

Explainer: ECA Special Report 15/2025: EU Humanitarian Aid Under Remote Management

These summaries highlight key points from sector reports, focusing on funding and core issues facing NGOs. They aim to help EU-CORD members stay informed and improve their practices. For full context and detail, we encourage reading the original reports.

Purpose of the Report

The [ECA Special Report 15/2025](#) examines the European Commission's use of remote management in EU-funded humanitarian actions from 2019 to 2023. It assesses whether remote management allows the Commission to maintain aid delivery effectively and whether the risks—especially concerning oversight of implementing partners—are properly managed.

Why This Matters

As DG ECHO prepares to revise its guidance, templates, and oversight mechanisms, organisations must be ready to adapt. Whether you are a certified partner, part of a global family structure, or working closely with local actors, the recommendations from this report—and how they are implemented—will affect how you plan, fund, and deliver humanitarian assistance.

DG ECHO Obligations

The European Commission's Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO) is not *legally obliged* to implement the recommendations of the European Court of Auditors (ECA). Still, in practice, these recommendations carry significant institutional weight and often lead to policy or operational changes.

DG ECHO is required to issue a formal response to the ECA report (which it already did in this case), which includes target implementation dates for each recommendation. [In their response](#), DG ECHO agreed with most recommendations and committed to taking actions by 2025 or 2026, demonstrating its intent to comply.

The Commission accepted all four recommendations from the ECA:

Recommendation	Commission Response	Target Implementation
1. Improve the remote management approach and guidance	Agreed – Will update definitions, templates, and integrate into IT systems.	2026

2. Strengthen the certification process for NGO partners	Agreed – Will enhance checks on partners’ capacity to oversee local implementing partners and obtain auditor assurance on NGO “family” headquarters.	2026
3. Verify information in partner reports	Agreed – Will assess proposal information more rigorously and verify monitoring reports on a sample basis.	2025
4. Report transparently to stakeholders	Agreed – Will include data on remote management scope, funding, and outcomes in reporting.	2025

DG ECHO Response overview for EU-CORD Members (Funding Flows & Localisation)

Area of Concern	ECA Observation	Commission Reply	What It Means for Members
Use of family-affiliated IPs	Dilutes certification value if the certified NGO is not the operational lead.	Recognises family structures but demands clear supervision and accountability.	Continue using family structures but document oversight, retain core roles, and ensure audit trails.
Local IPs’ capacity and oversight	No direct assessment by DG ECHO, increasing risk.	Legal responsibility rests with certified NGOs; field monitoring reinforces assurance.	Expect greater scrutiny on local partner oversight in future certification or audits.
Transparency of fund flows	Inaccurate reporting of implementing partners and fund allocations.	The Commission acknowledges the issue; it will act where performance is lacking.	Ensure precise reporting of all fund transfers and implementing arrangements.
Simplification vs. Control	Report pushes for more control, not simplification.	The Commission will balance oversight with current realities.	Administrative demands are likely to increase, but targeted engagement may influence proportionality.

Context

- The EU spent €2.5 billion in 2024 on humanitarian aid; €918 million (8%) was for actions using remote management due to access constraints in 10 countries, including Somalia, Syria, and Ukraine.
- Remote management enables aid delivery in high-risk or conflict settings where international access is limited, relying heavily on local partners, staff or subcontractors.

To assess how the European Commission managed remote humanitarian aid, the European Court of Auditors (ECA) reviewed actions funded by DG ECHO between 2019 and 2023. They examined documentation, guidance, and monitoring tools; conducted interviews with Commission staff, NGO partners, and field personnel; and analysed a sample of 19 remote management projects in three countries: Somalia, Syria, and Ukraine. Their findings are based on both financial tracking and operational performance, with a particular focus on oversight mechanisms and risk management practices.

What the ECA Found to be Working Well

Area	Positive Findings
Remote Management Value	The ECA acknowledges that remote management enabled access to life-saving aid in areas that would otherwise be unreachable, supporting 164 actions (€918 million).
Certification of NGO Partners	The certification process for EU-based NGOs is seen as reducing operational risks. It ensures partners are technically and administratively capable of managing EU-funded actions.
Field Presence of DG ECHO	DG ECHO's field offices, local staffing, and regional sub-offices are praised for helping the Commission adapt to access constraints and regain field visibility where possible.
Alternative Monitoring Tools	Good practices such as third-party monitoring, community feedback mechanisms, and technology-enabled tracking tools were recognised as innovative and useful in restricted contexts.

