Evaluation of the European Union's humanitarian response to the Rohingya refugee crisis in Myanmar and Bangladesh, 2017-2019

Final Evaluation Report

June 2021

Volume 1 – Main Report

ADE
ANALYSIS FOR ECONOMIC DECISIONS

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AAP	Accountability to Affected Populations
ACAPS	Assessment Capacities Project
ACF	Action contre la faim
ACTED-FR	Agency for Technical Cooperation and Development
ADE	Analysis for Economic Decisions
ADH	Aktion Deutschland Hilft
AHA	ASEAN Coordinating Centre for Humanitarian Assistance
ALNAP	Active Learning Network for Accountability and Performance
ARSA	Arakan Rohingya Salvation Army
ASEAN	Association of Southeast Asian Nations
CBA	Community Based Approach
CCCM	Camp Coordination and Camp Management
CERF	Central Emergency Response Fund
CFM	Complaints and feedback mechanism
CFW	Cash for Work
CICR	International Committee of the Red Cross
CMR	Crude Mortality Rate
CRED	Centre for Research on the Epidemiology of Disasters
CS	Case Study
CSO	Civil Society Organisations
CVA	Cash and voucher assistance
DEVCO (DG)	DG for International Cooperation and Development
DFID	Department for International Development (UK)
DG	Director General
DIP ECHO	Disaster Preparedness DG ECHO programme
DRC-DK	Danish Refugee Council
DRR	Disaster Risk Reduction
EAR	Emergency Aid Reserve
EC	European Commission
ECHO (DG)	European Commission Directorate General for Humanitarian Aid and Civil Protection
EDRIS	Electronic Data Research and Innovation Service
EEAS	European External Action Service
EiE	Education in Emergencies
EMAP	Engaging Men through Accountable Practices
EQ	Evaluation Question
EU	European Union
EUR	Euro
EVA	DG ECHO internal project database
EVI	Extremely Vulnerable Individuals

FCA	Forgotten Crisis Assessment
FGD	Focus Group Discussion
FTS	Financial Tracking Service
GAM	Global Acute Malnutrition
GBP	British pound sterling
GDP	Gross Domestic Product
GHD	Good Humanitarian Donorship
HA-FA	Humanitarian Aid – Food Assistance
HAR	Humanitarian Aid Regulation
HARP	Humanitarian Assistance and Resilience Programme Facility
HCT	Humanitarian Country Team
HC/RC	Humanitarian Coordinator/Resident Coordinator
HIP	Humanitarian Implementation Plan
HOPE	Humanitarian Office Programme Environment
HQ	Headquarters
HRP	Humanitarian Response Plan
HRuF	Human Rights up Front
IAF	Integrated Analysis Framework
IASC	Inter-Agency Standing Committee
ICRC	International Committee of the Red Cross
IDP	Internally Displaced Person
IFRC	International Federation of Red Cross and Red Crescent Societies
IHL	International Humanitarian Law
INFORM	Index for Risk Management
INGO	International Non-Governmental Organisation
IOM	International Organization for Migration
IP	International Partners
IRC-DE	International Rescue Committee Deutschland
ISCG	Inter Sector Coordination Group
JC	Judgment criteria
JRP	Joint Response Plan
KAP	Knowledge Attitude Practice
KII	Key Informant Interview
KPI	Key Performance Indicators
LLH	Livelihood
LRRD	Linking Relief Rehabilitation and Development
MHPSS	Mental health and psychosocial support
MIMU	Myanmar Information Management Unit
MIP	Multi-Annual Indicative Programme
MR	mortality rate
MTR	Mid-Term Review

NFI	Non-Food Items
NGO	Non-Governmental Organisation
NRC-NO	Norwegian Refugee Council
NRM	Nexus Response Mechanism
OCHA	UN Office for the Coordination of Humanitarian Affairs
ODA	Official Development Assistance
OECD/DAC	The Organisation for Economic Co-operation and Development/Development Assistance Committee
PDM	Post Distribution Monitoring
PWD	Persons with disabilities
RI-UK	Relief International United Kingdom
SADD	Sex- and age-disaggregated data
SGBV	Sexual and Gender-Based Violence
SEA	South-East Asia
SI	Solidarités International
SRH	Sexual and Reproductive Health
SRHR	Sexual and Reproductive Health and Rights
STC	Save the Children
TOR	Terms of Reference
UK	United Kingdom
USA	United States of America
UN	United Nations
UNDAC	United Nations Disaster Assessment and Coordination
UNDP	United National Development Programme
UNEG	United Nations Evaluation Group
UNFPA	United Nations Population Fund
UNHCR	UN High Commission for Refugees
UNICEF	UN Children's Fund
UNOPS	United Nations Office for Project Services
USD	United States Dollars
WASH	Water, Sanitation and Hygiene
WHO	World Health Organisation
WFP	UN World Food Programme

ABSTRACT

This report is an independent evaluation of the European Union's humanitarian response to the Rohingya refugee crisis in Myanmar and Bangladesh, 2017-2019, as managed by the European Commission's Directorate-General for Civil Protection and Humanitarian Aid Operations (DG ECHO). It draws upon evidence from project data, interviews, remote field visits and a literature review.

The evaluation concludes that DG ECHO has, despite a budget that was not proportionate to the needs, contributed to meeting objectives of preventing and alleviating human suffering, maintaining human dignity and upholding humanitarian principles. This also encompassed a key role in terms of coordination and advocacy. As a large-scale dignified return for the Rohingya is unlikely in the foreseeable future, further development of a joint strategic approach has become even more pressing.

Strategic recommendations targeted at DG ECHO Myanmar and Bangladesh are to 1) develop a multi-year strategy aligned with the Nexus joint response plan, 2) continue innovative approaches at both a country and global level to promote localisation, 3) refine advocacy strategies to promote changes in policy environments and 4) promote consistent attention to cost effectiveness by partners. A recommendation for DG ECHO HQ is to ensure timely and adequate funding to maintain DG ECHO's position as a key facilitator and influencer in the response.

EXECUTIVE SUMMARY

Evaluation subject, scope, timing and purpose

This is the Evaluation Report of the DG ECHO-funded operations humanitarian response to the Rohingya refugee crisis in **Myanmar** and **Bangladesh** during the period 2017 -2019. The main users for this evaluation are staff at DG ECHO HQ and in **Myanmar** and **Bangladesh** with an understanding that forward-looking recommendations may also provide guidance for decision making by other stakeholders, notably other units in the EU Delegation and DG ECHO partners in both countries. Launched in 2020, this evaluation was conducted after the emergency phase had ended and DG ECHO and other donors were looking increasingly at how to transition to more sustainable interventions in operating environments that were not particularly conducive to self-sufficiency. The evaluation's purpose is two-fold. Firstly, it aims at providing an assessment of DG ECHO's strategy/approach. Secondly, the strategic recommendations resulting from this evaluation should help shape the EU's future approach to this crisis, and possibly to other crises of a similar nature.

Methodology

The evaluation was divided into three phases: inception, data collection and synthesis. Data was collected during a desk review, interviews, focus group discussions to be able to respond to the 11 evaluation questions described in the Terms of Reference (TOR) for this evaluation. Three case studies provide supplementary evidence and additional contextual information. The team had originally planned field visits to **Myanmar** and **Bangladesh** during March-April 2020, but these were cancelled due to travel restrictions and public health considerations caused by the COVID-19 pandemic. The methodology was changed to a fully remote design, which included virtual interviews with community members conducted mainly by national experts on the team.

A total of 244 individuals were interviewed, including 42 displaced persons living in camps and 44 individuals from surrounding communities in both countries. Key informants included representatives from European Commission (EC) headquarters, DG ECHO field offices, European Union (EU) Delegations, government officials in Bangladesh, bilateral donors, United Nations (UN) Agencies, national and local authorities, international and local Non-Governmental Organisations (NGOs), and representatives of beneficiary communities. The team also carried out an extensive desk review of policy and strategy documents, other evaluation reports, reviews, studies, and other documents which included an in-depth analysis of a sample of 18 projects.

Most of the main limitations and constraints for the evaluation had been anticipated during the inception phase. However, the global COVID-19 pandemic was a significant unexpected constraint since it triggered a lockdown in Europe, Bangladesh and Myanmar after the evaluation had been launched, but before the planned field visits could take place. Most team members were able to draw upon their knowledge of both countries gained during previous assignments to contextualise desk research and remote interviews. The inability to conduct physical field visits did nevertheless make it more difficult to observe and assess contributions and outcomes of interventions supported by DG ECHO.

Preliminary findings and emerging conclusions were shared with the Steering Group for this evaluation following the data collection phase. A virtual validation workshop involving staff from DG ECHO, partners and other donors provided an opportunity to provide feedback on findings and the relevance and achievability of the recommendations in the draft report.

Summary of Findings

A summary of findings based on the judgement criteria agreed during the inception phase for each of the eleven evaluation questions and complemented by evidence from the three case studies is described below.

Needs assessment and design

Targeting of vulnerable groups was facilitated by DG ECHO's promotion of Accountability to Affected Populations (AAP), gender and protection, notably in **Bangladesh**, which helped in targeting vulnerability while still maintaining their multi-sectoral approach. Data collected during assessments and monitoring not only guided interventions supported by DG ECHO but also helped to increase coverage by regular sharing with other donors and humanitarian agencies through formal and informal coordination systems.

DG ECHO and their partners consulted affected populations through various channels. Sectorial surveys (nutritional surveys, food security assessments, Knowledge Attitude Practices (KAP), hydrological surveys, etc.) complemented the community consultation and engagement campaigns to reflect the communities' feedback. However, in some cases community consultations did not influence programming due to the policy environment. For instance, surveys in **Bangladesh** highlighted a strong preference for full or partial cash assistance instead of in-kind distributions, but government policies have discouraged cash transfers to the displaced Rohingya population.

Strategies adapted to context

DG ECHO's annual programming cycle was well-suited to the dynamic operating environments to meet lifesaving needs during the initial response. DG ECHO's detailed understanding of the context and needs allowed to adapt interventions to constantly changing operating contexts. DG ECHO promoted integration of gender and protection approaches to better address vulnerability and continued to support Disaster Risk Reduction (DRR) interventions.

As the crisis has transitioned into a protracted emergency, DG ECHO's medium- to long-term strategy has been to contribute to the EU's multi-year Nexus action plan for the Rohingya crisis. Unlike many of their peers, DG ECHO lacked a multi-year strategy that clearly articulated their role in the Nexus response plan based on different scenarios.

Proportionality of Funding

The budget allocated to the Rohingya crisis was insufficient to meet the needs that DG ECHO intended to address, especially in **Bangladesh** during the early phases of the crisis. This limited the scale of DG ECHO's response for priorities identified in the Humanitarian Implementation Plans (HIP). Although not at the scale that field staff had anticipated, DG ECHO still did contribute significant funding to the response plans in both countries. DG ECHO's positioning in both countries as a trusted source of information and analysis helped to inform needs assessments of other donors, which helped to improve coverage of priority needs.

Alignment with policies and principles

DG ECHO's strategies and approaches in both countries were largely aligned with relevant policy frameworks and thematic/sector policies, notably in providing incentives to partners to design and implement their interventions using a needs-based approach which as far as possible integrated protection, gender and vulnerability considerations so as to be consistent with humanitarian principles. There was a reasonable level of awareness of humanitarian principles and relevant thematic policies among DG ECHO partners in both countries, particularly with regards to gender and protection.

DG ECHO's emphasis on adherence to humanitarian principles was widely recognized, though some stakeholders felt that this approach at times provoked reactions that impeded practical solutions to meet needs of vulnerable groups, notably in **Myanmar** due to challenges faced by agencies in obtaining the necessary permits to access affected populations.

Coordination with other donors

DG ECHO played an important coordination role with humanitarian donors in both countries. It was perceived by its partners in both countries as an informed and constructive donor that encouraged a coordinated approach. It also played an informal facilitation and supporting role for UN-led coordination which was needed given the "non-traditional" international coordination structures authorised by the two governments (i.e. coordination led by multiple organisations).

DG ECHO's support for NGO Platforms in both countries also helped to ensure there has been a consistent NGO "voice" in coordination fora.

Nexus coordination

The Nexus approach been a catalyst for collaboration within the EU Delegation in **Myanmar** and, since 2019, in **Bangladesh** as it has proved a useful mechanism for developing a joint plan and responding collectively to this complex crisis. DG ECHO staff in both countries regularly participated in Nexus-related consultations and joint missions. DG ECHO's role in supporting the Nexus action plan for the Rohingya crisis had not yet been fully articulated, notably in the form of a coherent scenario-based multi-year plan.

There were some examples of concrete results from the Nexus approach, but available evidence gathered shows also that outcomes have so far remained limited in large part due to the operating context.

EU added value

EU Member State representatives in both countries viewed DG ECHO as a key partner due to its humanitarian expertise, the strength of its analysis and the fact that it is able to maintain a principled approach without being subject to the same pressures as an individual country. DG ECHO's informal humanitarian coordination role was appreciated by EU Member State representatives even if they preferred to fund and manage their own programmes. More broadly, DG ECHO was seen as a humanitarian agency with a strong advocacy voice who did not shy away from sparking debates related to humanitarian principles, even if the issues at times caused discomfort in these politically sensitive operating environments.

Achievement of objectives

Based on a qualitative assessment of outcomes while taking account of the challenging operating environments in both countries, DG ECHO was considered to have been reasonably successful in meeting its stated objectives. Contributions by DG ECHO and their partners have yielded more positive results in **Bangladesh**, where positive changes in lifesaving sector indicators, such as mortality rates and nutritional status, have been observed, based on the sampled projects. In **Myanmar**, "success" has tended to be measured in being able to mitigate against further deterioration in camps where IDPs have being living in sub-standard conditions by meeting basic needs.

Based on a representative sample of projects in the two countries, the majority (90% in **Bangladesh** and 80% in **Myanmar**) of DG ECHO interventions were found to have achieved their objectives in terms of coverage of targeted beneficiary populations. DG ECHO's progressively increased support for protection activities was seen as a key contribution in improving the humanitarian agencies awareness of protection issues.

Advocacy and communication

DG ECHO focused its advocacy efforts on improving AAP and community-based protection approaches, contributing to the evidence base to strengthen the case for cash and voucher assistance (CVA) and improving humanitarian access, which has been a particular challenge in Myanmar. DG ECHO has also joined other donors in advocating for longer-term solutions for displaced populations, including creating conditions that could be conducive to an eventual voluntary return of displaced Rohingya populations to Myanmar.

DG ECHO actively supported developing joint advocacy in both countries to ensure consistent messaging to governments and other key stakeholders, although policy environments in both countries have limited the success of joint advocacy initiatives. There were nevertheless some positive examples of joint advocacy initiatives where DG ECHO has contributed to creating evidence for unconditional/multipurpose cash options for refugees in **Bangladesh** and facilitating the development a common position by the Humanitarian Country Team (HCT) on the government's camp closure policy in **Myanmar**. Periodic missions to both countries by DG ECHO HQ staff, including some high-level missions, provided opportunities to communicate relevant advocacy messages at both country and global levels.

Cost-effectiveness

Much of DG ECHO's efforts to improve cost-effectiveness was at the selection stage of interventions when it attempted to avoid duplicating efforts, encouraged synergies and coordination.

A general lack of cost-effectiveness analyses made it difficult to assess the cost-effectiveness of DG ECHO's actions. The monitoring of efficiency and cost-effectiveness at the project level was inconsistent, with variable attention paid to cost-effectiveness by partners.

Restrictive government policies in both countries were a major impediment to improving cost-effectiveness. Access restrictions and administrative processes have resulted in delays or even suspensions of planning activities. In addition, obstacles to CVA, particularly in Bangladesh, and longer-term approaches have also reduced cost effectiveness.

The fact that DG ECHO is not by its regulations allowed to directly fund national NGOs limited options for reducing overhead costs.

Longer-term planning

Prospects for a safe, voluntary, dignified and sustainable repatriation of Rohingya refugees to **Myanmar** remained dim. The massive influx into **Bangladesh** put significant pressure on local resources giving rise to social tensions between the Rohingya and host communities, notably reduction in unskilled labour wages, shrinking water tables and environmental destruction.

Restrictive policy environments in both countries have posed significant limitations on sustainable medium- to longer-term planning and programming. While DG ECHO has continued to advocate for funding to support a coherent strategy that recognises the reality of a protracted crisis, DG ECHO has allocated most of its resources to meeting humanitarian needs, particularly in Bangladesh where in a matter of few weeks close to 1 million people sought refuge from violence in Myanmar. Nevertheless, while 2017/2018 were mostly dedicated to respond to prevailing humanitarian needs, sectors like healthcare, nutrition, education and disaster preparedness offered more sustainable prospects for both host and refugee communities.

DG ECHO has nevertheless managed to facilitate the work of development actors, mainly through real-time information sharing and analysis. Exit strategies for DG ECHO in both

countries remained a remote prospect due to policy and operating environments that are not conducive to an early and dignified return to **Myanmar**.

Summary of conclusions and recommendations

A concise summary of the conclusions and recommendations appear below. The complete set of conclusions and recommendations – supported by operational guidance - are listed at the end of this report.

Conclusions

Conclusion 1: DG ECHO support contributed to better addressing vulnerability by giving an increased attention over time to gender, education, and protection in its own support and through advocacy.

Conclusion 2: DG ECHO's annual programming cycle was well-suited to meet lifesaving needs in the context of the Rohingya crisis, particularly during the initial phase of the response. DG ECHO lacked however a longer-term approach adapted to this protracted crisis, although good progress has already been made in this direction with the development of a Nexus action plan.

Conclusion 3: DG ECHO's budget was not proportionate to the needs they intended to address, notably at the onset of the crisis, and the rationale behind the level of funding decided by DG ECHO was not entirely clear. Yet, DG ECHO played a significant role in the response by serving the most pressing needs and filling service gaps as well as by providing its overall recognised experience and knowledge across many sectors.

Conclusion 4: DG ECHO's strategies and approaches in both countries were aligned with relevant policy frameworks and thematic/sector policies.

Conclusion 5: DG ECHO played an important coordination and advisory role for humanitarian donors in both countries in the unusual context of coordination being co-led by several organisations.

Conclusion 6: DG ECHO provided added value to the overall response in both countries by using its in-depth understanding of humanitarian needs, analysis, and advocacy to support an interagency response to the crisis and through its important coordination and advisory role.

Conclusion 7: DG ECHO interventions generally achieved their objectives in terms of coverage of targeted beneficiary populations, and meeting Sphere standards in the nutrition and WASH sectors.

Conclusion 8: DG ECHO's advocacy has influenced humanitarian stakeholder approaches and interventions but has struggled to achieve the broader impact needed outside the humanitarian sphere.

Conclusion 9: The approach by DG ECHO Myanmar and Bangladesh to localisation and NGO coordination has been innovative but was ad hoc rather than strategic.

Conclusion 10: DG ECHO has taken steps to encourage cost-effectiveness among its partners but, despite examples of cost-effective behaviour, partners have been inconsistent in applying guidelines and their attention to cost effectiveness.

Recommendations

Recommendation 1: DG ECHO offices in **Bangladesh** and **Myanmar** should develop a multi-year strategy that aligns with the Nexus response plan for the Rohingya, adapting to the specific context in each country, using external facilitation and technical support as required.

Recommendation 2: When deciding on funding allocations, DG ECHO HQ needs to 1) clarify the rational for funding levels, 2) improve the timeliness of fund allocations, and 3) ensure that DG ECHO offices in Myanmar and Bangladesh continue to receive sufficient funding to engage successfully in a multi-sector strategy.

Recommendation 3**:** DG ECHO should continue its innovative approaches to promote localisation via its funding and technical support to NGO coordination to ensure that NGOs continue to have an important "voice" within the humanitarian community while also creating incentives for collaborative actions.

Recommendation 4: DG ECHO Offices in **Bangladesh** and **Myanmar** should further improve the effectiveness of their advisory and advocacy role by building upon their areas of strength.

Recommendation 5**:** DG ECHO Offices in **Bangladesh** and **Myanmar** should improve attention to cost-effectiveness of interventions for the Rohingya crisis through facilitating improved application of cost-effective systems and approaches while ensuring that relevant community feedback is considered when reviewing project design and implementation.

1.   EVALUATION PURPOSE, SCOPE AND FRAMEWORK

This is the Evaluation Report of the DG ECHO-funded operations humanitarian response to the Rohingya refugee crisis in **Myanmar** and **Bangladesh** during the period 2017-2019. Figure 1 below summarises the evaluation's subject, purpose and scope.

