-depth discussion on the political parameters and added value of the EPF proposal before the legal text is considered further.² We therefore welcome the fact that such a discussion will take place next week in the Political and Security Committee (PSC).

While we continue to question the necessity and added value of the EPF, if it is to be established, it will be essential to address the following elements in the political strategy:

1) Clarify the EPF's contribution to increasing human security³ in conflict-affected countries and regions

The EPF is being discussed in the context of a wider debate about the type of player the EU would like to be on the global stage. As different understandings of power, geopolitics and leverage are being proposed, their potential impact on human lives both inside and outside the EU should be considered carefully. Supporting state security without addressing the underlying drivers of conflict can actually be counterproductive. The EPF should have the explicit aim of improving the perceptions and experiences of security by the diverse men, women, boys and girls who are most affected by conflict in the EU's partner countries. Such an inclusive and transformational approach is essential for the EU to have a sustainable impact and to uphold its various commitments on conflict prevention, human rights, the protection of civilians and the achievement of the Sustainable Development Goals.

2) Consider existing EU tools and leverage first

Given the significant human and financial risks associated with military 'Train & Equip' assistance, procedures should be put in place to ensure that other EU instruments (in particular civilian ones) which are capable of achieving the same goals are considered before resorting to the EPF. A guiding question could be: are there other means of improving human security and achieving the EU's long-term peace and development objectives in this partner country or region? The EU already has a wealth of tools and

¹ [EPLO letter to the Political and Security Committee, The proposed 'European Peace Facility'](#), January 2019

² [Joint NGO letter to the European Union Foreign Affairs Council on the proposed EPF](#), May 2019

³ Human security is a people-centred approach to security, 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.

leverage at its disposal. Funds and political attention should not be diverted away from civilian conflict prevention and peacebuilding activities which address the political, social and economic root causes of conflicts. In addition, EPF support should be conditional, *inter alia*, on reforms related to the civilian oversight of military forces in partner countries, human rights, anti-corruption and public financial management to ensure coherence with the rest of the EU's external action.

3) Adopt innovative approaches to risk management, transparency and accountability

As the EPF would provide types of support which are new to the EU, a copy-paste of current management mechanisms will not be sufficient and procedures should be upgraded. For instance, ex-ante box-ticking risk assessments carried out mainly from headquarters would be inadequate. Instead, risk management tools should be used throughout the life cycles of assistance measures (i.e. from preparation to implementation and evaluation), and possibly as part of political dialogues with partner countries. In terms of transparency, continuous information on the type of support provided (e.g. what equipment, for whom, etc.) should be made easily accessible in order to enable adequate oversight by parliaments and civil society, both in the recipient countries and in Europe. To enhance accountability, the creation of an EPF civilian complaints mechanism, which would collect and address potential grievances by affected populations, could also be envisaged.

4) Ensure adequate human resources arrangements for the management of the EPF

The EU officials who will be responsible for the implementation of the EPF should have the necessary expertise on peace and conflict (including on conflict analysis, conflict sensitivity, gender, human rights, protection of civilians, monitoring and evaluation, etc.). In addition, procedures should be put in place to ensure that staff members are a) incentivised to report critically on the implementation in case of potential misuse or worsening of conflict dynamics, and b) given adequate time and capacity to ensure coherence with the rest of the EU's external action in the partner country.

With regard to the process, we understand that next week's debate will not be a one-off but the start of a conversation on the political strategy which would accompany the establishment of this new instrument. We recommend that **civil society experts be involved at all significant points of discussion**, both within and outside the formal proceedings of the PSC. Peacebuilding organisations in particular have a wealth of on-the-ground expertise on engaging with security actors and the impact of military 'Train & Equip' initiatives in fragile and conflict-affected countries. In this context, please see below a non-exhaustive list of civil society publications on the EPF, which can provide additional food for thought both for the political strategy and for the practical safeguards and modalities of EPF implementation.

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 Ambassadors to the Political and Security Committee
All delegates to the Working Party of Foreign Relations Counsellors (RELEX)
Mr Pawel Herczyński – Acting Deputy Secretary-General for CSDP and Crisis Response, European External Action Service (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 (EC)
Mr Stefano Tomat – Director, Directorate for the Integrated Approach for Security and Peace, EEAS
Mr David McAllister – Chair of the Committee on Foreign Affairs, European Parliament
Mr Pedro Serrano and Ms Fiona Lunny – Cabinet of the High Representative of the Union for Foreign Affairs and Security Policy/ Vice-President of the EC

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Annex: Civil society documents related to the proposed European Peace Facility

You will find below a non-exhaustive list of resources on the EPF which can provide additional food for thought:

- [Capacity building in support of development and security for development \(CBSD\): Recommendations for implementation](#), EPLO, May 2018
- [Letter to the Political and Security Committee on the proposed 'European Peace Facility'](#), EPLO January 2019
- [Joint NGO letter to the European Union Foreign Affairs Council on the proposed EPF](#), May 2019
- Appropriate safeguards for military support: conflict-sensitive risk assessment, monitoring and evaluation – Summary report of a workshop co-organised by the Permanent Representation of the Kingdom of the Netherlands to the EU and EPLO, June 2019
- [EU Weapons Exports Will Backfire](#), Klem Ryan, August 2019
- [More Good Than Harm: Why the EU Must Learn From Others' Mistakes to Ensure Better Protection of Civilians through European Peace Facility \(EPF\) Activities](#), Béatrice Godefroy, Center for Civilians in Conflict (CIVIC), August 2019
- [How to strengthen the EU as a force for global peace](#), Mark Furness and Julian Bergmann, Deutsche Institut für Entwicklungspolitik, October 2019
- [EU's new €10bn 'peace facility' risks fuelling conflict](#), Lucia Montanaro and Tuuli Raty Saferworld, November 2019
- [Closing the accountability gap: the case for a complaints mechanism for EU support to security actors](#), Margot Jones, EPLO, February 2020

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