What the ECA Found Was Not Working or Needs Improvement

Issue	Identified Weaknesses
Outdated Guidance	DG ECHO's remote management guidance is outdated and lacks clarity, especially regarding partial remote management and staff mobility constraints.
Weak Integration in Risk Strategy	Remote management is not embedded in DG ECHO's risk register or control strategy, creating blind spots in fraud, access, and reputational risk assessments.
Poor Design of Reporting Tools	Templates like the remote management questionnaire and quarterly monitoring reports are misaligned with approval criteria, inconsistently used, and not integrated into IT systems.
Oversight of Implementing Partners	ECA is particularly concerned about the lack of assessment of local implementing partners' capacity – whether they are local NGOs or family-affiliated branches. This oversight is delegated entirely to certified NGOs.
Auditing and Verification Gaps	DG ECHO rarely checks the accuracy of partner reports or asks for underlying documentation. Some partner-provided data was incorrect or incomplete.
Lack of Transparency	Final reports do not distinguish between remotely and directly managed activities, making it difficult for stakeholders to track where remote management was used, with what results.

Key Findings Relevant to EU-CORD Members

Funding Flows

ECA Observations on Funding Flows: Key Points to Watch

1. Lack of Visibility and Transparency in Fund Transfers

- In many audited cases, certified NGOs transferred up to 99% of EU funds to non-certified implementing partners — often within their own NGO family (e.g. headquarters or regional offices).
- The ECA found inaccuracies in reporting:
 - Some partners did not disclose the use of implementing partners.
 - Others reported materially incorrect funding amounts given to those partners.

Takeaway for Members:

Certified NGOs must accurately disclose all financial transfers and partnerships in proposals and final reports — failure to do so risks audit flags, reputational harm, and future funding restrictions.

2. Risk of Certified NGOs Acting as ‘Pass-Throughs’

- In some models, the certified EU-based NGO plays only a formal or administrative role, while the actual implementation and financial management are done by family affiliates (non-certified).
- This practice diminishes the value of the certification, which is meant to assure operational capacity and accountability.

Takeaway for Members:

NGOs must demonstrate active involvement and oversight — not just administrative compliance. This means:

- Documented decision-making roles
- Real-time financial control systems
- Strategic engagement in project delivery

3. Absence of Assessment of Implementing Partner Capacity

- DG ECHO does not directly assess the technical or financial capacity of implementing partners — even when they handle nearly all the funding.
- Instead, the burden falls on the certified NGO, but the ECA suggests this is not currently being done thoroughly or transparently enough.

Takeaway for Members:

Organisations must review and strengthen their internal assessment processes for local and affiliated implementing partners, including:

- Capacity assessments
- Risk scoring
- Financial and operational due diligence
- Performance audits

4. Reporting Systems Are Not Designed to Track Funding Flows Clearly

- The EU's single form and reporting tools do not allow for disaggregated tracking of which funds were managed remotely, or by which partners.
- This obscures the financial trail and limits accountability.

Takeaway for Members:

Until DG ECHO updates its systems, NGOs should maintain internal records that clearly track funding by partner, geography, and remote/direct delivery mode. This supports transparency in case of audits or donor reviews.

Implications for Localisation

1. Local Implementing Partners Not Directly Assessed (Point 13, and 61–62)

The ECA criticises that local implementing partners (IPs) — often the only means of accessing populations in remote or insecure areas — are not subject to DG ECHO's own certification or capacity assessment.

While certified partners are legally responsible for their IPs, the ECA suggests this is insufficient assurance, especially in high-risk remote settings.

Implication:

Implication:

This shifts responsibility for due diligence entirely onto the certified NGO, increasing the bureaucratic and legal burden. It also signals distrust in local actors' capacity, despite their central role in humanitarian delivery — a direct contradiction to the goals of localisation.

2. Recommending More Checks on Partner Oversight Systems (Recommendation 2)

ECA recommends that DG ECHO, as part of its certification process, assess how well certified partners can identify, select, monitor, and control their local partners.

This includes even “family” affiliates (international branches or non-EU headquarters), but the burden will likely fall heaviest on small, national NGOs.