Figure 1 – Evaluation purpose, scope and framework

EVALUATION PURPOSE		EVALUATION SCOPE	
Retrospective dimension	**Prospective dimension**	**Temporal**	2017-2019
Assess the EU humanitarian response to the Rohingya refugee crisis	Provide 5 strategic recommendations to support EU's future humanitarian approach to refugee crises	**Spatial**	Myanmar (Rakhine State) and Bangladesh (Chittagong Division)
Horizontal dimension		**Thematic**	**All DG ECHO's interventions,** notably in the sectors of food & nutrition, protection, health, WASH, shelter, DRR, CBA, and accounting for gender & age, cross-border and integrated projects
Feed the evaluation of EU's implementation of the gender strategy			

EVALUATION FRAMEWORK	
Evaluation questions	A set of 11 evaluation questions covering **relevance** (in terms of budget, targeting and consultation of beneficiaries, strategy and flexibility) **coherence** (with humanitarian principles and policies), **EU added value**, **effectiveness** (own achievements and advocacy results), **efficiency** (cost-effectiveness) and **sustainability** (humanitarian-development links, repatriation and exit strategies).
Additional tasks	Reconstruct an **intervention logic**, define and **analyse DG ECHO's portfolio, identify** the main **lessons learnt** from EU-funded actions and the main **success-limiting factors**, provide a statement on the **validity of evaluation results**, propose a **dissemination strategy**
Case studies	1. **Protection, with a specific focus on Gender issues in the Cox's Bazar area** 2. **Transitioning from emergency relief to exit strategies**, with specific focuses on UNHCR's durable solutions and the humanitarian-development Nexus in these settings 3. **Operating in sensitive and/or politically complex contexts**, with a specific focus on applying humanitarian principles in the Rohingya crisis

Source: ADE

This evaluation was undertaken to fulfil the Commission's commitment to regularly assessing humanitarian aid operations financed by the European Union in order to establish whether they have achieved their objectives and to produce guidelines for improving the effectiveness of subsequent operations. In addition to its accountability dimension, it has also a strong forward-looking dimension since the results should not only help to guide EU's future humanitarian approach to this crisis but also for other protracted displacement crises. The case study of the Rohingya population in **Bangladesh** using a gender lens should further inform implementation of DG ECHO's gender policy.

The evaluation focused on DG ECHO's interventions as an important component of the EU's response to the Rohingya refugee crisis and specifically on the interventions in **Myanmar** Rakhine State and **Bangladesh** Chittagong Division. The interventions not only covered displaced Rohingya communities, but host communities affected by the crisis on both sides of the border.

The audience for this evaluation is expected to be DG ECHO staff in **Myanmar**, **Bangladesh** and HQ in addition to citizens of EU Member States. The evaluation may also provide useful guidance for decision-making by other stakeholders, notably other units in the EU Delegation, DG ECHO partners in the two countries and other humanitarian and development donors.

Timing of the evaluation

Launched during early 2020, this evaluation came at a time after the emergency phase ended and humanitarian agencies and donors were increasingly focused on transitioning to more sustainable interventions in operating environments that were not particularly conducive to self-sufficiency. It also came at a critical time for Nexus-related interventions as DG DEVCO was in the process of designing their next long-term strategy relating to the Rohingya crisis. Although the original scope of the evaluation was 2017 - 2019 some additional elements linked to the response to the pandemic during 2020 have been considered in the report.

2. CONTEXT OF THE EVALUATION

The Rohingyas from **Myanmar**'s Rakhine State have experienced systematic discrimination for nearly half a century, including statelessness, extreme poverty, segregation, and restrictions on freedom of movement that resulted in the forced displacement of thousands of people. Starting from the late 1970s, this has resulted in successive waves of forced displacement mainly into **Bangladesh**, but also the establishment of Rohingya communities in Malaysia, other countries in South-east Asia, the Indian subcontinent, and parts of the Middle East. The latest displacement was triggered by an escalation of violence during 2017 between a group known as the Arakan Rohingya Salvation Army (ARSA) and **Myanmar** security forces.

The recent crisis resulted in the displacement of record numbers of Rohingya following a similar pattern, with most seeking refuge in **Bangladesh** while others joined small Rohingya communities in other countries. Between 25 August and 22 September 2017 an estimated 429,000 Rohingya crossed into **Bangladesh**.[1] By the end of 2019, 855,000 Rohingya refugees (51% of them women and girls, 49% men and boys) were being assisted,[2] mainly in Cox's Bazar, far outnumbering the remaining Rohingya population in **Myanmar**.[3]

2.1 Key contextual elements: Bangladesh

With a population of 166 million, **Bangladesh** ranks 135 out of 188 in the 2019 UNDP Human Development Index.[4] and scores 6.0 in the 2019 INFORM RISK (7.5/10 for hazards and exposure and 5.6/10 for vulnerability). This places it in the "High and stable" risk category.[5] Cox's Bazar district, where the vast majority of the Rohingya are accommodated, is the second poorest district of **Bangladesh.**

EU presence in the region dates back to 1994, when the DG ECHO first funded relief interventions in Cox's Bazar. Since then, the EU opened offices in Dhaka (2002) and recently in Cox's Bazar (2017) to supervise the delivery of EU humanitarian assistance. With more than 80 per cent of the population in **Bangladesh** potentially exposed to natural disasters, DRR interventions targeted at both host and displaced populations have been a core component of DG ECHO's programme since the 1990s.

2.2 Key contextual elements: Myanmar

*W*ith a population of around 53.8 million, 40% of which are ethnic minorities, **Myanmar** ranked 145 out of 188 in the 2019 UNDP Human Development Index[6] and scores 6.6 in the 2019 INFORM RISK (8.6/10 for hazards and exposure and 5.3/10 for vulnerability) This places it in the "Very high and stable" risk category.[7]

Myanmar has experienced significant and rapid change over the past decade. Restrictive measures imposed by the EU were suspended in April 2012 and lifted in 2013 (apart from the arms embargo) in order to encourage the reform process. A civilian-led government took over in April 2016 after more than five decades of military rule.

Over the years, the authorities in **Myanmar** have announced different identification regimes for the Rohingya, steadily eroding their rights. As noted in a 2019 DFID report, this widespread poverty, poor infrastructure, and a lack of employment opportunities in Rakhine State have aggravated the division between the Buddhist population and the Rohingya.[8]

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[1]   IOM (2017) Situation Report: 22 September 2017.
[2]   ISCG (2020) 2020 Joint Response Plan: Rohingya Humanitarian Crisis
[3]   European Union (2020), Action Document for "Responding to the needs of the Rohingya population in Cox's Bazar, Rakhine State and host communities in **Bangladesh**".
[4]   UNDP (2020) Human Development Report 2019
[5]   INFORM Severity Index for 2019
[6]   Ibid
[7]   Ibid
[8]   DFID (2019), Reviewing the Evidence Base for Reintegrating Populations Displaced by Conflict.

2.3 DG ECHO Funding

Overall, DG ECHO's funding allocated to the Rohingya refugee crisis in **Bangladesh** and **Myanmar** amounts to approximately EUR 111 million between 2017 and 2019. **Bangladesh** is by far the most important recipient with around EUR 82 million, corresponding to 74% of the total budget (Figure 2). A total of 47 actions for the Rohingya crisis were funded in **Bangladesh** (12 in 2017, 19 in 2018 and 16 in 2019) and 28 in **Myanmar** (9 in 2017, 11 in 2018 and 8 in 2019).

Figure 2 – Funding Trends (2017-2019)
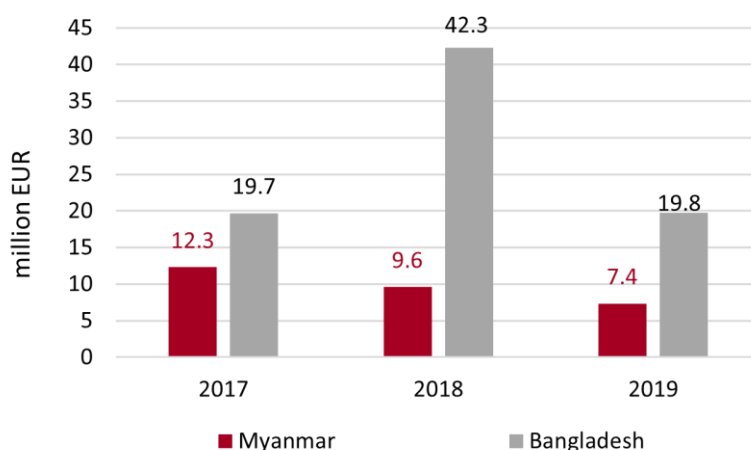
Source : ADE's calculation based on DG ECHO's Hope database.
Note: For Myanmar and Bangladesh, we are focusing on a list of interventions sent by DG ECHO which covers all projects related to the Rohingya refugee crisis in Bangladesh and Myanmar. In Myanmar, part of the interventions are also directed to the conflicts in Kachin and Shan.

In each country, the evaluation focuses on DG ECHO's portfolio of activities related to the Rohingya response (although in **Myanmar** some of the activities also focused on the humanitarian response in Kachin and Shan states).[9] According to Financial Tracking Service (FTS) data, DG ECHO was among the top 5-6 donors in **Myanmar** and **Bangladesh** during the period 2017-2019. In **Bangladesh**, DG ECHO's overall contribution ranged from 4.7% of the Joint Response Plan (JRP) funding requirements in 2017 to 1.8% during 2019 (Figure 3). The USA and the UK are the main contributors to the JRP, with DG ECHO's contribution being comparable to Australia's contribution. In **Myanmar**, DG ECHO's contribution to the Humanitarian Response Plan funding requirements ranged from 6.8% in 2017 to 5.6% in 2019. The USA was again by far the largest donor in **Myanmar**, where DG ECHO's contributions are comparable to those of Germany (Figure 3).

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[9] Note that some funded activities were not directly related to the Rohingya crisis itself, such as DRR for floods and cyclones.

Figure 3 –Share of top 5 donors total contribution to Joint Response Plans

Bangladesh (% of the JRP requirements)

Source: ADE's calculation based on FTS data

Myanmar (% of the HRP requirements)
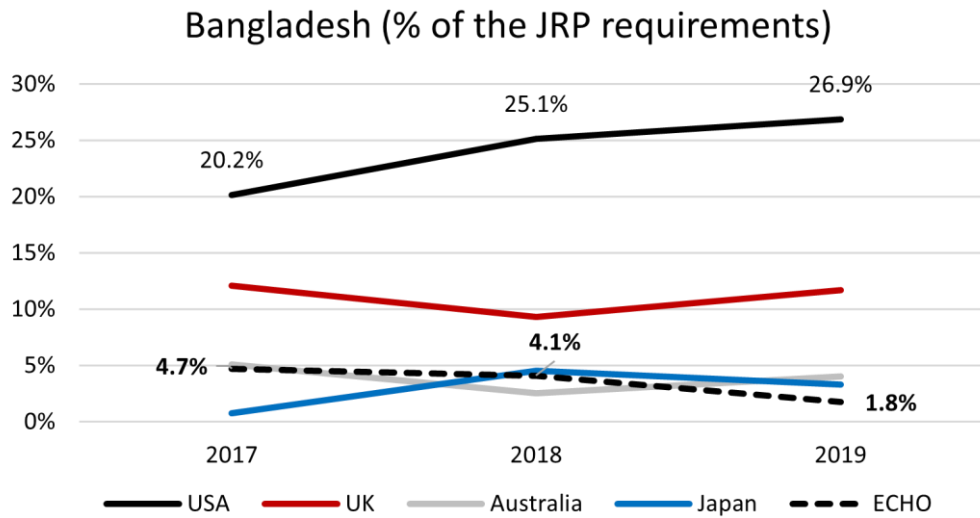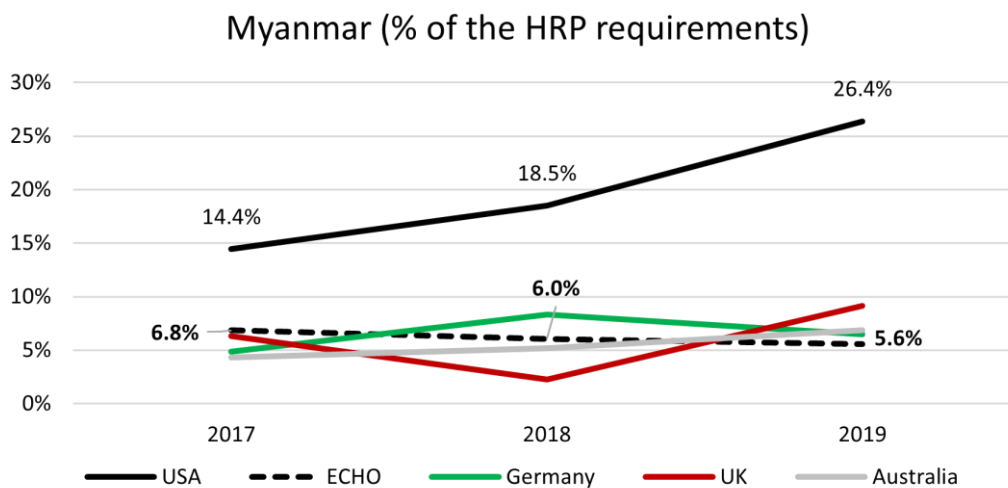
Source: ADE's calculation based on FTS data

As shown in Figures 4 and 5 below, NGOs collectively received more than 50% of DG ECHO funding in each country.[10] In **Myanmar**, UN agencies accounted for approximately 30% of DG ECHO's funding. In **Bangladesh** this component amounted to some 40%. DG ECHO worked with 15 implementing partners in **Myanmar** and 24 in **Bangladesh** composed mostly of UN agencies (WFP, IOM, UNHCR, UNICEF, UNFPA, UNDP) and international NGOs. In **Bangladesh** 3 major partners, WFP, ACF and IOM, were allocated approximately half of the budget during 2017-2019.

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[10]　NGOs also received donor funding channeled via UN agencies and the comparative value-added of direct and indirect funding will be part of the analysis under EQ 10.

Figure 4 – DG ECHO funding of partners Myanmar (2017-2019)
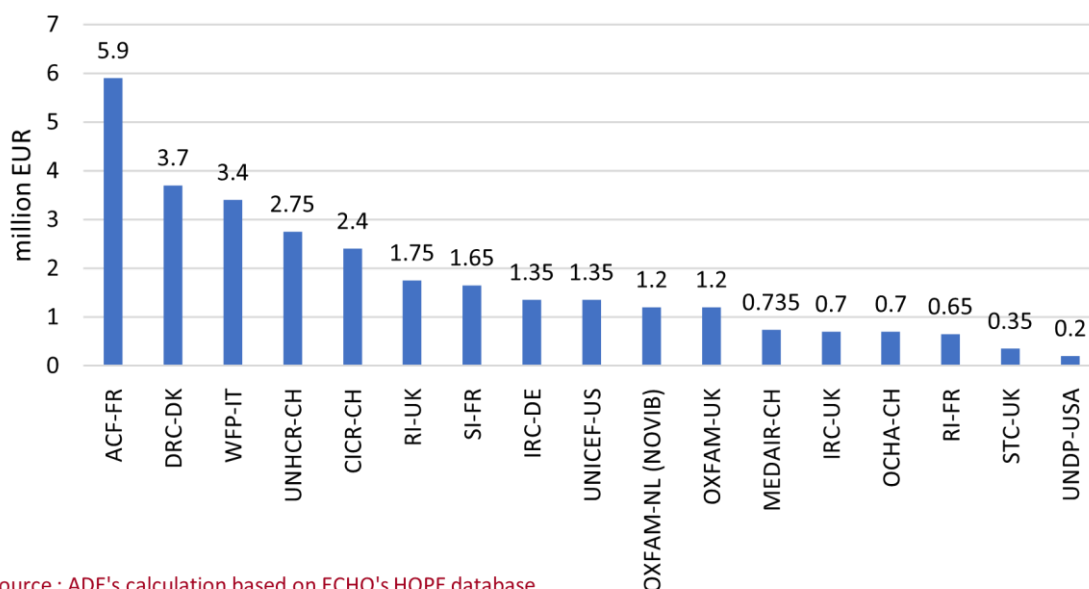
Source : ADE's calculation based on ECHO's HOPE database

Figure 5 – DG ECHO funding of partners Bangladesh (2017-2019)
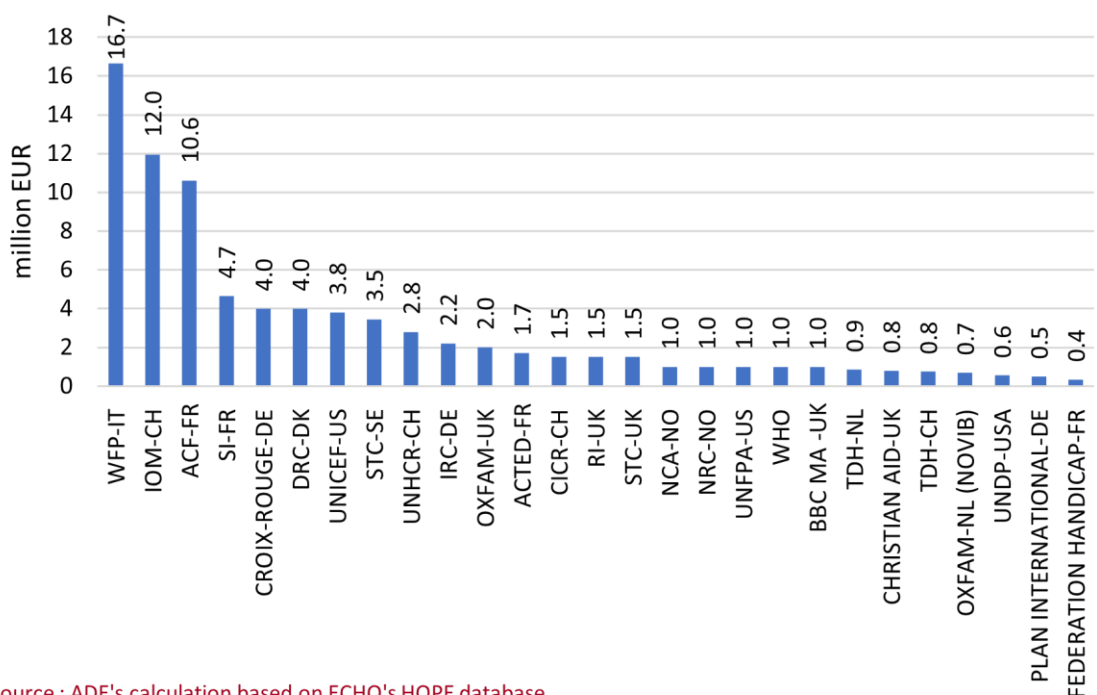
Source : ADE's calculation based on ECHO's HOPE database

2.4 EU Funding for International Cooperation and Development

Funding for the 2014-2020 Multi-Annual Indicative Programme (MIP) of the DG for International Cooperation and Development (DG DEVCO) for **Myanmar** amounted to 688 million Euros allocated to four focal sectors: rural development, education, governance and peacebuilding.[11] Even though the EU was the fourth largest donor in terms of aid volume, this only amounted to some 5-10% of **Myanmar**'s total ODA in 2018.[12]

The total MIP allocation for 2014-2020 for **Bangladesh** was €655 million allocated between three sectors i) Democratic Governance, ii) Food and Nutrition Security and Sustainable

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[11] European Commission (2018), Special Report No 4/2018: EU Assistance to **Myanmar**/Burma.
[12] DG DEVCO (2018), EU Development Cooperation with **Myanmar**. Country fiche **MYANMAR** 03/12/2018.

Development, and iii) Education and Human Development. The EU was the 7th largest ODA provider in **Bangladesh** in 2019.[13]

2.5 DG ECHO response

The timeline in Figures 6 et 7 below presents a snapshot of DG ECHO's interventions in **Myanmar** and **Bangladesh** during 2017-2019 related to the Rohingya refugee crisis.

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[13] DG ECHO (2019), Country fiche **Bangladesh** February 2019.

Figure 6 – Timeline of DG ECHO programming in Myanmar 2017-2019

Figure 7 – Timeline of DG ECHO programming in Bangladesh 2017-2019

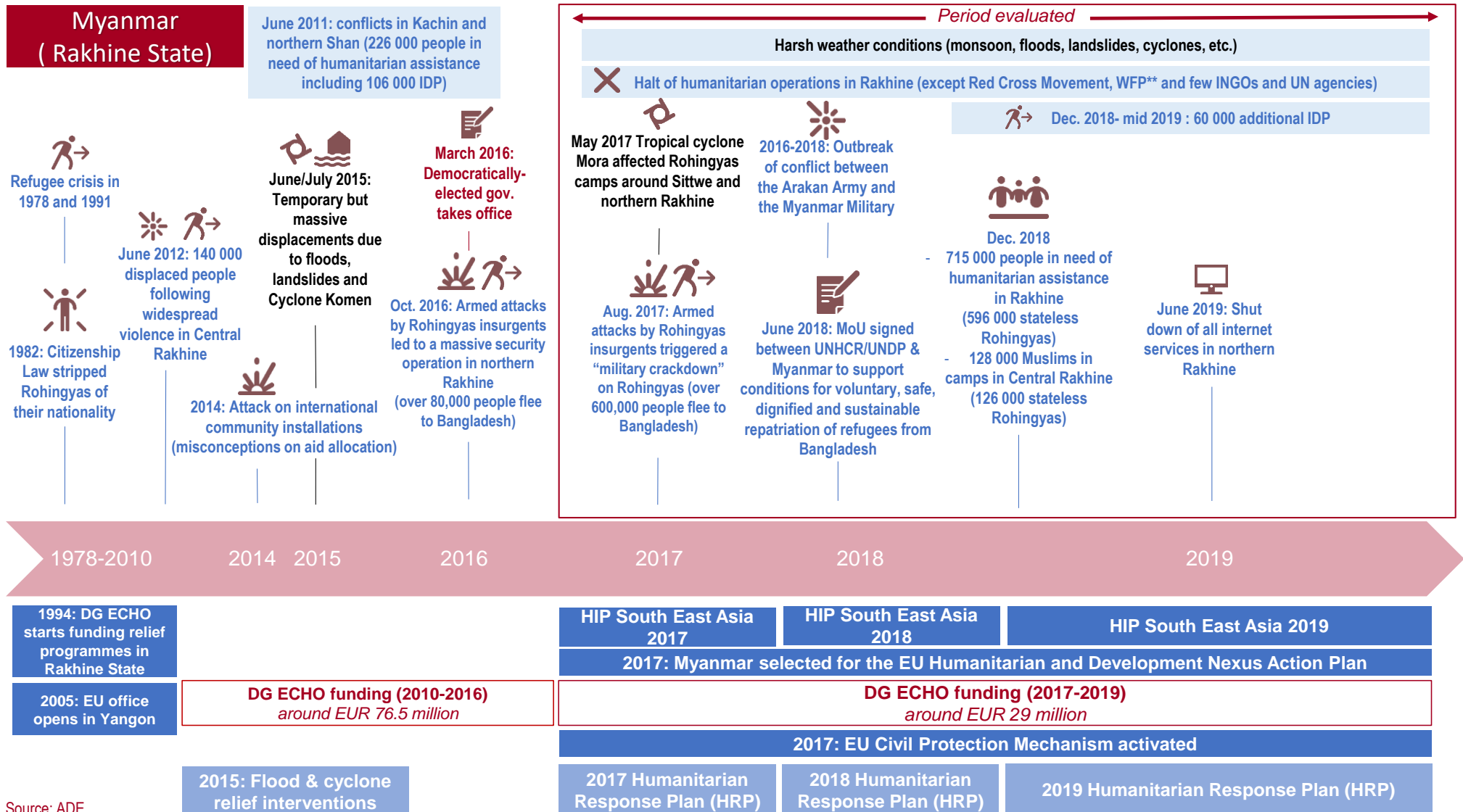**Bangladesh (Chittagong Division)**

Period evaluated

Harsh weather conditions (Monsoon, floods, cyclones, landslides, etc.)

Influx of refugees in 1978 and 1991

2014: Bangladesh launched a National Strategy for Undocumented Myanmar National

May 2016 Tropical Cyclone Roanu affecting 1,3 million people in Cox's Bazar

May 2017 Tropical cyclone Mora affected it Bangladesh especially Cox'Bazar where most Rohingya refugee live

Jan. 2019
- **1.2 M people in need of humanitarian assistance in Chittagong Division (900 000 Rohingyas refugees)**
- **128 000 Muslims in camps in Central Rakhine (126 000 stateless Rohingyas)**

1982: Citizenship Law stripped Rohingyas of their nationality

June 2015: Monsoon and Cyclone Komen directly impacted Cox's Bazar through destruction of life stocks and houses

Oct. 2016: Influx of 80,000 Rohingya refugees in Cox's Bazar following security operation in northern Rakhine

Aug. 2017: influx of 600,000 of Rohingya due to a "military crackdown" on Rohingyas following armed attacks by insurgent

June 2018: MoU signed between UNHCR/UNDP & Myanmar to support conditions for voluntary, safe, dignified and sustainable repatriation of refugees from Bangladesh

Jan 2018 - Jan. 2019: 16 000 additional Rohingya refugees arrived in Cox's Bazar

1978-2010	2014	2015	2016	2017	2018	2019

1994: DG ECHO start funding relief programmes in Cox's Bazar

HIP South East Asia 2017

HIP South East Asia 2018

HIP South East Asia 2019

DG ECHO funding (2007-2016) *around EUR 35 Million*

2017: Sub-office opens in Cox's Bazar

ECHO funding (2017-2019) *around EUR 82 million*

2002: EU office opens in Dhaka

2017: EU Civil Protection Mechanism activated

2017 Joint Response Plan (HRP)

2018 Joint Response Plan (HRP)

2019 Joint Response Plan (HRP)

Source: ADE

3.   METHODOLOGY

This was a theory-based evaluation built around a reconstructed intervention logic, and responses to a set of 11 Evaluation Questions (Table 1) supported by three case studies. The evaluation was implemented in four phases, inception, data collection, synthesis and validation. The team developed and used an evaluation matrix to collate and analyse the data. A mixed methods approach was used to collect and validate data and findings. Interview guides (see Annex 5) were also based on the evaluation matrix.

Figure 8 – Evaluation Framework
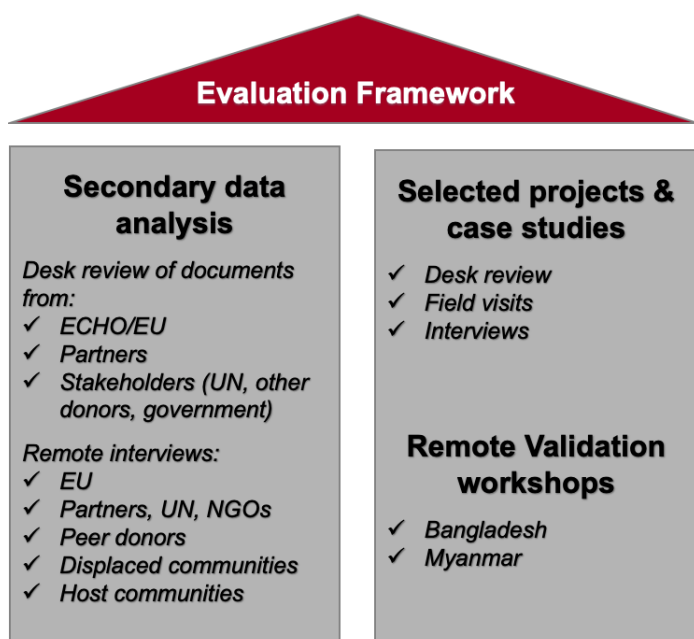
The methodology aimed to address the requirements of the TOR (Annex 12), while managing the challenges listed below and tailoring the evaluation's approach to the specific operating context to answer 11 evaluation questions (Table 1).

Table 1 – Evaluation Questions

No.	Theme	Criteria
EQ 1	Meeting the needs of the most vulnerable	Relevance
EQ 2	Strategies adapted to context	Relevance
EQ 3	Proportionality of Funding	Relevance
EQ 4	Alignment with policies and principles	Coherence
EQ 5	Coordination with other donors	Coherence
EQ 6	Nexus coordination	Coherence
EQ 7	EU added value	EU added value
EQ 8	Achievement of objectives	Effectiveness
EQ 9	Advocacy and communication	Effectiveness
EQ 10	Cost-effectiveness	Efficiency
EQ 11	Longer-term planning	Sustainability/Connectedness

Source: ADE

The evaluation faced significant, and **unexpected, challenges due to the** COVID-19 **pandemic which caused cancellation of field visits** planned during March-April 2020 and a switch to a fully remote design. Field visits planned during March-April 2020 had to be cancelled due to the pandemic. The team redesigned the evaluation to accommodate a

remote approach, including remote "field visits". The revised approach placed greater emphasis on secondary data and remote interviews. It relied much more on national consultants in each country to conduct remote key informant interviews. This included interviews with government officials in Bangladesh, displaced persons living in camps and in surrounding communities and national staff of humanitarian organisations based in Rakhine State and Cox's Bazar.

The main changes due to the remote design were a) an extended evaluation period, b) increased support from field staff of DG ECHO partners to organise interviews with community members c) more time allocated for coordination within the team and with DG ECHO's Evaluation Manager, and d) greater reliance on national experts to provide contextual inputs and ground-truth findings and analysis.

The team compiled an extensive library of over 3,000 documents, of which a total of 94 are listed as key references in the annex. Other reference documents included single form reports, annexes, and logical frameworks for a sample of 18 projects (out of a total of 75 projects in both countries) selected for more detailed analysis.

A total of 244 individuals were interviewed, including 42 displaced persons and 44 members of surrounding communities in both countries. Other key informants included 19 EU staff and 139 staff of implementing and strategic partners of DG ECHO. Regarding key informants, 134 were based in Bangladesh, 97 in Myanmar and the remainder were representatives at a global or regional level. 125 (51 percent) of key informants were male and 118 (49 percent) were female.

Key informants were purposely selected based on a stakeholder mapping that was periodically reviewed by team members and reprioritised as needed to ensure as representative a sample as possible. Since most staff involved in the initial response were no longer in Myanmar or Bangladesh, they were interviewed in their new duty stations. Despite the challenges of competing with personal and professional priorities faced by agency staff dealing with the impacts of the pandemic, the team was able to interview a reasonable cross-section of stakeholders. The team used a "snowball" approach for selecting and prioritising key informants by asking for recommendations and introductions during interviews. A standard question asked was thus "*who else do you think that we should speak to*".

Preliminary findings and emerging conclusions were presented to the Steering Group for this evaluation at the end of the data collection phase. A virtual validation workshop involving staff from DG ECHO, partners and other donors provided an opportunity to provide feedback on findings and the relevance and achievability of the recommendations in the draft report.

3.1 *Reconstructed intervention logic*

The methodological framework for the evaluation used a theory-based approach. This approach involves a reconstructed intervention logic that illustrated DG ECHO's planned interventions in **Myanmar** and **Bangladesh** developed and validated by the evaluation team during the inception phase (Annex 11). The intervention logic aimed to show how support was targeted to serve as a reference framework for the evaluation, in particular by helping to define and structure the evaluation questions. Since DG ECHO did not use an intervention logic to guide its work, the team used this as only one of several reference points when assessing DG ECHO's performance.

3.2 Limitations and Constraints

Most of the main challenges and limitations had been identified during the inception phase, including:

- **The evaluation covered two countries**. As the evaluation covered DG ECHO's support in both **Myanmar** and **Bangladesh**, similarities and contextual differences were considered when undertaking the analysis and drafting the conclusions and recommendations.

- **The scoping period included the emergency phase characterized by a dynamic operating environment and high staff turnover**. Evaluative judgements took into account rapidly changing and evolving operating contexts, obstacles to implementation and how DG ECHO and their partners adapted their interventions based on updated assessments. There were very few international staff still in either country who were present during the emergency phase and wherever possible former staff members were interviewed in their current duty stations so as to obtain a longitudinal perspective of the response.

- **There were a wide range of stakeholders implicated in DG ECHO's response** to the Rohingya crisis, including host governments, other EU Member States, peer donors, international and national NGOs, technical experts in addition to the affected communities themselves (host and displaced). The team used a stakeholder map that was regularly updated to track and prioritise key informants to ensure a broad perspective. The team also benefited from an extensive library of secondary data, particularly for **Bangladesh** where several agencies had already completed evaluations and reviews.

As described above, a key challenge encountered during the data collection and analysis phase was the lockdown in Europe, **Bangladesh** and **Myanmar** due to the **global COVID-19 pandemic**. The team addressed this by revising the design to accommodate a remote evaluation approach. This proved workable although the team had to address certain challenges, including:

- Arranging remote interviews proved to be more time-consuming than a field visit, particularly since many of the stakeholders targeted for interviews were involved in the response to the COVID-19 pandemic.

- There was comparatively less interaction between evaluation team members and DG ECHO field staff than would have been the case with a field mission.

- Most interviews yielded good quality data that contributed to the evidence base. In the end, perspectives from most major stakeholder groups were taken into consideration, including remote interviews and focus group discussions with representatives of camp populations and surrounding communities. A key gap was the comparative lack of a host government perspective, which was mainly compensated for through use of relevant secondary data, including key informants who had regular contact with authorities at both national and regional levels.

- Lack of a field visit made it more difficult to draw conclusions about some of the judgement criteria. Team members were unable to gather observation-based evidence that could have contributed to an independent assessment of qualitative outcomes of ECHO-supported interventions and the extent that these contributed to the overall response. It also limited the team's ability to assess unintended outcomes and impacts.

3.3 Robustness of Results

Validation workshops conducted after the data collection phase had been completed using a remote design facilitated by evaluation team members for DG ECHO staff and partners

helped in validating preliminary findings and conclusions while discussions in working groups focused on discussing draft recommendations.

Given the complex nature of the Rohingya crisis, it was fortunate that the national consultants and three of the international team members had previous knowledge of the operational contexts of both countries acquired during several previous evaluations and reviews over the course of several years. There was a good level engagement by staff from DG ECHO, partners and community members with the evaluation process. Field-based staff of DG ECHO partners provided invaluable support to the team in addressing these challenges and helped to ensure that the evaluation team was able to provide reasoned judgements for most aspects of the interventions in each country.

Despite the limitations faced, the team felt that the evaluation should provide a reliable basis for decision-making. This view was reinforced by the results of the validation workshop, where participants confirmed the relevance of the proposed recommendations while highlighting specific risks and constraints that will need to be taken into account when developing a follow up action plan.

4.   RESPONSE TO EVALUATION QUESTIONS

This section presents findings relating to the eleven evaluation questions in the TOR. Findings for each evaluation question are presented below based on the evidence collected from interviews and document reviews based on judgement criteria and indicators in the evaluation matrix. Some findings are common to both countries whereas others are relevant to a specific country.

EQ1 Meeting the needs of the most vulnerable

EQ 1	To what extent did the design and implementation of EU-funded humanitarian actions addressing the Rohingya crisis take into account gender-age and persons with disabilities, in order to identify and meet the needs of the most vulnerable? To what extent were affected populations consulted during the design and implementation of EU-funded projects?[14]

Summary Response to EQ 1
• The crisis resulted in a high degree of vulnerability for the Rohingya in both countries due to trauma, extreme violence, uncertainty, insecurity, a lack of freedom of movement and restricted access to livelihoods and basic services. As population movements decreased there was an evolution of ECHO-funded multi-sectoral interventions to better address specific needs of the women, children, the undernourished, the elderly and people with disabilities. GBV survivors were also targeted for assistance, although partners faced challenges due to cultural norms.
• Addressing needs of vulnerable groups was facilitated by DG ECHO's promotion of Accountability to Affected Populations (AAP), notably in **Bangladesh**, and an increased focus on gender and protection over time both in camps and surrounding communities. Data collected during assessments and monitoring not only guided interventions supported by DG ECHO but also helped to increase coverage by regular sharing with other donors and humanitarian agencies through formal and informal coordination systems.
• Due to access constraints and government restrictions on surveys in **Myanmar**, there was comparatively more reliance on local actors and remote monitoring and partners in both countries. Partners made extensive use of outreach teams of community workers and local volunteers from the camps or surrounding communities.
• DG ECHO and their partners consulted affected populations through various channels. DG ECHO partners established community feedback and complaints systems, and in **Bangladesh**, DG ECHO was one of two donors supporting a Common Service for Community Engagement and Accountability initiative. While regular consultations have taken place, community members were unsure as to the extent that their feedback was actually being considered. This was partly due to the challenges of the operating context. Surveys in **Bangladesh** highlighted a strong preference for full or partial cash assistance instead of in-kind distributions, but government policies prohibited most cash transfers to the Rohingya population.
• Surveys and monitoring have found that communities did not necessarily feel that their views were adequatnly considered during decision-making which has had implications for effectiveness, including cost-effectiveness.

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[14]   Unless specified otherwise, references to DG ECHO funding refer to allocations for the Rohingya refugee crisis.

Addressing needs of the most vulnerable

There was a relatively high degree of vulnerability within the Rohingya population due to a combination of trauma, extreme violence, uncertainty, insecurity, lack of freedom of movement and access to livelihoods and basic services.[15] Both Rakhine State in **Myanmar** and Cox's Bazar district in **Bangladesh** are fragile areas prone to natural disasters, and the large-scale displacement increased vulnerability of these populations, with the ongoing conflict affecting communities in **Myanmar**.

In order to prioritise the needs, funding and develop their Humanitarian Implementation Plans (HIPs) DG ECHO relied on a range of global assessment tools, the Index for Risk Management (INFORM) and the Forgotten Crisis Assessment (FCA)[16] and the Integrated Analysis Framework (IAF). According to INFORM Between 2017 and 2019 both **Myanmar** and **Bangladesh** were considered as high-risk countries. DG ECHO and their partners contributed to various needs interagency assessment exercises that contributed to successive JRPs in **Bangladesh**[17] and HRPs in **Myanmar** that covered vulnerable Rohingya communities.

To address the needs of the most vulnerable, including the undernourished, elderly and people with disabilities, DG ECHO progressively moved from blanket multi-sectoral assistance to help meet basic needs in food security, nutrition, health at the beginning of the crisis to a progressively more targeted approach still based on these three sectors but with an increased focus on underserved and more vulnerable populations. DG ECHO's continued support to DRR interventions in Cox's Bazar and Rakhine State helped to increase resilience.

Targeting of vulnerable groups was facilitated by DG ECHO's promotion of AAP, notably in **Bangladesh**, while prioritizing support to interventions, such as nutrition and GBV, that specifically targeted vulnerabilities. As shown in Table 2 below, protection was incorporated in a high proportion of DG ECHO projects in the sample. This focus on protection, combined with a multi-sectoral approach for camp populations and surrounding communities helped ensure that DG ECHO was able to maintain an updated assessment of vulnerability. Assessment and monitoring data not only guided DG ECHO's assistance and advocacy but also helped increase coverage since this data was regularly shared with other donors and humanitarian agencies through formal and informal coordination systems. This approach was more successful in **Bangladesh** than in **Myanmar** where partners experienced more challenges in collecting disaggregated data due to a combination of limited access, government restrictions on data collection and lack of identity documents.

Table 2– Integration of protection and environment (project sample)

Country	Protection			Environment
	Targeted	Integrated	Total	
Myanmar	25%	44%	69%	22%
Bangladesh	25%	19%	44%	4%

Source: DG ECHO partner reports from the project sample

DG ECHO and their partners were able to assess vulnerability more accurately in **Bangladesh** than in **Myanmar** due to limited access and restrictions imposed by the government on data collection. Assessments and post-distribution monitoring (PDM) informed Nutrition, Health, Protection, and WASH activity interventions that prioritised needs of the most vulnerable gender and age groups, in particular women, girls, children,

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[15] Sida L. and Schenkenberg, E. (2019), Synthesis of Rohingya Response Evaluations of IOM, UNICEF and UNHCR.
[16] The Rohingya refugee crisis in **Bangladesh** and the Inter-ethnic (Kachin) conflict in **Myanmar** were identified in ECHO's Forgotten Crisis Assessment during 2010 until 2017.
[17] As of June 2020, 109 different assessments were found for the Rohingya crisis in **Bangladesh** published on Reliefweb.

the elderly and disabled. Protocols for the elderly and persons with disabilities (PWD), classified as extremely vulnerable individuals (EVIs) were integrated into procedures for distributions of food and NFI and taken into account within the WASH and Shelter community-based activities. There was also a shift of focus by DG ECHO and other protection actors to also addressing GBV through Engaging Men in Accountable Practices (EMAP) approaches.

The integration of gender and protection- mainstreaming analysis into project design led to the identification of measures aimed at preventing or mitigating damaging coping mechanisms as well as improving the assistance provided, including adopting measures so that women could carry food items home safely in **Bangladesh**. DG ECHO also supported the construction of accessible and gender-appropriate toilets, education centers, sanitation facilities and clinics in some of the camps.

GBV survivors were reluctant to discuss the problems they faced with domestic violence, which many considered as culturally 'normal'. GBV against men and boys was usually not discussed. Psychosocial aid for women was often only given with permission of the husband. GBV survivors in need of medical assistance were often detected too late (when they were found) to apply the 72-hours reaction time for SRH treatment. Another key challenge for GBV treatment has been the high dropout rate from the case management process.

To mitigate such challenges, partners in both countries used outreach teams of community workers and local volunteers, as well as safe places where those who attended (family permission was required for women and girls, participation of men and boys was limited) could be consulted about their needs.

Population movements into **Bangladesh** decreased towards the end of 2017 and during 2018-2019 the response became relatively more settled and orderly, although movements did not cease completely.[18] DG ECHO and their partners were able to transition from a focus on lifesaving interventions to more specific targeting of the most vulnerable in camps including to host communities.[19] CCCM clusters in both countries compiled disaggregated data that helped DG ECHO partners and other agencies to better target relevant vulnerable beneficiaries.[20]

Economic insecurity, caused in large part by persistent discrimination, exclusion and human rights abuses, was a key cause of vulnerability for displaced Rohingya in both Rakhine State[21] and in **Bangladesh**.[22] DG ECHO consistently advocated for and supported increased cash programming based on their own policy priorities and various assessments, such as in **Bangladesh** where half of camp populations surveyed preferred cash-based assistance with the remainder preferring a combination of cash and in-kind assistance.[23] Several studies highlighted inefficiencies of in-kind aid being resold to generate cash in addition to resorting to negative coping strategies to generate cash income.[24] CVA interventions, especially unconditional cash transfers, were limited by a number of factors, including government resistance in **Bangladesh** to most types of cash transfers to the Rohingya population and constraints related to access, conflict, market conditions and freedom of movement in **Myanmar**. There has nevertheless been a positive shift towards CVA in both countries and, as of mid-2020, WFP reported that 70% of the camp population in **Bangladesh** was receiving e-vouchers which were used to purchase 20 items from WFP-managed retail outlets, with an objective to complete all camps by end of 2020).