Implication:

This could lead to stricter pre-qualification criteria for NGOs working through local IPs, which risks disincentivising partnerships with smaller or less formally structured local actors — even when they are best placed to deliver aid.

3. No Clear Pathway for Local IPs to be Recognised or Empowered

The report does not discuss any mechanisms to strengthen local IP capacity or involve them directly in EU frameworks (e.g. joint monitoring, shared audits, or simplified access to funding).

It emphasises risk containment, rather than local empowerment.

Implication:

This one-sided approach could reinforce a top-down model where local actors remain subcontracted and scrutinised, rather than supported as autonomous and strategic partners. It runs counter to commitments made under the Grand Bargain and the EU's own localisation goals.

4. Contradiction with DG ECHO's Own Policy Commitments

DG ECHO and the European Consensus on Humanitarian Aid commit to "supporting local leadership" and "strengthening local capacities".

However, the ECA's focus on tighter control and risk avoidance may lead DG ECHO to introduce measures that inhibit localisation — such as increased compliance obligations that local partners struggle to meet.

Implication:

There's a policy disconnect between stated commitments to localisation and the operational recommendations being pushed, potentially leading to tokenism in partnerships with local NGOs.

5. No Distinction Between Risk Contexts or Types of Local Actors

The report treats all local implementing partners as uniformly high-risk, whether they are small grassroots organisations or well-established national NGOs. It also does not propose differentiated accountability models or risk-based approaches that would reward stronger local partners.

Implication:

This discourages nuanced engagement with local actors and may punish good local NGOs through blanket assumptions of incapacity, further centralising power in EU-based organisations.

Implications for 'Family' NGO Structures

The ECA notes that certified NGOs frequently rely on implementing partners, particularly those within their international family of affiliated organisations (e.g. a German-certified NGO working with its US headquarters or Jordan office). These family members are not themselves certified and are not subject to direct EU oversight.

Concerns Raised by ECA:

- This dilutes the value of the certification process, because the real operational work may be done by a non-certified entity that has not undergone any direct assessment.
- The ECA criticises this model for creating a situation where the certified partner may have little real control over operations, despite holding the legal responsibility.

Implications:

- Many faith-based organisations and networks (including EU-CORD members) operate in similar federated or family-based models, with strong collaboration between EU and non-EU branches.
- This finding puts pressure on EU-certified entities to demonstrate that they maintain effective oversight over their global or regional family offices.
- The model itself is accepted, but the lack of documented oversight and accountability mechanisms is criticised. NGOs must prove that they retain control over quality, reporting, and risk management.
- These criticisms may result in tighter restrictions on how certified NGOs delegate responsibilities, including to local or regional family offices.
- It could reduce flexibility for international networks, especially those that rely on their regional or field offices for proximity to affected populations.
- If DG ECHO follows the ECA’s advice, it may introduce new requirements for certified partners to provide auditor-backed evidence of their IPs’ capacity, which local or family-affiliated offices may not be ready to produce.

Recommendations for EU-CORD Members

Challenge	Recommended Response
Certification is seen as weakened by indirect implementation	Ensure clear documentation of oversight mechanisms, decision-making structures, and quality control across family structures
Risk of stricter controls on local/family IPs	Proactively assess and document local partner capacity, even if not required, as future funding may depend on it
No pathway for local partner recognition	Engage in advocacy (via VOICE or EU-CORD) for progressive accreditation models that could include trusted local actors.
Increased legal and reputational risk for certified NGOs	Strengthen risk-sharing agreements and internal audits with IPs to maintain accountability without over-centralising control

VOICE Sector Response – Summary

VOICE, the network representing European humanitarian NGOs, expressed serious concern about the direction of the ECA’s recommendations. While acknowledging the report’s recognition of remote management as a critical tool in conflict and hard-to-reach areas, VOICE warns that the proposed emphasis on greater oversight could undermine ongoing efforts to advance localisation. The report places significant focus on the role and

accountability of EU-certified partners, but offers little recognition or support for the local actors who implement much of the aid on the ground.

Additionally, VOICE highlights the growing administrative burden placed on NGOs. Rather than moving toward simplification and flexible funding—principles long championed by the humanitarian community—the report could lead to more complex requirements and stricter reporting obligations. VOICE commits to engaging with DG ECHO to ensure that the operationalisation of the ECA recommendations does not erode the principles of partnership, trust, and subsidiarity that are essential to principled humanitarian action.