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18 2019 JRP for Rohingya Humanitarian Crisis: January - December
19 The 2nd, 3rd and 4th Modifications to the 2017 HIPs enabled ECHO to support immediate emergency needs as the Rohingya refugees crossed into **Bangladesh**.
20 Based on the project sample, by 2019 most partners had oriented their support to take into account gender, age and PWD and exclusion was no longer being reported.
21 Mercy Corps (2019), Cash and Voucher Feasibility Study, Rakhine State, **Myanmar**, October 2019.
22 WFP Bangladesh (2017) Rohingya Emergency Vulnerability Assessment – Summary Report
23 UNHCR (2018), Post-Distribution Monitoring Cash-Based Interventions **Bangladesh** Refugee Situation July 2018.
24 See for example ACAPS (2019), Rohingya Influx Overview: Pre-cyclone and monsoon season analysis April 2019.

Community Engagement

Partners made efforts to involve camp residents in both countries in programme implementation, including construction of their shelters, notably in **Bangladesh**. Interviewees in **Myanmar** noted that staff needed additional skills and a longer-term approach to help face the challenges of working with populations that are used to camp services being provided by someone else, such as cleaning latrines, etc. In Bangladesh, it took a sustained effort by partners to encourage use of safe spaces and set up functioning referral pathways for GBV survivors.

Affected populations were consulted by DG ECHO staff and partners where conditions allowed. Due to access constraints and restrictions on surveys in **Myanmar**, partners increasingly relied on local actors, remote monitoring and information gathered during site visits or remote monitoring relayed by national staff living in the camps who were themselves IDPs. In both countries, government reservations about the agendas of Rohingya civil society organisations (CSO) limited their ability to participate in humanitarian efforts. CSOs have nevertheless increased their involvement during the scoping period, notably in **Myanmar** where they have been able to deliver assistance in conflict-affected areas where humanitarian agencies have experienced difficulties in access.

Beneficiary inputs were collected during partner assessments, feedback through health centres, help desks and friendly spaces and via NGO feedback mechanisms in camps. In **Bangladesh**, DG ECHO supported translation services into the Rohingya language, to ensure that the language and cultural identity of displaced populations was respected for material relevant to its interventions. Its partner BBC Media Action organised Rohingya language radio programmes so as to keep the camp inhabitants informed and published a series of consolidated surveys based on feedback from camp populations and tracking how these changed over time.[25]

Most DG ECHO partners maintained their own beneficiary complaints and feedback mechanisms (CFM) in the camps which helped to inform assessments.[26] CFM tended to be less effective in **Myanmar** due to political sensitivities, insecurity and limited access to telecommunications. Interviews with community members indicated that feedback from CFM did not necessarily result in changes, a finding confirmed by BBC Media Action's research supported by DG ECHO in the camps in **Bangladesh**.[27] Surveys and monitoring found that communities did not necessarily feel that their views were adequately considered during decision-making which has had implications for effectiveness, including cost-effectiveness as described in DG ECHO's partnership guidelines.[28]

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[25] BBC Media Action (2019), What contribution is the Common Service making to community engagement and accountability in the Rohingya response? And BBC Media Action (2017), Research Report – Evaluation of the Common Service.

[26] Bailey N., Mahmuda Hoque, Michie, K., Fuad Ur Rabbi (2018), How Effective is Communication in the Rohingya Refugee Response? An Evaluation of The Common Service for Community Engagement and Accountability. BBC Media Action.

[27] BBC Media Action (2019), What contribution is the Common Service making to community engagement and accountability in the Rohingya response?

[28] See DG ECHO (2014), Framework Partnership Agreement 2014 Guidelines: Section 12.2.1.

EQ2 Strategies adapted to context

EQ 2	To what extent was a clear and context-adapted strategy established and applied to address the crisis? To what extent were DG ECHO and its partners successful in adapting and adjusting their approach as the needs evolved over time in the different contexts of the crisis?

Summary Response to EQ 2

- DG ECHO's annual programming cycle was well-suited to the dynamic operating environments to meet lifesaving needs during the response, with sectoral priorities highlighted in an annual HIP and periodic HIP updates adapted to changes in the operational context. DG ECHO opted for providing funding to multiple sectors *via* their annual programming cycle.

- This allowed DG ECHO to adapt its interventions to constantly changing operating contexts in both countries. Allocating funding to multiple sectors allowed to maintain a multisectoral perspective of the response. This perspective gave DG ECHO an in-depth understanding of the context and needs as the crisis evolved. This understanding not only guided prioritisation for DG ECHO's own funding, filling gaps and complementing interventions of other donors (e.g. in Teknaf Upazila in southern **Bangladesh**), but it also gave the opportunity to DG ECHO to influence the spending patterns of other donors.

- DG ECHO promoted integration of gender and protection approaches to better address vulnerability. DG ECHO also continued to support DRR interventions to not only help increase the resilience of populations living in disaster-prone areas, but also as a means of promoting cohesion amongst displaced populations and surrounding communities.

- As the crisis has transitioned into a protracted emergency, the EU's medium- to long-term strategies in both countries have promoted more sustainable solutions for displaced and surrounding communities while continuing DG ECHO's focus on life-saving interventions prioritising the most vulnerable to build resilience.

DG ECHO's Response Strategy

DG ECHO's annual programming cycle was well-suited to the dynamic operating environments to meet lifesaving needs during the response period. Indeed, sector priorities were highlighted in annual HIPs. These were periodically revised and updated in order to accommodate sudden changes in the operating environment and available funding, such as increased funding for food security interventions in both countries during 2018 to address unmet needs.[29] DG ECHO was accordingly viewed by their partners as a flexible donor, able to shift funding within programme proposals or respond appropriately to new crises, including for unanticipated events including the response to the COVID-19 crisis during 2020.

DG ECHO's sectoral priorities were described in the annual HIPs for the region. As shown in Figure 9 below DG ECHO spread their funding in **Bangladesh** and **Myanmar** to cover food assistance, nutrition, health and protection activities. Given the relatively high incidence of GBV amongst displaced Rohingya[30] and the expected demand for services and needs for pregnant and lactating women, DG ECHO placed an emphasis on sexual and reproductive health (SRH). Allocating funding between different lifesaving sectors

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[29] DG ECHO (2018), Humanitarian Implementation Plan (HIP) - South and East Asian and the Pacific, 2018, Version 7.
[30] Human Rights Council (2019) Sexual and gender-based violence in Myanmar and the gendered impact of its ethnic conflicts. Forty second session. 9–27 September 2019.

allowed DG ECHO to adapt its interventions by maintaining an overall perspective of priority humanitarian needs. Encouraging a focus on gender and protection in the camps helped in targeting the most vulnerable, supporting increased DRR resilience, and promoting cohesion for both host and displaced communities. Gender and protection were increasingly prioritised and mainstreamed over time, which helped address gaps identified by DG ECHO and in interagency assessments and Real Time Evaluations.[31]

Figure 9 – Sectoral allocation of DG ECHO funding (2017-2019)[32]
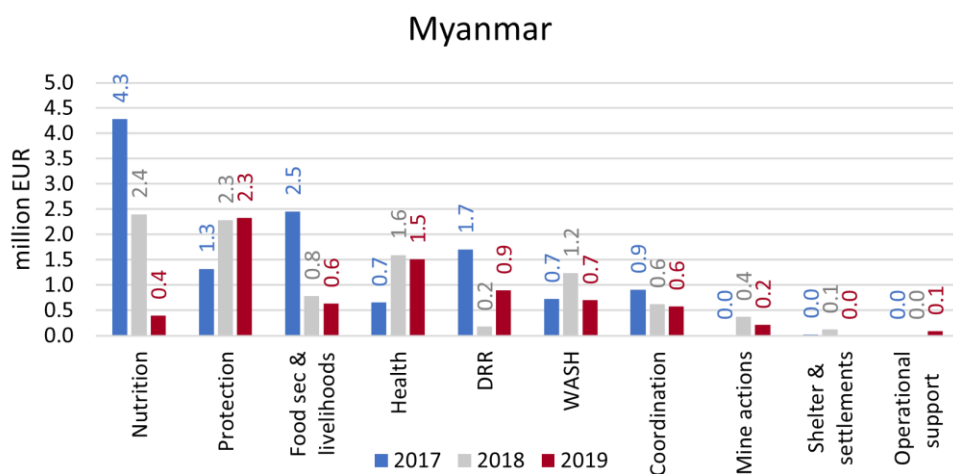
Source : ADE's calculation based on ECHO database (Dashboard)
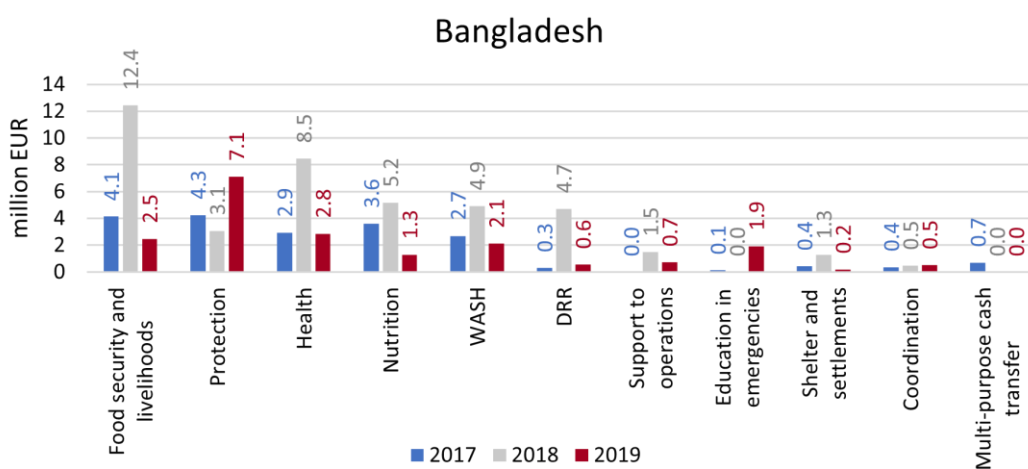
Source : ADE's calculation based on ECHO database (Dashboard)

Successive HIPs promoted use of CVA approaches in both countries. Although DG ECHO was a strong voice in advocating a move to CVA, in practice the scope for CVA was limited by various constraints, notably restrictions on freedom of movement in **Myanmar** and government opposition to cash transfers to refugees in **Bangladesh**. DG ECHO has supported WFP's transfer to a voucher-based approach for food distributions, in addition to advancing the CVA agenda apart from supporting partner initiatives such as WFP's efforts to expand their e-voucher programme to cover more sectors.[33]

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[31] See, for example, HERE (2018), Real-Time Response Review of the Disasters Emergency Committee (DEC) Emergency Appeal for People Fleeing **Myanmar**: Responding to The Needs of Refugees and Host Communities - Review of the DEC Phase 1 Responses March 2018.

[32] Note that funding to protection also included EiE activities.

[33] For example, for WASH and Shelter interventions.

DG ECHO had also been supporting DRR and resilience interventions in both countries for many years prior to the 2017 Rohingya crisis, including preparedness for cyclones, floods and disease outbreaks which are recurring hazards. Over-crowding in fragile environments, services that do not meet standards, and constraints on freedom of movement and insecurity which have eroded resilience have meant that partners have had to integrate DRR within their interventions.[34] DRR planning has been an integral component of the HIPs to help address the significant disaster risk vulnerability of refugee camps[35] and surrounding communities. DG ECHO also funded WFP and IOM to undertake DRR activities in the camps, focusing on camp maintenance, including preventing landslides in **Bangladesh**, and preparations for disease outbreaks (cholera in **Bangladesh**, and COVID19) as well as providing some cash for work opportunities, promoting social cohesion between communities and reinforcing preparedness for major disasters such as cyclones.

It was evident to DG ECHO and other donors that a large-scale and dignified voluntary repatriation to **Myanmar** was unlikely in the foreseeable future due to various factors, not least the reluctance of the Rohingya themselves to return without guarantees regarding their safety, security and basic rights. As described in more detail below under EQ6 (Nexus planning) and EQ11 (Sustainability) sections, DG ECHO and other donors experienced challenges in supporting more sustainable solutions due to the restrictive policy environments in both countries. At the same time there was a clear need to move to more sustainable and dignified solutions in both countries for displaced populations caught up in this protracted crisis. An indicator of this emerged from analysis of DG ECHO's project portfolio for the Rohingya crisis, since some 70% (51 out of 75) of projects funded during 2017-2019 were follow-on projects from the previous year, updated to the changing context where appropriate.

DG ECHO's medium- to long-term strategy has been to contribute to the EU's multi-year Nexus action plan for the Rohingya crisis through combining life-saving interventions with activities to build resilience while advocating more sustainable solutions. DG ECHO's role in the multi-year is described as "*In line with the nexus approach, the programme is designed taking into consideration and building upon the ongoing EU support provided by ECHO on humanitarian assistance, focusing on emergency multi-sectoral needs...*"[36]

This mirrors findings from studies of other protracted emergencies. One example is a 2017 OCHA study that found that humanitarian "strategies" "*…tended to act more as aggregators of multiple actors' individual contextual analysis and response plans*",[37] whereas a multi-year strategy requires an analysis which differentiates root causes from short-term needs that specifically considers needs in phases: short-, medium- and long-term adapted to the specific context that sets out a vision for moving beyond the crisis.[38] As described in the Case Study 2 in the annex, other major donors, including EU Member States and humanitarian agencies such as UNHCR[39] and many DG ECHO partners, have been basing their programmes on multi-year strategies. DG ECHO thus appeared to be an outlier amongst humanitarian donors as one of the few agencies not developing multi-year strategies for this protracted emergency.

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[34] A description of approaches used by DG ECHO partners can be seen in the 2019 HRP for Myanmar and the 2019 JRP for Bangladesh.

[35] This was particularly the case in Bangladesh, where the government has not permitted the construction of cyclone shelters in the camps.

[36] European Union (2020), Action Document for "Responding to the needs of the Rohingya population in Cox's Bazar, Rakhine State and host communities in Bangladesh": Annual Programme. Page 11.

[37] OCHA (2017) Evaluation of Multi-year Planning. February 2017. Page 9.

[38] Ibid.

[39] Steets, J. *et al.* (2019) UNHCR's Engagement in Humanitarian-Development Cooperation.

EQ3 Proportionality of Funding

EQ 3	Was the size of the EU budget allocated to the Rohingya crisis proportionate to the needs that DG ECHO intended to address?

Summary Response to EQ 3
• The budget allocated to the Rohingya crisis was not sufficient to meet the needs that DG ECHO intended to address, especially in **Bangladesh** during the early phases of the crisis. This resulted in limiting the scale of DG ECHO's response in areas identified as priorities in HIPs. • DG ECHO nevertheless played a significant role in the response to the Rohingya refugee crisis. Although not at the scale that field staff anticipated, DG ECHO still contributed significant funding to the response plans in both countries. DG ECHO allocated the available funding proportionally to the sectoral needs identified and adapting to the changing context, with certain exceptions including the limited scope for cash-based interventions for displaced populations and support to more sustainable interventions due to restrictive policy environments in both countries. • DG ECHO's positioning in both countries as a trusted source of information and analysis helped to inform needs assessments of other donors, which helped to improve coverage of priority needs.

When examining the extent to which budgets were proportionate to the needs DG ECHO's plan to address the size of the budget, the timeliness of funding decisions, DG ECHO's role as one of the larger donors to the response and the extent to which the sectoral allocation of funding was in line with the identified priorities.

Budget Size

Overall, DG ECHO's allocated around EUR 111 million to the Rohingya refugee crisis in Bangladesh and Myanmar between 2017 and 2019, and 74% of this budget (EUR 82 million) was allocated to Bangladesh (see Section 1.3 for more details about DG ECHO's funding). DG ECHO needs assessment aims at prioritising the needs, allocate funding and develop the HIPs. It was based on the Index for Risk Management (INFORM) and the Forgotten Crisis Assessment (FCA), while the Integrated analysis frameworks (IAFs) provided an in-depth qualitative assessment at the crisis level.

The budget allocated to the Rohingya crisis did not correspond to the needs identified by DG ECHO. The funding allocated by DG ECHO in both countries was generally below the budget requested based on Integrated Analysis Frameworks (IAFs). For example, In **Myanmar**, the IAFs suggested allocating more than twice the funds actually allocated in 2019 (i.e. EUR 17 million vs. EUR 7.4 million). In Bangladesh for 2019, the IAF requested around EUR 60 million, around three times more than the actual funding received. [40]

The limited budget had a number of concrete consequences. Firstly, some projects were not selected due to lack of funding, even though they addressed priorities in the HIPs.[41] For some other projects, funding limitations led to a reduced scope.[42] Some alternative solutions

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[40] DG ECHO Integrated Analysis Frameworks (IAFs) 2016-2019 for Bangladesh and Myanmar. No specific amount was requested in the 2018 IAFs.

[41] Examples of rejected proposals in **Bangladesh** during 2018 covering Protection, MPHSS, Health; Protection, WASH and Food security; and WASH and Food security & Livelihood). In **Myanmar** too, interventions (in Education in emergencies and Shelter) were flagged for funding in case additional funding would be made available.

[42] For example, result 2 was dropped from the 2018 WFP intervention in **Myanmar**.

were found. One example was when DG ECHO encouraged other donors to fund Save the Children projects in **Myanmar** to complete activities that were already underway.

There are signs that the Rohingya crisis was not initially recognised as a priority by DG ECHO HQ. Prior to the massive influx of Rohingya refugees in Bangladesh in August 2017, DG ECHO funding in **Bangladesh** and **Myanmar** showed continuous decline.[43] Despite the risks identified for the refugee population after an influx into **Bangladesh** in October 2016, the initial budget allocated to **Bangladesh** for 2017 (EUR 12.7 million) was not increased. A DG ECHO mission to **Bangladesh** in March 2017 found that DG ECHO operations were underfunded but the team did not find evidence that this led to increased prioritisation at a global level.[44] During 2020, the COVID-19 pandemic was also seen to exacerbate the needs of the Rohingya and host-communities in both countries while making the interventions less cost-effective.[45]

DG ECHO has been a significant contributor to the response plans in Bangladesh and Myanmar. According to FTS data, DG ECHO was the third biggest contributor to the **Myanmar** HRP with a total contribution of around EUR 29 million during 2017-2019, corresponding to 6.1% of the HRP. In **Bangladesh**, DG ECHO was the 5th biggest donor to the Joint Response Plans (JRPs) for the 2017-2019 period. With a total contribution of around EUR 66 million it contributed to 4% of the total appeal over the 3 years. The USA was by far the largest contributor in both countries, providing 20.5% of the HRP requirements in Myanmar and 24.9% of the JRP requirements in Bangladesh.

However, DG ECHO's contribution is relatively small in comparison to some EU member states, especially when humanitarian interventions that are outside of the Response Plans in each country are considered. In **Myanmar**, Germany and Denmark contributed to respectively 6.7% and 5.2% of the HRP in comparison to 6.1% for DG ECHO. Moreover, Germany provided around EUR 19 million outside of the HRP in 2017. The UK committed GBP 108.5 million to the Humanitarian Assistance and Resilience Programme Facility (HARP) for 5-years starting from 2018.[46] In **Bangladesh**, the UK (which was still a EU member state during the scoping period of the evaluation) contributed 15% of the JRP against 4% for DG ECHO.

The lack of information on how the budgets were decided made it difficult to assess the extent to which the available budget was commensurate to DG ECHO expected outcomes. DG ECHO funding for **Myanmar** and **Bangladesh** allowed DG ECHO to "*contribute to address the most acute humanitarian needs*", in line with overall objectives in the HIPs. This being said, as described under EQ2 above, the objectives at strategic level in the IAFs and HIPs were only described in broad terms. At a project level, however, outcome objectives are clearly defined and were found to be aligned with budgets. Although in some cases, some activities could not be completed due to the lack of funding, in general the project documentation does not indicate that the lack of budget was considered as an obstacle.

Phasing of funding decisions

Overall, DG ECHO provided a timely response to the crisis and changing needs, despite a gradual increase in the budget. The HIPs were modified multiple times to secure additional allocations in response to the changing needs due to the influx of new refugees, and natural disasters that affected the two countries. DG ECHO's early establishment of a presence in Cox's Bazar allowed them to react quickly to the massive influx of Rohingya refugees in Bangladesh at the end of August 2017. In two weeks (i.e. mid-September 2017), DG ECHO

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[43] According to the relevant IAFs, ECHO funding decreased from EUR 21.9 million in 2012 to EUR 11.2 million in 2016 in **Bangladesh** and from EUR 21.3 million in 2013 to 14.7 million in 2016 in **Myanmar**.

[44] DG ECHO (2017), Ad Hoc / Mission Report. 25-31 March 2017.

[45] DG ECHO (2020), HIP – South and South-East Asia, Version 4 – 12/10/2020.

[46] DG ECHO's contribution to the response plans as recorded in the FTS data does not match perfectly the funding recorded in the HOPE database, which is regarded as the most precise source of information. The amounts are provided here for comparison with other donors. Moreover, the funding is recorded in USD, corresponding to USD 33 million for Myanmar and USD 75.8 million for Bangladesh over the 2017-2019 period.

provided an additional EUR 3 million, followed by EUR 5 million a month later and another EUR 4.6 million in mid-December 2017.[47] Additional funding was mainly used for operations in **Bangladesh** due to the scale of need and restricted access in **Myanmar**.[48]

Despite the scale of the influx into **Bangladesh**, funding was only gradually scaled up.[49] Successive HIP revisions were of limited scale in comparison to the needs (e.g. EUR 3 million for food nutrition, health, shelter and WASH assistance when 380,000 Rohingya refugees crossed the border). Moreover, it took 6 months (March 2018) to mobilise EUR 25 million from the Emergency Aid Reserve (EAR), although its purpose was to provide timely funding for humanitarian crisis. This was in part due to the time needed for DG ECHO to assess and select partners, many of which had just arrived in Cox's Bazar. Since DG ECHO was the first donor to establish an office in Cox's Bazar more timely funding decisions could have contributed to a more coherent planning.[50] In **Myanmar**, difficulties in accessing affected populations and, for DG ECHO's partners, obtaining the necessary permits to operate severely limited the capacity to absorb funds, especially during the latter part of 2017.

Allocation of funds by sector

DG ECHO's funding was allocated in line with the priorities identified in the successive HIPs in both countries based on needs assessment and Global Appeals (See EQ2 for more details). DG ECHO also highlighted the crucial needs for coordination, advocacy, and the strategic role of DRR.

DG ECHO's budget in **Bangladesh** was allocated by DG ECHO based on their understanding of the needs in such emergency phases. As shown in Figure 8 above, between 2017 and 2019, "Food security and livelihoods" received 23% of the funding, followed by "protection" with 18%, health (17%), nutrition (12%) and WASH (12%). Shelter was identified as a priority sector, but this sector was mainly integrated within protection and DRR activities, with only 2% of the budget being allocated specifically to shelter. As needs evolved, food security and nutrition (accounting for more than 40% of DG ECHO's budget) and health (20%) were prioritised in 2018 but receive less funding in 2019. The share of funding to protection and education in emergencies (EiE) activities increased substantially in 2019.

In **Myanmar**, almost a quarter of total funding was allocated to nutrition between 2017 and 2019, 21% to protection, 13% to food security and livelihoods and 13% to health, 10% to DRR, 9% to WASH and 7% to coordination. In line with evolving needs, nutrition and food security received a large share of funding early on (56% in 2017) but decreasing over time (14% in 2019). The share of funding allocated to protection (11% in 2017) and health (5%) was limited in 2017 but increased over time (respectively 32% and 20% in 2019).

DG ECHO prioritised its funding to interventions covering the "most urgent needs" (e.g. for example rejecting interventions covering "medium term food security and nutrition strategies" to the benefit of "urgent food security and life-threatening nutritional needs"). The exceptions to this approach were often due to restrictive policy environments in both countries which, for example, limited scope for cash-based interventions for displaced populations in **Bangladesh** and support to more sustainable intervention options in both countries.

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[47]   Corresponding to the second, third and fourth modifications of the HIP 2017.
[48]   ACF Assessment Sept 2017 (Annex 11 of ECHO single form application): "90% of arrivals were staying in the open air and had not eaten for two days, and less than 25% of the new arrival have access to sanitary latrine and washrooms, and around 50% of new arrivals do not have safe and easy access to safe water. The nutrition status of the Rohingya community in Rakhine was already very poor and only worsened when crossing into **Bangladesh**.".
[49]   The second modification of the 2017 HIP referred to 380,000 people crossing the border and a need for food nutrition, health, shelter and WASH assistance. An additional EUR 3 million was then provided for these sectors (EUR 7.90/person). Further allocations were made in October and December 2019 of EUR 5 million and EUR 4.6 million following the arrival of 200,000 (EUR 25/person) and 146,000 refugees (EUR 31.50 EUR/person) respectively.
[50]   DG ECHO Integrated Analysis Frameworks (IAFs) 2016-2019 for **Bangladesh** and **Myanmar**.

DG ECHO's budget allocations considered the actions of other donors

DG ECHO's good understanding of unmet needs contribute to the quality of their response to the crisis. Using the JRP in **Bangladesh** and the HRP in **Myanmar** as a key reference, DG ECHO relied on a stakeholder mapping in the IAFs that considered assistance from national and international humanitarian actors to prioritise funding to underserved geographic areas and sectors. Examples from **Bangladesh** include a decision in 2017 to allocate EUR 1 million to education, a sector which was not initially prioritised by other donors, to support the Education Cluster to elaborate a strategy to address the education and protection needs of the Rohingya in the camps.[51] The decision to focus on interventions in Teknaf and Leda Camp, which received less attention from international donors, is another example.

DG ECHO also favoured the complementarity to other donors' activities when selecting projects (see EQ10 for more details). For example, DG ECHO often requested the potential partners to adjust their proposals to avoid overlapping with other activities and make sure the approach was aligned with the lead institution in the sector.

EQ4 Alignment with policies and principles

EQ 4	To what extent was DG ECHO's response aligned with: a) humanitarian principles, and b) DG ECHO's relevant thematic/sector policies?

Summary Response to EQ 4
• DG ECHO's strategies and approaches in both countries were largely aligned with relevant policy frameworks and thematic/sector policies, notably in incentivising partners to design and implement their interventions using a needs-based approach which as far as possible integrated protection, gender and vulnerability considerations so as to be consistent with humanitarian principles.   • A review of relevant documents and interviews with partners receiving DG ECHO funding demonstrated a reasonable awareness of humanitarian principles and relevant thematic policies among DG ECHO partners in both countries. This was particularly apparent with gender and protection. DG ECHO's response was generally consistent with its Grand Bargain commitments although the response was influenced by issues related to localisation, where DG ECHO has relatively little policy guidance at a global level.   • DG ECHO's emphasis on adherence to humanitarian principles helped to ensure that the principles were a primary consideration for ECHO partners when prioritising interventions and during inter-agency discussions. Some stakeholders nevertheless felt that this hard-line principled approach at times provoked reactions that impeded practical solutions for meeting needs of vulnerable groups. This was particularly evident in **Myanmar** due to the challenges agencies constantly faced in obtaining the necessary permits to access affected populations.

Alignment with humanitarian principles

DG ECHO supported EU Delegations in each country in respecting their commitment to uphold and promote fundamental humanitarian principles of humanity, neutrality, impartiality and independence and its ability to operate in complex political and security

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[51] DG ECHO (2017), IAF- 2017: **Bangladesh**, p.6.

contexts (§10), advocate strongly and consistently for the respect of International Law including International Humanitarian Law, Human Rights Law and Refugee Law (§ 16).[52] DG ECHO also ensured that interventions they were supporting had a strong focus on a gender dimension in humanitarian aid (§ 24) and related protection aspects (§ 39) which were anchored in the policy framework.[53]

DG ECHO was widely acknowledged by stakeholders as a donor whose interventions and advocacy were guided by needs and humanitarian principles. DG ECHO consistently promoted needs-based approaches and integration of protection concerns into interventions based on humanitarian principles and informed by risk assessments.[54] Interviews with partners and other stakeholders indicated that DG ECHO has been more successful in promoting humanitarian principles with NGOs and UN agencies than with national Governments. This was not unique to DG ECHO, however. Humanitarian agencies have faced challenges in advocating with the two governments to respect humanitarian principles even prior to the 2017 crisis.[55]

While DG ECHO's promotion of humanitarian principles was overall appreciated by the international humanitarian communities in both countries, some interviewees noted that this occasionally had the effect of transforming different interagency coordination fora into an advocacy platform for human rights. They explained they considered this a diversion from the primary task of finding practical solutions to meeting humanitarian needs of vulnerable groups affected by the crisis. This was particularly evident in **Myanmar** due to the challenges in getting the necessary permits to operate and access affected populations.

Alignment with relevant DG ECHO thematic policies

A review of HIPs during 2017-2019 and other relevant documents[56] confirmed that DG ECHO's strategies in both countries had been aligned with relevant policy frameworks on humanitarian aid, grounded in the Council Regulation (EC) No 1257/96 of 1996 and in the joint statement by the Council of Representative of the Governments of the Member States, the European Parliament and the European Commission.[57]

DG ECHO's thematic policies and guidelines provided operational implementation and coordination aspects including entry and exit criteria for operations. Senior DG ECHO partner staff interviewed in both countries demonstrated a reasonable awareness of relevant thematic policies, including those relating to health, mental health in emergencies, nutrition, gender-age marker and protection. Some partners were implementing with local partners, and during interviews it was evident that there was less familiarity with DG ECHO thematic policies amongst this stakeholder group. There was no evidence that this lack of awareness had an adverse effect on alignment, which could be attributed to appropriate guidance and monitoring by the DG ECHO partner. Other related interagency policies aligned with DG ECHO policies, including the Protection Policy of the Inter-Agency Steering Committee (IASC), interagency GBV Case Management guidelines, Integrated Community Case management, Child Protection and Child Safeguarding policy procurement policies were widely applied.

DG ECHO partners in **Bangladesh** helped to increase overall awareness of GBV but faced challenges to improve services, including ensuring adequate standards of care since medical staff are obliged to leave the camp by 5:00 PM. Rohingya staff were working as volunteers, but many lacked the necessary technical training. Cultural aspects posed

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[52] European Union (2019), Humanitarian Aid Regulation v. 26/07/2019.
[53] European Union: Joint Statement by the Council and the Representatives of the Governments of the Member States meeting within the Council, the European Parliament and the European Commission (2008/C25/01).
[54] 2018-2020 HIPs, interviews with partners and other stakeholders.
[55] IRIN News (2013), **Myanmar**'s Rakhine State – where aid can do harm. 3rd July 2013. The New Humanitarian.
[56] See, for example, European Union (2020), Action Document for "Responding to the needs of the Rohingya population in Cox's Bazar, Rakhine State and host communities in Bangladesh": Annual Programme.
[57] European Union (2008): Council Regulation (EC) No 1257/96 of 20 June 1996 concerning humanitarian aid. Official Journal of the European Union, L163/1.

additional barriers, since Rohingya women often did not wish to deliver in health facilities and GBV survivors hesitated to go to hospitals for medical emergency interventions.

All partners interviewed were able to provide examples of how they had integrated gender and GBV issues into their project designs. Examples included mainstreaming of gender considerations into aid distributions, community outreach using mobile teams and centres where men and boys were included in awareness activities. Safe places for women and girls were adapted to the type of intervention, including confidential centres for GBV psychosocial counselling and family planning and health Sexual and Reproductive Health and Rights (SRHR) centres.

Grand Bargain commitments on localisation

DG ECHO's Grand Bargain commitments were integrated into HIPs although localisation approaches, capacity building and implementation although commitments to local partners were described only in general terms. [58]   The overall Rohingya response has been significantly influenced by issues related to localisation in different ways in each country. In **Bangladesh** DG ECHO[59] and other donors have, along with UN and NGO community, have engaged on localisation as one of the elements of the Grand Bargain commitments.[60] In **Myanmar**, capacities of civil society organisations in Rakhine State were relatively limited, although international agencies have come increasingly to be depended upon for delivering humanitarian aid, due to the difficulties of accessing affected communities.

EQ5 Coordination with other donors

EQ 5	To what extent was DG ECHO successful in coordinating its response with that of other donors, including EU Member States, and by that avoiding overlaps and ensuring complementarities?

Summary Response to EQ 5
• DG ECHO played an important coordination role with humanitarian donors in both countries. It was perceived by its partners in both countries as an informed and constructive donor that encouraged a coordinated approach. It also played an informal facilitation and supporting role for UN-led coordination which was needed given the "non-traditional" international coordination structures authorised by the two governments. • DG ECHO's support for NGO Platforms in both countries helped to ensure there has been a consistent NGO "voice" in interagency coordination fora.

DG ECHO played an important coordination and advisory role for humanitarian donors in both countries. The fact that DG ECHO was already present in the two countries before the crisis and was the first donor to set up offices in Cox's Bazar in **Bangladesh** positioned them well to play such a coordination role**.** Concretely, DG ECHO regularly facilitated or contributed to donor coordination meetings and, where feasible, organised joint field visits. Specialist humanitarian staff of EU Member States were mostly based in their respective capitals so operational coordination was mainly with countries outside the EU, principally

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[58]   DG ECHO has relatively little policy guidance at a global level on localization - see DG ECHO (2020) Grand Bargain in 2019: Annual Self Report – Narrative Summary l.

[59]   Kaamil Ahmed (2018) Local aid groups want more of a say in the Rohingya refugee response. The New Humanitarian. 18 September 2018. "*Major international donors direct the bulk of aid funds through UN agencies or big international groups – and ECHO is no exception. EU rules mean that ECHO is only allowed to directly contract organisations based in Europe, which rules out most local aid groups from the start*."

[60]   In Bangladesh, DG ECHO's efforts to support localisation have been challenged since the localisation agenda has become a heavily politicised and frequently misrepresented issue.

the USA, UK, Australia and Canada, who either had humanitarian specialists in-country or made regular visits from their regional office bases. DG ECHO was also involved with the deployment of EU Civil Protection Mechanism during October 2017 to support a coordination hub camp facility in Cox's Bazar.

A shared challenge faced by DG ECHO in both countries was dealing with the "non-traditional" international coordination structures authorised by the two governments, whereby lead coordination responsibilities for international agencies for the Rohingya response were divided between two different agencies (UNHCR and OCHA) in **Myanmar** and three different entities in **Bangladesh** (UN Resident Coordinator, IOM and UNHCR). Interviewees from international agencies were mostly unhappy with these arrangements, mirroring findings of previous evaluations which found, for example, in **Bangladesh** that "*IOM and UNHCR assumed responsibility for different camps, a decision that did nothing to improve the coordination between the agencies. Indeed, it led to a 'balkanization' of the camps, with different systems for collecting data and different quality of services provided…*"[61] Partner staff described how this had impacted projects supported by DG ECHO, including challenges faced in standardising dignity kits and reducing the overlap of services in camps.

NGO Coordination

DG ECHO's funding and advisory support for NGO Platforms in both countries helped to ensure there has been a consistent NGO "voice" in interagency coordination, including donor coordination. This NGO perspective not only contributed to DG ECHO's assessment, analysis and advocacy, but was also valued by other donors. In **Bangladesh**, however, while the platform was seen as providing a useful NGO perspective, interviewees felt that its functioning had been adversely affected by tensions and competition over donor resources as some national NGO members used the platform to criticise donors for failing to live up to their Grand Bargain commitments on localisation.[62]

Interagency coordination in Bangladesh

DG ECHO's engagement in donor coordination was reported to be constructive, both informally and as a participant in donor forum meetings. DG ECHO was cited by peer donors as making a particular contribution in thematic areas such as Communication with Communities, CVA and during joint responses to cyclone Amphan and the COVID-19 pandemic.

DG ECHO worked with other donors and humanitarian agencies to help improve the functioning of the non-traditional UN-led coordination structures authorised by the government. Interagency coordination was hampered by different factors:

- Newly arrived Rohingya were classified as migrants rather than as refugees, leaving UNHCR with their mandated role only in the camps accommodating some 15,000 registered refugees that had arrived before the 2017 influx.

- As described above, shared coordination by the Strategic Executive Group (UNRC, UNHCR and IOM) added to the complexities in mounting a coherent response. The 2018 UNHCR evaluation[63] attributed the detrimental rivalries between UNHCR and IOM to this non-traditional coordination structure. Overall coordination reportedly improved during 2019, thanks to a clearer division of roles and responsibilities between UNHCR and IOM and much-improved working relationships.

- Tensions within the DG ECHO-supported NGO platform in Cox's Bazar (as described above);

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[61] Sida L. and Schenkenberg E. (2019), Synthesis of Rohingya Response Evaluations of IOM, UNICEF and UNHCR.

[62] Kaamil Ahmed (2018) Local aid groups want more of a say in the Rohingya refugee response. The New Humanitarian. 18 September 2018.

[63] Sida, L., et al. (2018) Independent Evaluation of UNHCR's Emergency Response to the Rohingya Refugees in **Bangladesh**.

- Gaps between interagency working groups in Cox's Bazar and coordination fora in Dhaka; *and*

- Frequent turnover of staff in coordination roles.

DG ECHO's regular engagement with interagency coordination was viewed as playing a constructive role in helping forge links between the different groups and providing constructive inputs.

Interagency coordination in Myanmar

DG ECHO regularly played the role of convenor for Good Humanitarian Donorship meetings to discuss humanitarian issues, joint advocacy actions, missions etc. This was also a forum in which donor representatives discussed planning and implementation of the HRP.

As in Bangladesh, DG ECHO played an informal facilitation and supporting role for UN-led coordination to aid the functioning of complex "non-traditional" coordination structures. In Rakhine OCHA coordinated activities in the area around Sittwe, while UNHCR covered northern Rakhine. This division of responsibilities was reported to be a constant source of tension and this divided coordination structure had a negative impact on DG ECHO partners who had operations in both areas.

DG ECHO devoted a significant amount of time and energy to promoting a common position with peer donors and members of the Humanitarian Country Team (HCT) on the government's camp closure policy,[64] which included a letter of support from DG ECHO's Director-General to Under-Secretary-General Lowcock. DG ECHO cooperated closely with UNHCR in its role as protection lead that resulted in a common position by the HCT on operating principles for camp closure.[65]

EQ6 Nexus coordination

EQ 6	Considering that **Myanmar** was one of the six pilot countries included in the EU Nexus Action Plan, what measures were taken by DG ECHO to coordinate the EU's humanitarian and development actions, and how appropriate were these measures?

In addition to assessing progress in advancing the Nexus approach, this question assesses the extent to which the Nexus approach has helped to identify the potential for sustainable exit strategies. Findings related to the Nexus under this question are also linked with sustainability issues discussed under EQ11. The findings under EQ6 thus focus on the EU Nexus as an approach whereas EQ11 addresses broader sustainability issues.

Summary Response to EQ 6

- The EU Nexus approach is of particular importance in the context of the Rohingya crisis, with the designation of Myanmar as a Nexus pilot country and the exodus of Rohingyas into Bangladesh in 2017. **Myanmar** was designated as one of the EU's six Nexus pilot countries prior to the Rohingya crisis. Since then, DG ECHO HQ provided some technical advice while funds were sourced from the existing DG DEVCO programme in **Myanmar**. The Rohingya crisis in August 2017 provided a catalyst for collaboration within the EU Delegation in **Myanmar** and, since 2019, was a useful approach for developing a joint response plan for both countries.

- DG ECHO staff in both countries regularly participated in Nexus-related discussions and periodically conducted joint missions with their counterparts in the

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[64] Government of the Republic of the Union of **Myanmar** Ministry of Social Welfare, Relief and Resettlement (2019), National Strategy on Resettlement of Internally Displaced Persons (IDPs) and Closure of IDP Camps.

[65] HCT **Myanmar** (2019), Operating Principles for Humanitarian Organizations In Displacement Sites Declared "Closed" by the Government In Central Rakhine: A Position of the **Myanmar** Humanitarian Country Team.

EU Missions. DG ECHO staff were given the opportunity to review relevant proposals and other relevant documents. There have also been EU Nexus workshops for EU Delegation staff facilitated by external technical advisers and, in **Myanmar**, a workshop with NGO partners.

- A challenge faced in both countries was that DG ECHO, DEVCO and EEAS each have different systems, ways of working and lines of command and priorities. In **Myanmar** this was partly addressed by developing a mandatory Standard Operating Procedure (SOP) that included joint hearings, peer reviews and joint operations by DG ECHO, DEVCO and EEAS. The EUR 20 million Nexus Response Mechanism for the Rohingya crisis launched in 2019 was an innovative approach where DG DEVCO, DG ECHO and EEAS jointly designed a Nexus strategy to address the needs of this protracted crisis.

- An example of concrete results in both countries was the shift in EU support to the education sector for displaced communities to a longer-term perspective. Due to the context and the continuing reliance on humanitarian assistance, the potential for exit strategies was nonetheless limited.

- The Nexus approach has provided useful lessons learned for both DG ECHO and EU Delegations more generally. Interviews nevertheless indicated that there was low awareness of the EU approach to the Nexus outside of the EU Mission in both countries.

The EU designated **Myanmar** as one of its six Nexus Pilot Countries with Chad, Iraq, Nigeria, Sudan and Uganda. This was done prior to the 2017 Rohingya crisis, at a time when there was a cautiously optimistic outlook triggered by the democratic transition in **Myanmar**. This outlook changed as the inter-ethnic conflicts intensified, with notably a serious deterioration of the situation in Northern Rakhine. A 2018 global review of the EU's Nexus pilot countries by the VOICE network found that "…*progress has been uneven and considerable work remains before the pilot countries can successfully say they have put the Nexus into action*".[66] Based in interviews with EU staff, it was understood that **Myanmar** was among the pilot countries that had made the most progress.

Following the designation of **Myanmar** as a pilot country, a number of activities were undertaken using existing budgets. Funding for Nexus-related activities was mainly sourced from the 120 million Euro peace fund in DG DEVCO's existing programme. Nexus activities funded prior to the escalation of the conflict in August 2017 focused on social cohesion work by allocating resources for food security and livelihood-related interventions.[67] During 2015-2016 DG DEVCO also took over education programmes in the camps that had previously been funded by DG ECHO both in recognition of the developmental nature of this activity and to compensate for DG ECHO budget shortfalls. A joint DG ECHO-DG DEVCO mission during April 2017[68] to review Nexus activities found mixed results, attributed in large part to restrictions by security forces that limited the impact of livelihood activities.

Key informants involved in developing the Nexus approach cited several challenges, including the fact that DG ECHO, DG DEVCO and EEAS each have different systems, ways of working, lines of command and priorities. DG DEVCO is the second largest development donor in **Myanmar**, whereas DG ECHO and EEAS have relatively small budgets. Proposals developed by technical staff from DG ECHO and DG DEVCO, particularly in **Bangladesh** during early phases of the response in 2017-2018 met resistance from management. Developing a Nexus approach has meant dealing with a highly politicised environment and dynamic operating context. DG DEVCO has provided most of the resources, but their systems have proved not to be sufficiently flexible for the dynamic context since amendments for NGO interventions typically took 6-9 months to finalise. Some innovations

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[66] VOICE (2019), NGO Perspectives on the EU's Humanitarian-Development-Peace Nexus Approach: Exploring the Challenges and Opportunities. Page 23.

[67] Joint ECHO/DEVCO Field Visit in Rakhine State 24-28 April 2017.

[68] Ibid

tried in Rakhine in **Myanmar**, including a project funded through the Livelihoods and Food Security Fund and a third-party monitoring system, were not viewed as particularly successful.

## Applying the EU Nexus approach to the Rohingya crisis

The crisis resulting from the Rohingya exodus in 2017 has made it even more pressing for the EU to apply a Nexus approach in both **Myanmar** and **Bangladesh** to address this complex crisis. In 2018, the EU confirmed its commitment to support the Government of Myanmar in addressing the needs of all communities based on the recommendations of the Advisory Commission on Rakhine State. It underlined the importance of focusing on long-term solutions to the complexity of the situation, involving conflict, segregation and displacement, extreme poverty and vulnerability to natural disasters.[69]

It was evident from interviews that DG ECHO collaboration within the EU Delegations in both countries had made considerable progress since 2017, in large part due to a consensus that the Nexus approach was a suitable mechanism for addressing this politically charged, complex and protracted crisis. DG ECHO staff in both countries regularly participated in Nexus-related discussions with their counterparts in the EU Delegation and were given the opportunity to review proposals and other relevant documents. One result has been that the Nexus approach also gained more traction in Bangladesh, Figure 10 below illustrates the framework that was envisaged.

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[69]   European Commission (2018), Draft Nexus Plan of Action for **Myanmar**. February 2018.

Figure 10 – Nexus approach for Bangladesh[70]
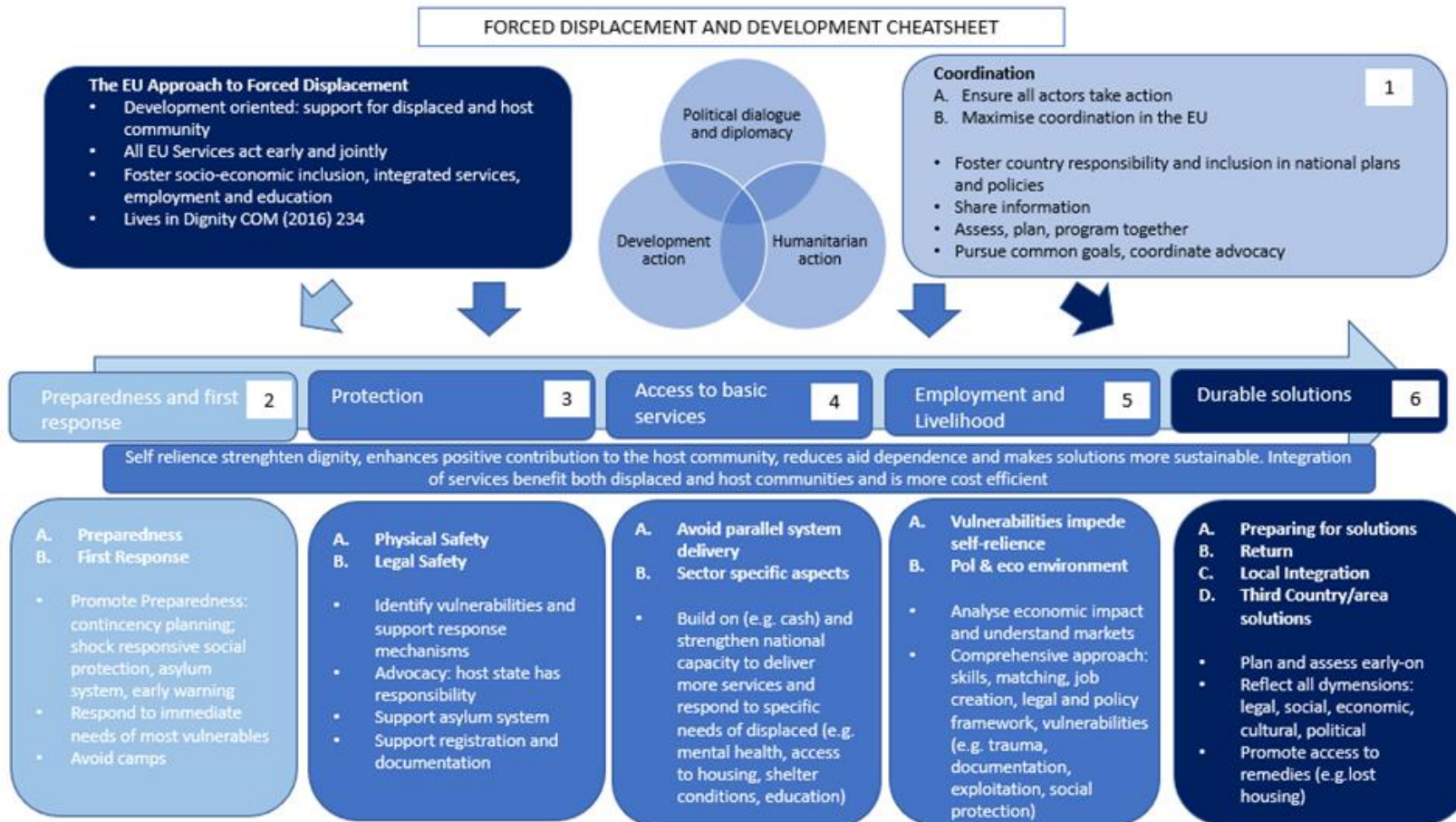
A technical advisor was deployed to **Bangladesh** during 2019 who facilitated a workshop for the EU Delegation in March 2019 with the aim of agreeing on the most relevant priorities to operationalize the EU Nexus approach and draft an action plan.[71] As part of the action plan, another Nexus workshop was to be held during September-October 2019 to take stock of the additional technical analysis and to further advance joint planning. This however did not take place.

The DG DEVCO-funded Nexus approach nevertheless continued to evolve and resulted in development of a joint Nexus action plan for the Rohingya crisis[72] covering both countries. The action plan aimed to address needs of Rohingya refugees and their host communities through an integrated approach to strengthening resilience by focusing on improved access to effective basic services – in education, food and nutrition security, and water, sanitation and hygiene – for both Rohingya refugees and host communities. In order to promote social cohesion and mitigate the risk of conflict it sought to reinforce public systems for structural service delivery to Rohingya refugees and host communities, thereby avoiding protracted humanitarian assistance. The shift to longer-term support by DG DEVCO in both countries to the education sector for displaced communities in camps provided a concrete example of the value-added of a Nexus approach. Due to the context and the continuing reliance on humanitarian assistance, there was nevertheless limited potential for DG ECHO to promote exit strategies.

In 2020 DG DEVCO, DG ECHO and the EEAS agreed on the most relevant priorities to operationalize the EU Nexus approach in **Bangladesh**, including Protection, the broader Nutrition Sensitive Framework and Education-Learning/Transferable Skills Development Opportunities for the forcibly displaced persons and the vulnerable host communities. Moreover, the analysis of the impact of the crises on Cox's Bazar district and related public service delivery systems has been considered.[73]

The Action was designed to complement: (1) ongoing EU development cooperation with **Bangladesh** in the 2014-2020 MIP priority areas of education and human development, and food and nutrition security and sustainable development; and (2) support to UNHCR for assistance to Rohingya refugees in the official camps (EUR 9 million in the 4th phase of the programme running until 2020). It was complementary to EU humanitarian assistance, focusing on emergency multi-sectoral needs with an additional EUR 30 million in addition to the Instrument contributing to Stability and Peace support to registration and identity management (EUR 5 million with UNHCR) and potential support to preventing violent extremism among adolescents.

An important lesson from the **Myanmar** experience has been the challenges in using DG DEVCO funding systems for dynamic conflict-affected environments as a contribution to the Nexus approach. This has led, for example, to the establishment at the end of 2019 of the Nexus Response Mechanism (NRM), a EUR 20 million fund, to provide more flexible support to Nexus activities in **Myanmar**, notably thanks to collegial consultations between DG ECHO, EEAS and DG DEVCO, the introduction of a flexible and adaptive funding approach based on regular assessments and allowing the reallocation of funding to the changing context and "Third Party Monitoring" contributing to independent and regular monitoring and assessments of EU-funded projects.

It also led to a EUR 34 million programme (including EUR 20 million funded by the EU) covering both countries which aimed at strengthening the resilience and social cohesion of Rohingya refugees and host communities in Cox's Bazaar and of IDPs in Rakhine.[74] The

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[71] European Union (2019), Humanitarian-Development-Peace Nexus Approach: Initial Steps of a Strategic Dialogue on the Rohingya Crisis in Bangladesh: Nexus Document Jointly Agreed by DEVCO-ECHO-EEAS - Dhaka, April 2019.

[72] European Union (2018), Building Rohingya refugee and host community resilience in Cox's Bazar CRIS number: MIGR/2018/041-387.

[73] DG ECHO (2020), Humanitarian Implementation Plan (HIP) - South and East Asian and the Pacific, 2019, Version 4, Ref. Ares (2020) 5809937 - 12/10/2020.

[74] European Union (2020), Action Document for "Responding to the needs of the Rohingya population in Cox's Bazar, Rakhine State and host communities in Bangladesh".

action including a small cross-border CSO component implemented by the UNOPS. This initiative aimed to build upon the ongoing EU support provided by DG ECHO in provision of humanitarian assistance and by EU Foreign Policy Instruments contributing to Stability and Peace in support of registration and identity management, prevention of violent extremism among adolescents, and countering online hate speech in Rakhine State through CSOs and local media.[75] It was planned that conflict analysis in both locations involving local CSOs and communities will be the first activity of this component followed by periodic reflections envisaged to update the understanding of the conflict to help navigate risks.

The EU Nexus in the bigger picture

A high-level mission in **Bangladesh** during March 2019 led by OCHA found that a regional strategy was needed and called for a coherent Nexus position on returns in both countries to be agreed upon, endorsed and shared with other like-minded donors in order to put in place a do-no-harm-approach.[76]

There have been ongoing Nexus discussions between the development arms of different donors.[77] Interviews with representatives from other humanitarian donors and DG ECHO partners indicated there was little awareness of the EU's Nexus approach in either country outside of the EU delegations. A notable exception was a workshop[78] hosted by the INGO Forum in **Myanmar** facilitated by VOICE as part of a global initiative early in 2019. This was the first opportunity for NGO partners to gain insights into the EU Nexus pilot. Apart from a VOICE report published following the workshop, there appeared to have been little follow-up and there was little awareness among stakeholders interviewed, apart from EU staff, regarding the planning or objectives of the EU Nexus pilot. Interviews with other donor representatives, including representatives from Member States, similarly indicated relatively low visibility of the EU Nexus planning in both countries. Some interviewees from Member States felt that a more robust engagement by DG ECHO in interagency Nexus processes could be beneficial in order to benefit from their knowledge of the situation on the ground.

EQ7 EU added value

EQ 7	What was the EU added value of DG ECHO's actions in response to the Rohingya refugee crisis in comparison with the EU Member States' actions alone, but also at a more global level in terms of leadership and coordination?

Summary Response to EQ 7
• During the response to the Rohingya crisis DG ECHO has been a key humanitarian actor due to its humanitarian expertise, the strength of its analysis and the fact that it is able to maintain a principled approach without being subject to the same pressures as an individual country. • More specifically, DG ECHO staff were viewed as a valued source of information and analysis by EU Member State representatives from the onset of the crisis, and DG ECHO's informal humanitarian coordination role was appreciated by EU Member State representatives, even if they preferred to fund and manage their own programmes.

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[75]   Ibid.
[76]   DG ECHO (2019), Rohingya crisis cross border mission, Oct. 2019.
[77]   European Union (2020), Lessons learnt from the Humanitarian-Development-Peace Nexus approach. Capacity4dev.
[78]   VOICE (2019), NGO Perspectives on the EU's Humanitarian-Development-Peace Nexus Approach: Exploring the Challenges and Opportunities.

- More broadly, DG ECHO has been a valued source of real-time information and in-depth analysis regarding the situation of the Rohingya. DG ECHO was also seen as a humanitarian agency with a strong advocacy voice which did not shy away from sparking debates related to humanitarian principles, even if the issues at times caused discomfort in such politically sensitive environments.

Different aspects of DG ECHO's value-added have been described in other sections of this report. Feedback from DG ECHO partners, peer donors and other stakeholders interviewed was consistent and can be summarised as follows:

- A focus on quality, adherence to humanitarian principles and prioritising vulnerable groups.

- First-hand knowledge of the field situation thanks to periodic monitoring visits and regular dialogue with partners, providing feedback to guide improvements.

- DG ECHO was seen to have an advantage of being able to have a strong advocacy voice on "uncomfortable" humanitarian issues, such as camp closure in **Myanmar**, taking advantage of the fact that it was not representing individual country interests with an associated national commercial or political agenda.

EU Member States

DG ECHO had some comparative advantages with respect to individual EU Member States due to its technical expertise, its in-depth understanding of humanitarian needs and the operating context, the strength of its analysis and the fact that it was able to maintain a principled approach without necessarily being subject to the same political pressures as an individual country. EU Member State representatives also agreed that DG ECHO was a valued source of information and analysis about the Rohingya situation. Its advocacy role was generally appreciated, including when engaging in joint advocacy. DG ECHO often took on an informal lead coordinate role in both countries for EU Member States for humanitarian issues by organizing meetings. This was not seen as an official arrangement but was perceived as a useful service.

Some EU Member States allocated substantial amounts of funding through bilateral channels to the Rohingya response, with most of the humanitarian funding being allocated from their respective capitals and monitored during periodic visits. Based on interviews with EU Member State representatives, DG ECHO's work was widely respected, and they viewed their own interventions as complementary to those of DG ECHO. According to FTS data, DG ECHO's annual contributions to the **Myanmar** HRP during 2017-2019 amounted to USD 33 million, compared to a total amount of USD 36.5 million allocated to the HRP by Germany, USD 28 million by Denmark and USD 24 million by Sweden. DG ECHO's overall contribution to the JRP for **Bangladesh** during 2017-2019 amounted to USD 75.8 million. This amount was also less than the combined contributions (total USD 117.3 million) to the JRP of the top three EU Member State donors over the same period: Germany (USD 57.8 million), Sweden (USD 33.5 million) and Denmark (USD 26 million).

EQ8 Achievement of Objectives

EQ 8	To what extent were DG ECHO's objectives (as defined in the Humanitarian Aid Regulations (HAR), the Consensus and the specific HIPs) achieved in both countries? What concrete results were achieved?

Summary Response to EQ 8

- Based on a qualitative assessment of outcomes while taking into consideration the challenging operating environments in both countries, DG ECHO was considered to have been reasonably successful in meeting its stated objectives of saving and preserving life and alleviating human suffering.

- Contributions by DG ECHO and their partners have yielded more positive results in **Bangladesh**, where positive changes in lifesaving sector indicators, such as mortality rates and nutritional status, have been observed in the camps. In **Myanmar**, "success" has tended to be measured in being able to mitigate against further deterioration in camps where IDPs have being living in sub-standard conditions by meeting their basic needs in terms of nutrition, WASH, etc.

- Most DG ECHO interventions were found to have achieved their objectives in terms of coverage of targeted beneficiary populations (90% in **Bangladesh** and 80% in **Myanmar** based on the project sample). Partner reporting on other key performance indicators (KPI) was variable, but results indicated that Sphere standards were met for nutrition and WASH sectors. The primary reason for not attaining objectives were difficulties in obtaining the necessary government permits and, particularly in **Myanmar**, lack of access to affected populations.

- DG ECHO's progressively increasing support for protection was seen as a key contribution in improving the humanitarian community's awareness of protection issues to help mitigate against constant threats.

DG ECHO's contribution during this response was multi-dimensional, ranging from financing direct humanitarian actions by humanitarian partners, advocacy, sharing data and analysis with peer donors, supporting humanitarian coordination, contributing to humanitarian-development dialogues and, particularly in **Bangladesh,** through their support to BBC Media Action, amplifying the "voice" of affected communities. These contributions are discussed in different sections of the report and synthesised in the conclusions. This section will focus on the results that DG ECHO achieved in the two countries, based on the logic model constructed by the team during the inception phase that refers to objectives in the HAR, the Consensus and HIPs for the scoping period.

The operating environments in both countries have posed significant challenges to implementation of humanitarian interventions.[79] In **Bangladesh** the arrival of hundreds of thousands of Rohingya asylum-seekers within a very short space of time from August 2017 put a significant strain on national resources and capacities. In **Myanmar** the outbreak of violence in August 2017 in Rakhine that led to the exodus was followed by other operations by the Myanmar Armed Forces together with a policy that has restricted access to affected populations, particularly in northern Rakhine. Severe restrictions on movements imposed on the Rohingya population by the government and poor environmental conditions in camps have contributed to a situation where humanitarian agencies have rarely been able to meet basic standards.

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[79] See, for example, Sida L. and Schenkenberg, E. (2019), Synthesis of Rohingya Response Evaluations of IOM, UNICEF and UNHCR.

Humanitarian agencies faced an additional challenge due to a risk of natural disasters. Flooding has been a risk for much of the displaced population in both countries and Cox's Bazar has been identified as one of the most cyclone-prone districts in **Bangladesh** with camps being especially fragile due to the temporary nature of shelters and camp infrastructure.[80]

Measured in terms of coverage, the evaluation team found it difficult to systematically measure the outcome-level results of DG ECHO's programmes in the two countries for several reasons. These include the fact that many of DG ECHO partner interventions were funded by multiple donors, the relatively low percentage (50% or below) of partner reports in the project sample that reported on outcomes since many of the KPIs used were output indicators.[81] Assessment of outcomes was therefore largely qualitative based on key informant interviews with partners and other stakeholders and focus group discussions with representatives of displaced populations and other affected community members.

Based on a qualitative assessment of outcomes while taking into consideration the challenging operating environments in both countries, DG ECHO was judged to have been reasonably successful in meeting its stated objectives of saving and preserving life and alleviating human suffering. As described in more detail below, contributions by DG ECHO and their partners have yielded more positive results in **Bangladesh**, where positive changes in lifesaving indicators (health, nutrition, etc.) have been observed in the camps.In **Myanmar**, "success" has tended to be measured in terms of being able to mitigate against further deterioration in camps where most IDPs have being living in sub-standard conditions.

The team's contribution analysis is based upon the Intervention Logic is shown in Table 3 below.

Table 3 – Summary contribution analysis to the Rohingya crisis[82]

Bangladesh	Myanmar
Needs	
1.3 million people in need, including both refugees and host communities. A total refugee population of 891,233 people, of which 55% are children, 52% are women and 31% of families report at least one protection vulnerability.	666,000 people in Rakhine in need of assistance. Especially those groups vulnerable due to the conflict, including GBV survivors. Significant barriers to accessing basic services in affected areas.
Objectives	
Priority given to lifesaving assistance to Rohingya refugees and most vulnerable host communities.	Address acute humanitarian needs and improve the resilience of conflict affected people.
Inputs	
EUR 82 million during 2017 – 2019. Partner co-financing and other forms of resource contributions.	EUR 29 million during 2017 – 2019. Partner co-financing and other forms of resource contributions.
Activities	

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[80] Sida (2020) **Myanmar** – including the Rohingya crisis in **Bangladesh** Humanitarian Crisis Analysis 2020.
[81] Additional details are available in Annex 3.
[82] Based on ECHO (2018) Humanitarian Implementation Plan (HIP) South, East, South-East Asia and the Pacific - V.1 12/10/2018 and

Bangladesh	Myanmar
Partners and interventions for the response were selected to meet the most acute needs and fill response gaps. Technical support to partners during selection and proposal preparation including help in revising the activities based on recent assessments and lessons learned, to avoid overlaps and ensure high standards. Supported and advocated for protection programming (including GBV), AAP, integration of gender and more sustainable solutions for displaced populations, including operationalising the Nexus approach. DG ECHO also supported coordination of humanitarian action in addition to joint analysis, monitoring and evaluation.	
Supported health and nutrition in underserved affected areas. Supported WASH, food security (including CVA). Supported basic solutions for shelter to enhance resilience in addition to education in emergencies Also supported non-formal learning opportunities and soft-skills activities.	In *Northern Rakhine*, DG ECHO prioritised protection (including child protection), food, nutrition, health, and psychosocial support. In *Central Rakhine*, DG ECHO supported dignified solutions to displacement through targeted support for emergency shelter and WASH repairs, food security, NFIs in camps while continuing to advocate for durable solutions in line with international standards.
External Factors	
Legal and regulatory environment, funding levels, inter-communal tensions, partner capacities and access to affected populations.	Conflict and insecurity, legal and regulatory environment, inter-communal tensions, funding levels, partner capacities.
Outputs	
Targeted vulnerable people received integrated humanitarian assistance and protection. DG ECHO provided support across a range of lifesaving sectors, namely food security, nutrition, health, WASH, DRR (Figure 9). Protection was integrated into interventions which helped to ensure that benefits reached the most vulnerable.	
Some 45% of projects sampled either integrated protection into a sectoral intervention or had it as a specific activity (Table 2).[83]	70% of the projects sampled either integrated protection into a sectoral intervention or had it as a specific activity (Table 2).
Improved interagency coordination, community engagement and broader awareness of assistance and protection needs. DG ECHO and partner staff regularly participated in interagency coordination meetings, supporting the broader humanitarian community with information and analysis.[84] Partners cited several examples during interviews where DG ECHO had requested partners to modify their interventions so as to avoid overlaps and ensure that sectoral approaches were aligned with guidance from clusters. DG ECHO supported interagency NGO platforms[85] and encouraged partners to integrate AAP. In **Bangladesh**, DG ECHO worked	

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[83] The sampled projects represented around 50% of protection budget in each country (51% in Bangladesh and 46% in Myanmar).

[84] BBC Media Action (2019), "What contribution is the Common Service making to community engagement and accountability in the Rohingya response?"

[85] http://themimu.info/INGOs

Bangladesh	Myanmar
closely with UN and NGO partners to move to a community-based protection approach, which helped to both increase awareness and coverage	
Joint advocacy products and actions designed to improve access to and dignity of affected populations.	
Joint advocacy to create space for more dignified and sustainable interventions, including access of refugees to education and livelihood opportunities. Supported actions to improve communication with refugee and host populations.	DG ECHO contributed to joint efforts to improve humanitarian access with limited success due to the ongoing conflict and position of the government. Played a pivotal role in reaching a consensus within the HCT on a position paper on the government's camp closure policy.
Results[86]	
Humanitarian assistance and protection project-based support targeting between 16,000 and 1.3 million Rohingya and host community members.	Humanitarian assistance and protection project-based support targeting between 2,800 and 500,000 IDPs and surrounding communities.
DG ECHO partners met or exceeded 90% of beneficiary coverage targets for the sampled projects' activities in Bangladesh. Of the outcomes reported, nutrition and WASH activities met Sphere standards.	DG ECHO partners met or exceeded 80% of beneficiary coverage targets for the sampled projects' activities in Myanmar. Of the outcomes reported, nutrition and WASH activities met Sphere standards.

Several elements indicated that DG ECHO's response had contributed to its stated objectives[87] of saving lives, stabilizing the situation and alleviating human suffering in challenging operating environments. This was generally confirmed by interviewed stakeholders, a review of a sample of projects and other secondary data DG ECHO. DG ECHO also consistently advocated for maintenance of human dignity and respect of humanitarian principles for displaced Rohingya and other communities impacted by the crisis.

DG ECHO's budget of EUR 111 million during 2017-2019 was mainly allocated to lifesaving sectors (Figure 9). While it was not possible to demonstrate direct causality for reasons described above, DG ECHO-supported interventions, supplemented by their constructive engagement with collective advocacy and interagency coordination, indicated DG ECHO had contributed to bringing mortality rates below emergency thresholds in the camps in **Bangladesh**, a judgement that was largely validated by interviews with partners and other donors. As shown in Figure 11 below, although both the overall crude mortality rate (CMR) and the CMR rate for Rohingya over 50 years of age (>50) exceeded emergency thresholds during 2017 these had been brought under control by the beginning of 2018. The CMR for children under-five years of age (<5) was also reduced by around half. This compares favourably with a previous influx into **Bangladesh** during 1978 when some 10,000 people died in squalid conditions in the camps.[88]

As shown in the tables in Annex 66, an analysis of the project sample showed that partners reported mainly on activities and outputs. In **Bangladesh**, only around 50% of DG ECHO partners were found to be reporting using outcome indicators. In **Myanmar**, where access

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[86] Based on available data. Apart from coverage of the population, data quality and availability varied according to the sector/partner. Availability of data was better in Bangladesh due to difficulty in accessing some areas of Rakhine.

[87] COUNCIL REGULATION (EC) No 1257/96 of 20 June 1996 concerning humanitarian aid, Article 2a, 2b.

[88] Sida L. and Schenkenberg, E. (2019), Synthesis of Rohingya Response Evaluations of IOM, UNICEF and UNHCR.

is limited and there is resistance by authorities to humanitarian agencies conducting any kind of activity that resemble a survey, the percentage decreased to 30-40%. As a result, GAM rates in **Myanmar** remained at emergency levels without showing significant improvements during 2017-2019.

Measurement using output indicators was more common and, based on relevant key performance indicators of coverage in sampled partner reports, DG ECHO partners met or exceeded 90% of beneficiary targets for project activities in Bangladesh and 80% of targets in Myanmar. The main reason reported by partners in **Myanmar** for not reaching beneficiary targets was difficulty in accessing affected communities. In **Bangladesh**, reasons for non-attainment of objectives were more varied and included delays in obtaining government approval, availability of skilled health service providers, forced suspension of activities and, for one project, inappropriate site selection of health facilities.

Figure 11 – Mortality in Rohingya refugee camps, Bangladesh
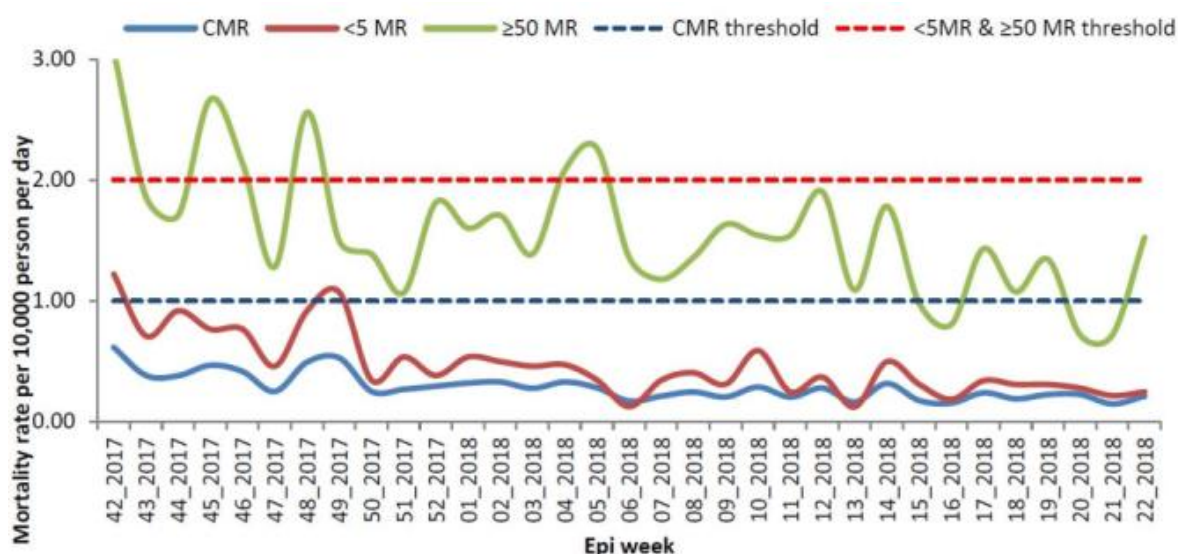
Source: MSF, in Sida, L. & Schenkenberg, E. Synthesis Report IOM, UNHCR, UNICEF. December 2019.

Notes: The Crude Mortality Rate (CMR) refers to the mortality rate from all causes of death, under five (<5) mortality rate corresponds to the probability of dying between birth and 5 years of age, and above-fifty (>50) mortality rates to the probability of dying for people age more than 50 years old. The X-axis represents the weeks of the year. It starts on the 42nd week of 2017 (i.e. 16/10/2017) and ends on the 22nd week of 2018 (i.e. 28/05/2018).

Protection

Protection of the Rohingyas has been a crucial cross-cutting issue in both **Myanmar** and **Bangladesh** in a context characterised by conflict, gross human rights violations, and discrimination. Protection progressively became an increasingly important focus during the 2017-2019 period and was widely acknowledged by key informants as a valuable contribution by DG ECHO**.** At the beginning of the crisis there was concern that protection was not adequately addressed.[89] Protection was a key component in nearly 70% of the projects sampled in **Myanmar** and 45% of projects sampled in **Bangladesh** (see Table 3 above).

As described above, DG ECHO's support not only helped meet protection needs but provided valuable information about the status of vulnerable groups. In **Bangladesh**, where the range of permitted activities has been wider, there was better protection coverage, including child protection and GBV sub-sectors so that, by the end of 2019, all camps and 11 host community areas had been covered. DG ECHO's contribution to protection in **Bangladesh** included providing funding and technical support to UN and NGO protection partners with their objective of shifting to a community-based approach, which helped to

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[89]   Sida L. and Schenkenberg, E. (2019), Synthesis of Rohingya Response Evaluations of IOM, UNICEF and UNHCR.

significantly improve protection coverage. In addition to increasing protection coverage of the Rohingya population in **Bangladesh**, there were indications that the community-based system mitigated the effects of COVID-19 when access by humanitarian staff became much more restricted. A similar trend was observed in **Myanmar** where progressively greater involvement of IDPs helped with more consistent support, which mitigated the challenge that agency staff experienced in accessing camp populations. Interviews with camp residents in both countries both confirmed overall improvements in the protection situation since 2017, even if protection-related threats were still prevalent.

By supporting integration of protection-related activities adapted to the gender and age groups across multiple sectors, DG ECHO has managed to leverage its influence and promote its comprehensive gender policy guidelines among humanitarian actors. Addressing protection, including GBV, was challenging in both countries due to forced displacement along with the effects of violence and culture. Vulnerability was increased in both countries by statelessness, the lack of official documentation and restricted access, particularly in **Myanmar**. DG ECHO and its partners, overall protection and GBV achievements in the camps and some neighbouring host communities have been significant. By the end of 2019 almost 400,000 Rohingya refugees in Bangladesh (47% of the total population) had been reached with GBV services, mostly through mass awareness-raising campaigns. Over 280,000 of those reached were women and girls (63% of the total).

Nevertheless, available evidence indicated that many victims were not adequately reached. A study by IRC[90] found that at least one in every four women or girls screened was a survivor of GBV, but they faced challenges with a large dropout rate of GBV survivors due largely to a reliance on informal systems by the Rohingya community.[91] A review of 18 DG ECHO projects with actions targeted at GBV issues highlighted the following:[92]

- GBV-Protection activities categorised as <u>prevention</u> included public and targeted awareness-raising sessions, outreach to households, help desk and management of safe space in the camps where GBV survivors can be detected. Training and advocacy were provided to local partners, officials and target populations.

- GBV-Protection activities categorised as <u>responses</u> included case management for GBV survivors with psychosocial assistance, referral pathways to specialised actors for medical treatment, legal aid, dignity kits, flashlights, adapted shelter, adapted WASH facilities with lighting, cash handouts, life-skill training and livelihoods.

- In the sampled projects the type of Health-GBV targeted activities were often not specified so it was unclear whether the approach was clinical management of rape survivors, psychological counselling or another intervention type.

Nutrition, Health and WASH

Another area of focus for DG ECHO has been to address malnutrition which, at least in Bangladesh, has shown improvements over the evaluation period. Nutrition surveys, funded by DG ECHO and other donors, conducted by ACF during late 2017 found that the nutritional status of Rohingya children in Cox's Bazar District exceeded the World Health Organization (WHO) global emergency thresholds for both wasting and anaemia. Prevalence of wasting among children was 19.4% in the first survey but declined significantly during the subsequent 6 months. Improvements in nutritional status coincided with an increased coverage of household food rations, distributions of fortified blended

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90 Gerhardt L., Katende S. and Skinner M. (2020) "The Shadow Pandemic: Gender-Based Violence among Rohingya refugees", IRC.
91 The majority of cases referred to the Majhi (block leader) and Imam (religious leader) where most of the cases were resolved without legal action. Social and cultural norms around divorced women and subservient role of women also play a role. See Oxfam, Save the Children and Action Contre la Faim (2018) Rohingya Refugee Response Gender Analysis: Recognizing and responding to gender inequalities.
92 See Case Study 1 in the annex for additional details.

foods and micronutrient powders, and other public health interventions.[93] In Myanmar it was difficult for agencies to obtain authorization from authorities to conduct surveys in Rakhine State and it was difficult to obtain an accurate picture of the nutrition situation. However, malnutrition has continued to be seen as one of the immediate causes of morbidity and mortality amongst the Rohingya population.[94]

Apart from nutrition-related support, DG ECHO provided funding for food assistance in both countries through WFP and, in **Myanmar**, also to ICRC's multi-sectoral programme which included food distributions to populations in northern Rakhine. DG ECHO funding has been a relatively small proportion of their budgets, less than 1% of these agency's overall budgets. Despite the relatively small contributions, these have provided DG ECHO with an entry point to participate in partner consultations and advocate for more cash-based assistance.

DG ECHO has also supported health services in **Bangladesh**, which scaled up to 32 Primary Health Care Centres. Outbreaks of diphtheria in 2017 and measles in 2018 were contained thanks in part by an early-warning system supported by DG ECHO.[95]

WASH-related activities showed some progress during 2017-2019, although gaps remain in both countries with lack of space in crowded camps posing a major challenge. This has been a particular challenge in **Myanmar**, where none of the camps meet Sphere standards, notably for WASH and space requirements. The situation in **Bangladesh** was more positive but shortages of water remained a concern, given the diminishing water tables.

Disaster Risk Reduction

DRR projects have shown mixed results. In **Bangladesh** a DRR consortium of three partners led by IOM was an example of how pressure from donors does not necessarily create productive partnerships. While output shelter targets for Rohingya beneficiaries were largely attained, evidence from interviews and project reports found that the consortium experienced difficulties in achieving planned longer-term outcomes due to tensions between partners and the challenges of coordination between different government entities.[96] DG ECHO's acknowledged expertise and experience in DRR in both countries has nevertheless provided them with useful platform to promote joint activities between host and displaced communities in both countries. DG ECHO initiatives have improved information management and co-ordination systems, and as such early response mechanisms, and have responded in each country to flooding and cyclone disasters in both camps and surrounding communities.

DG ECHO had also been supporting DRR and resilience interventions in **Myanmar** for many years prior to the 2017 Rohingya crisis, including preparedness for cyclones and floods which are recurring hazards for Rakhine state. Sub-standard conditions in the camps, constraints on freedom of movement and insecurity in many parts of Rakhine State that have eroded resilience have obliged partners to adapt and ensure that DRR is integrated[97] within their interventions.

Accountability to Affected Populations (AAP)

DG ECHO has been supporting AAP in both countries by helping to ensure that community-level voices are heard, while at the same time improving community access to information through provision of community engagement tools and relevant training. Regular consultations with partners and field monitoring visits by DG ECHO staff have helped to

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93 Leidman, E. *et al.* (2020) Malnutrition trends in Rohingya children aged 6–59 months residing in informal settlements in Cox's Bazar District, Bangladesh: An analysis of cross-sectional, population-representative surveys.
94 OCHA (2019), 2020 Humanitarian Response Plan for Myanmar.
95 World Health Organization (2018), Rohingya Refugee Crisis 2017-2018. Public Health Situation Analysis, 7 May 2018.
96 DRR in the camps fell under the RRRC and in host communities under the responsible district authorities.
97 The approach used by DG ECHO partners is described in OCHA (2019) Humanitarian Response Plan for Myanmar: Humanitarian Programme Cycle 2020.

amplify community-level voices of both Rohingya and surrounding communities. DG ECHO's support, both in terms of funding and technical support, to NGO platforms in both countries has also had generally positive results although, as described below, politicisation of these platforms has reduced their effectiveness.

In **Bangladesh**, DG ECHO has been able to achieve relatively more progress through its support for applying a common accountability framework, identified as a gap during the early phases of the response.[98]   Another strategic intervention that DG ECHO was supporting has been the BBC Media Action's Common Service for Community Engagement and Accountability project to support the Rohingya population in camps. Interviews with donors and partners found that the information generated was widely used to guide their interventions. This intervention has also helped to assess the extent of AAP. Studies indicated that the Rohingya access to information so that they could make decisions about their daily lives increased from 23% to 92% between late 2017 and 2019. At the same time there continued to be some continuing confusion about how to access services and meet basic needs, resulting in uncertainty and rumour-mongering.[99]

Unintended outcomes

Most examples of unintended outcomes identified during this evaluation emerged from interviews and focus group discussions with host communities who described various adverse effects of the influx on the host communities in **Bangladesh**. Residents from camps and host communities interviewed tended to be more familiar with DG ECHO's partners than with DG ECHO itself. Their views of the impact of the Rohingya crisis tended to be general, rather than aimed specifically at DG ECHO or their partners. Examples of adverse impacts cited by host community interviewees included the reduced land fertility, water shortages, deforestation and impacts from widespread selling of in-kind assistance.[100] Interviewees also complained about the impact on the local labour market, including competition with the Rohingya who were willing to work for lower wages and the tendency for good teachers to leave schools in the host community to join Rohingya learning centres for higher salaries. Young people preferred to get jobs in the camps than to continue their education. Some interviewees from host communities complained about the lack of transparency about targeting criteria when agencies distributed assistance.

Tensions between camp populations and surrounding communities on both sides of the border have been fuelled by the perception that displaced populations receive preferential treatment. DG ECHO partners took steps to reduce these tensions by considering needs of the host communities during programme planning and design using a "do no harm" approach by, for example, increasing the availability of water in villages nearby camps in **Myanmar** during the dry season. In **Bangladesh**, despite advocacy by DG ECHO that a needs-based approach should be adopted, the government stipulated that agencies should use a ratio of 4:1 when providing assistance to the Rohingya and host communities respectively.

The pandemic had not been considered as a scenario during contingency planning by DG ECHO or other humanitarian agencies, but it was evident that a number of DG ECHO-supported interventions contributed to resilience, notably community information systems that had been developed as part of partner strategies.

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[98]   Sida L. and Schenkenberg E. (2019), Synthesis of Rohingya Response Evaluations of IOM, UNICEF and UNHCR.
[99]   BBC Media Action (2019), What contribution is the Common Service making to community engagement and accountability in the Rohingya response?
[100]   These findings were consistent with findings of other studies. See, for example, UNDP (2018) Impacts of the Rohingya refugee influx on host communities.

EQ9 Advocacy and Communication

EQ 9	How successful was DG ECHO through its advocacy and communication measures in influencing other actors by direct and indirect advocacy on issues like humanitarian access and space, respect for humanitarian principles, relevant legal frameworks and addressing gaps in response? Was there an 'advocacy gap'?

Summary Response to EQ 9

- DG ECHO focused its advocacy efforts on improving AAP and community-based protection approaches, contributing to the evidence base to strengthen the case for CVA and improving humanitarian access, which has been a particular challenge in **Myanmar**. Advocating longer-term solutions for displaced populations, including creating conditions that could be conducive to an eventual voluntary return of displaced Rohingya populations to Myanmar.

- Shared challenges, mainly stemming from difficult operating environments, provided incentives for the international community to try and agree on joint advocacy messages and approaches. DG ECHO actively supported developing joint advocacy in both countries to ensure consistent messaging to governments and other key stakeholders, although policy environments in both countries have limited the success of joint advocacy initiatives. There were nevertheless some positive examples of joint advocacy initiatives where DG ECHO has made a contribution, such as increasing CVA options for refugees in **Bangladesh** and facilitating the development a common position by the HCT on the government's camp closure policy in **Myanmar**.

- Most of DG ECHO's direct advocacy was within humanitarian coordination mechanisms. DG ECHO did interact with government authorities, notably in **Bangladesh**, but most of their advocacy with governments was joint advocacy with other donor representations or through their colleagues in the EU Delegations as part of their ongoing dialogue with government partners.

- Periodic missions to both countries by DG ECHO HQ staff, including some high-level missions, provided opportunities to communicate relevant advocacy messages at both country and global levels. High-level consultations at global level facilitated a common position by the HCT on the government's camp closure policy in **Myanmar** to promote dignified durable solutions for IDPs.

Advocacy and communication strategies

Advocacy was a key element of the HIPs in both countries during 2017-2019. DG ECHO's advocacy mainly concerned humanitarian principles, respect for IHL and rights-based and conflict-sensitive approach as well as policy dialogue/change. DG ECHO focused its direct advocacy on UN agencies, NGOs and national civil society organisations. It advocated improving humanitarian access, promoting greater use of CVA, encouraging adoption of medium- to long-term solutions and informing and facilitating shared advocacy positions on issues of mutual concern to the international humanitarian community.

Most of DG ECHO's direct advocacy was within humanitarian coordination mechanisms. DG ECHO did have some interactions with government authorities, notably in **Bangladesh**, but most of their interactions and advocacy with national governments was through the EU Delegations or as part of joint advocacy with other donor representations. Although this division of roles was reported to have worked reasonably well, DG ECHO's advocacy based on respect of humanitarian principles occasionally met with resistance when the issue and/or timing was judged to be so sensitive that it could potentially block the progress of other processes, since humanitarian agencies depend on the governments in both countries for permits and visas. This was particularly the case in **Myanmar** where DG ECHO has periodically advocated that "red lines" be drawn to determine when disregard for humanitarian principles justifies suspension of all international humanitarian assistance.

Periodic missions to both countries by DG ECHO HQ staff, including some high-level missions,[101] provided opportunities to communicate relevant advocacy messages at both country and global levels. Joint missions with DEVCO and EEAS staff helped develop relevant advocacy messages for non-humanitarian audiences. There were also high-level consultations at a global level which helped, for example, in reaching a common position by the HCT[102] on the government's camp closure policy in **Myanmar** to try and promote dignified durable solutions for IDPs, including mitigating against further ethnic segregation.

Communication with communities

DG ECHO's support of the NGO platform, both through financial support and through providing technical advice, has helped to expand collective NGO advocacy efforts and information sharing. The NGO coordination has been nevertheless problematic. In **Bangladesh** in particular, coordination and joint action has been handicapped by political agendas, notably a perception by some national NGO members that the international community has failed to meet their Grand Bargain commitments on localisation.

Some interviewees suggested that the EU's advocacy approach could have been better oriented so as to more effectively address concerns of governments and communities impacted by the presence of the Rohingya who felt that their needs were not being adequately addressed.

Joint advocacy

Several shared challenges provided incentives for the international community to try and agree on joint advocacy messages and approaches. Challenges included restrictive policy environments of host governments that discouraged sustainable solutions, fragmented and unfamiliar coordination structures and, notably in **Myanmar,** difficulties in accessing affected communities. Other influencing factors included insecurity, different political agendas,[103] freedom of movement of Rohingya and access to land. These factors, along

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[101] DG ECHO (2017) Rohingya Crisis: Commissioner Stylianides visits Bangladesh and reaffirms EU humanitarian support. Press Release dated 31 October 2017.

[102] HCT Myanmar (2019) Operating Principles for Humanitarian Organizations In Displacement Sites Declared "Closed" by the Government In Central Rakhine: A Position of the Myanmar Humanitarian Country Team.

[103]   Insecurity was caused both by the ongoing conflicts in Rakhine State and criminal activities, notably drug trafficking, in the camps in Bangladesh. Political factors included

with competition for funding, were a catalyst for interagency competition, and the lack of clarity about roles and responsibilities made it more difficult to develop a coherent approach by donors and international agencies on politically-sensitive issues.

Some key areas where DG ECHO played a significant role in supporting joint advocacy efforts included:

- **Humanitarian access** to affected populations was a constant challenge for humanitarian agencies during the response, especially in **Myanmar**. Partners in **Bangladesh** were appreciative of occasional support provided by DG ECHO in helping them to obtain necessary permits from concerned authorities to facilitate project implementation.

- **Encouraging CVA approaches** whenever practically feasible. This was evident with DG ECHO's support to WFP-led efforts to transition from in-kind assistance to e-vouchers in **Bangladesh** where there has been strong resistance from national authorities to cash-based (unconditional) assistance for Rohingya communities.

- **Selection of suitable sites for displaced populations** in line with humanitarian principles. In **Bangladesh**, DG ECHO provided support in site planning and emergency shelter during the early phase of the response and has been one of the numerous donors, UN and INGO advocating against relocation of refugees to Bashan Char island before an independent technical assessment of the island's viability is conducted and a clear protection framework established.[104] In **Myanmar**, DG ECHO helped in developing and promoting a common HCT position[105] on operating principles in camps declared closed by the Government in Rakhine to provide basic measures to prevent[106] humanitarian funding from being used to further entrench segregation by stipulating that any non-life saving interventions in such areas should be conditional on greater freedom of movement and access to basic services for Rohingya.

Advocacy for longer-term approaches

Advocacy for durable solutions in line with international standard has featured as a recurring objective in successive HIPs. DG ECHO has been supporting DRR interventions since the 1990s in both countries and these enabled DG ECHO to continue their support to the government in increasing resilience of both Rohingya and surrounding communities. It has also positioned DG ECHO to support coexistence since DRR interventions target both displaced Rohingya and the wider district of Cox's Bazar and involve different government departments.

While DG ECHO has had an influential role in humanitarian advocacy, the protracted nature of the crisis has required a broader approach and is a component part of the Nexus approach described above. In the case of the EU missions in each country, the quality of interactions between staff in different parts of the respective EU Delegations, notably between DG ECHO and DG DEVCO, played a role in how coherent these joint advocacy efforts have been. As described in more detail under EQ6 and EQ11, coherence between different sections of the EU Delegations have continued to improve in both countries, but

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sensitivities of both governments about undesirable external interference in their internal affairs and suspected links of militants with terrorist groups.

[104] Siegfried, K. (2020) The Refugee Brief – 8 May 2020. UNHCR.
[105] HCT Myanmar (2019) Operating Principles for Humanitarian Organizations In Displacement Sites Declared "Closed" by the Government In Central Rakhine: A Position of the Myanmar Humanitarian Country Team.

[106] Government of the Republic of the Union of Myanmar Ministry of Social Welfare, Relief and Resettlement (2019) National Strategy on Resettlement of Internally Displaced Persons (IDPs) and Closure of IDP Camps.

several interviewees in both countries cited examples of mixed advocacy messages from different parts of the EU Delegation though consistency has improved in this area as well.

DG ECHO advocacy for humanitarian principles is widely respected amongst the international humanitarian community but has been less influential with the government with whom they have little direct engagement, preferring indirect advocacy at different levels within the EU Delegation and *via* representatives of bilateral donors. Efforts by the EU and other western donors to advocate collectively on Rohingya issues with the **Myanmar** government and regionally have met with limited success.[107]

The multiannual EU strategy for the Rohingya crisis described joint advocacy in broad terms and the Nexus Standard Operating Procedures[108] developed in **Myanmar** included mechanisms to develop joint positions for pertinent topics, including voluntary return, camp closures, forced displacement, education in emergencies, nutrition, freedom of movement and access to basic services. Some interviewees nevertheless felt that DG ECHO, together with other sections of the EU, could further refine their tactics and broaden the advocacy platform that would resonate better with host communities and national governments.[109]

EQ10 Cost-effectiveness

EQ 10	To what extent did DG ECHO achieve cost-effectiveness in its response? What factors affected the cost-effectiveness of the response and to what extent?

Summary Response to EQ 10
- Much of DG ECHO's efforts to improve cost-effectiveness was at the selection stage of interventions when it attempted to avoid duplicating efforts, encouraged synergies and coordination. Although cost-efficiency was not listed as one of the main assessment criteria in the HIP, in practice DG ECHO also considered cost-efficiency of the different components of the activities they selected.   - However, a general lack of cost-effectiveness analysis and monitoring made it difficult to assess the cost-effectiveness of DG ECHO's actions. The monitoring of efficiency and cost-effectiveness at the project level was inconsistent, with variable attention paid to cost-effectiveness by partners.   - An analysis of budget and financial data suggested that DG ECHO's interventions limited staff costs and maintained unit costs as budgeted. Unit costs per beneficiary for actual expenditures were mostly lower than budgeted costs which was an indicator of efforts by DG ECHO and partners to reduce costs.   - Restrictive government policies in both countries were a major impediment to improving cost-effectiveness. Access restrictions and administrative processes have resulted in delays or even suspensions of planning activities. In addition, obstacles to Cash and Voucher Assistance (CVA), particularly in Bangladesh, and longer-term approaches have also reduced cost effectiveness.

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[107]   Sida L. and Schenkenberg, E. (2019), Synthesis of Rohingya Response Evaluations of IOM, UNICEF and UNHCR.

[108] EU Delegation Myanmar (2019), Nexus Standard Operating Procedures (SOPs).
[109] An example was the relative lack of awareness amongst EU key informants of the role of the ASEAN Coordinating Centre for Humanitarian Assistance on disaster management (AHA). See, for example, Spandler, K. (2020) Lessons from ASEAN's Rakhine response. East Asia Forum. More details about AHA's role are provided in Case Study 3 in the annex.

- The fact that DG ECHO is not by its regulations allowed to directly fund national NGOs limited options for reducing overhead costs. This constraint is likely to become more important in future as local actors are likely to play an increasing role in the Rohingya crisis.

- DG ECHO has been relatively successful in leveraging its available funding and limited human resources in both countries to achieve a reasonable level of cost effectiveness. Spreading funding across a relatively large number of partners and sectors to increase the quality of analysis and amplify advocacy helped to justify the relatively high transaction costs that comes with this approach.

DG ECHO's primary concern has been to ensure the relevance and quality of funded interventions. Cost-efficiency considerations were not part of the main assessment criteria used by DG ECHO to select interventions in the HIPs. Instead, it focused on the relevance, quality of needs assessments and the response strategy and logical framework, feasibility, knowledge of the country/region, and implementation capacity and technical expertise of the partner. Cost-efficiency is still listed as an additional criterion that can be looked at in specific cases and the FichOp guidelines indicate that cost-efficiency should be accounted for when selecting interventions. DG ECHO's main approach toward ensuring cost-effectiveness has consisted in carefully selecting interventions, as described in more detail below. The thematic policy documents produced by DG ECHO HQ may include cost-effectiveness considerations,[110] but it was not evident that DG ECHO was applying their recommended cost-effectiveness guidelines or tools in either country.

DG ECHO's made efforts to avoid duplication of efforts and encouraged synergies. DG ECHO select and adjust interventions such that they would not duplicate other donors' (or DG ECHO's own) activities in the sector, for example by requesting careful review of the activities in the sector.[111] DG ECHO also considered possible synergies between projects, including funding consortia with the objective to realise economy of scale and increase cost-effectiveness.[112] DG ECHO opted for partners with already a long experience with the Rohingya refugee crisis and valued partners with high coordination capacity, with connections to government officials and camps administration.

DG ECHO staff considered costs when assessing potential partners and reviewing proposals and procurement plans of partners. The analysis of the selection process ("Dashboard") showed that DG ECHO had specific cost-efficiency standards when selecting interventions. It ensured that staff and support costs were not too high and attached importance to the share of costs benefiting the beneficiaries. DG ECHO also used benchmarking unit cost for some activities (e.g. a WASH activity costing EUR 33 per beneficiary was deemed not cost-efficient, and a USD 90 per shelter below the sector standards). Other examples of practices aiming at increasing cost-effectiveness include the recruitment of IDP volunteers by DG ECHO partners in camps in Rakhine that not only helped to reduce costs, but also increased community participation and ensured that implementation did not stop during periods when access for partner staff was not possible.

The lack of cost—effectiveness analysis made it difficult for the team to assess cost-effectiveness for most of the project sample. Indeed, it could not find examples of cost analyses carried out either by DG ECHO or by their partners. Such analyses could have provided insights into costs and benefits of the choices made. Only few project reports provided a cost driver analysis for their activities. Partners noted during interviews that DG ECHO did not request cost analyses but tended to place emphasis on quality.

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[110] ADE (2017), "Study on Approaches to Assess Cost-Effectiveness of DG ECHO's Humanitarian Aid Actions" for additional guidance, DOI: 10.2795/568443. This was referenced in the TOR.

[111] For example, the Dashboard for the selection of interventions in Bangladesh in relation to the 2018 HIP reveals that the CVA component of an intervention had to be revised to be aligned with DG ECHO and funding from other donors (e.g. the Cash Working Group).

[112] For example, in 2019 DG ECHO suggested that the IRC works with DRC in Myanmar, to form a large consortium as they were working in similar areas and this would allow be beneficial from an advocacy perspective.

An analysis of budget and expenditures data provide some indications regarding the cost-efficiency and the main cost drivers of DG ECHO's interventions. Financial data for a project sample of 18 sample projects show that the achieved cost per beneficiary of interventions have been slightly lower to the planned cost per beneficiary in general, both in Myanmar (Figure 12) and Bangladesh (Figure 13). This is partly explained by larger number of beneficiaries than expected while the costs are maintained overall. Evidence from interviews with DG ECHO partners also suggest they have been making efforts to reduce costs and increase coverage.

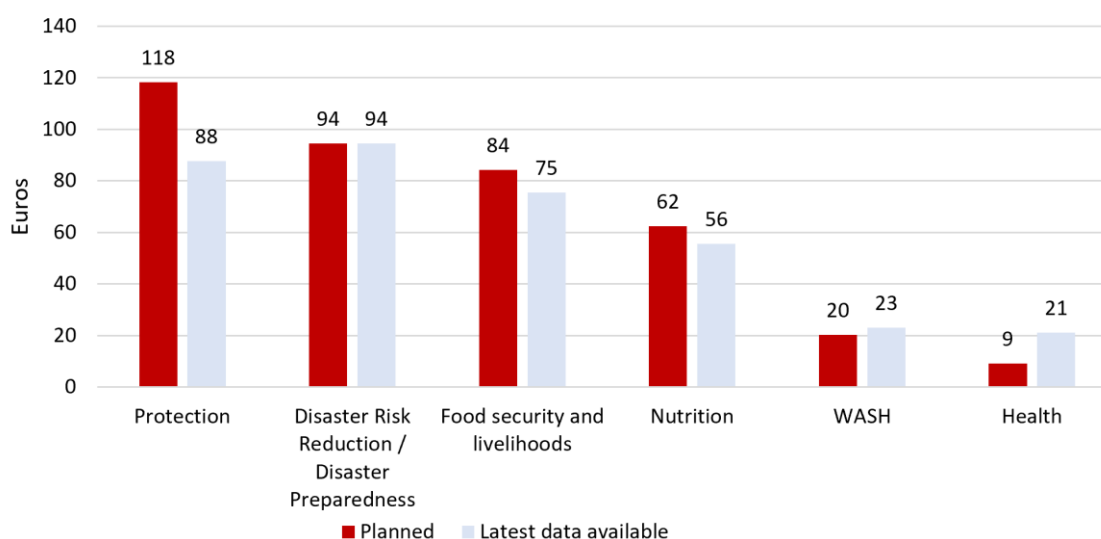**Figure 12 – Cost per beneficiary 2017-2019: Bangladesh**
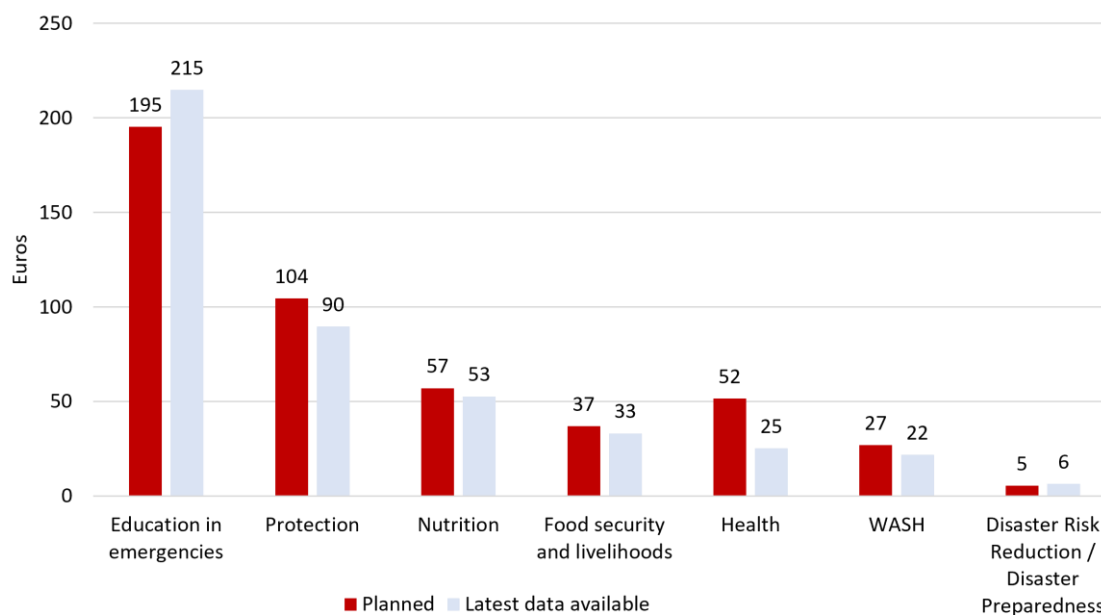
Source: ADE's calculations based on ECHO's partner financial reports (HOPE database)
Notes: Calculations are based on a selected list of 8 interventions. "Planned" corresponds to the cost per beneficiary as specified in the latest budget. "Latest data available" corresponds to the cost per beneficiary according to the interim report for 4 interventions and the final report for the other 4 interventions considered.

Operating in Myanmar appears to be more costly due to access constraints and more scattered activities. The cost per beneficiary ratio in **Myanmar** was higher than in **Bangladesh,** notably for protection, food security and livelihoods and nutrition activities. Apart from more difficult access, another major influencing factor was the smaller and more dispersed nature of the population which imposes higher transaction costs (e.g. transportation, multiplicity of activities, etc.) in comparison to the interventions in refugee camps in Bangladesh.

Figure 13 – Cost per beneficiary 2017-2019: Myanmar

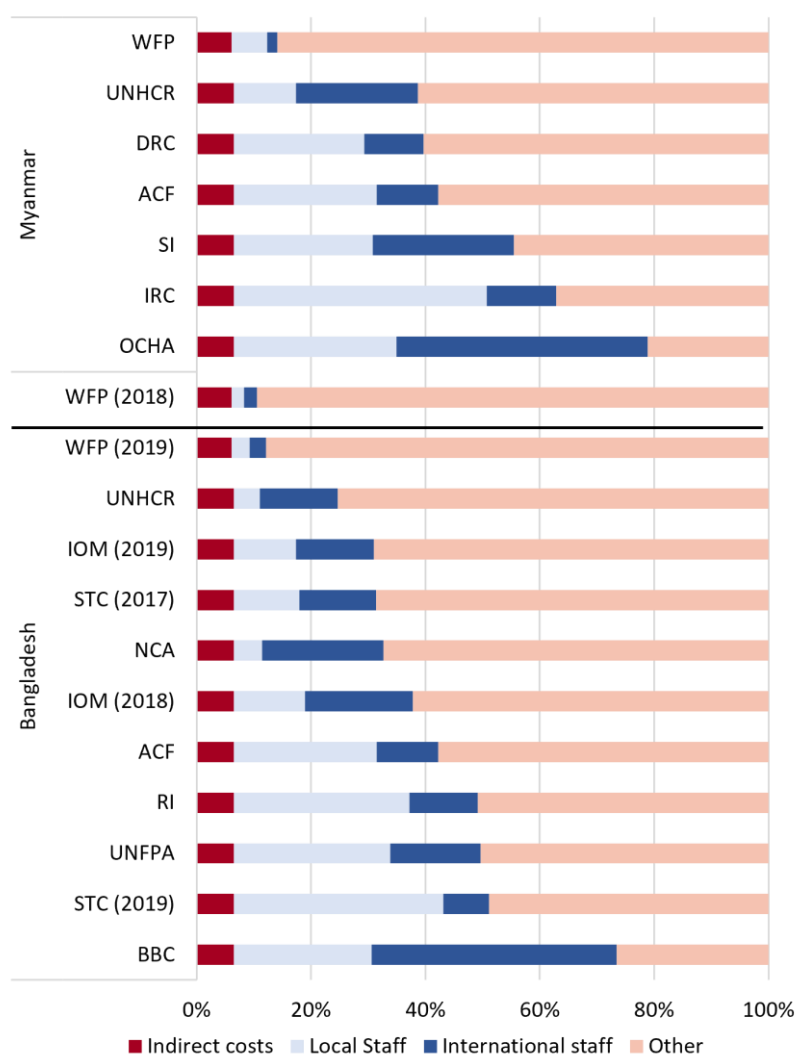Source: ADE's calculations based on ECHO's partner financial reports (HOPE database)
Notes: Calculations are based on a selected list of 14 interventions. "Planned" corresponds to the cost per beneficiary as specified in the latest budget. "Latest data available" corresponds to the cost per beneficiary according to the interim report for 4 interventions and the final report for the other 10 interventions considered.

An analysis of the sampled projects in both countries shows that the international and national staff were the major cost drivers. For the subsample of projects presented in Figure 14 below, a total of 20% of the costs were allocated to local staff and 17% to international staff (excluding WFP interventions which have very large budget and would reduce the share to 7% and 6% respectively if they were included). NGOs tend to spend a larger proportion of their budget on national rather than international staff. In **Myanmar** this frequently included camp residents. A notable exception was WFP, where combined value of in-kind and CVA assistance amounted to around 85% of the project budgets in each country (and staff costs to around 5% overall), which contributed to the overall cost-effectiveness of DG ECHO's response.

Certain interventions rely specifically on human resources and justify large proportion of staff costs. Agencies like OCHA, with a coordination and information management role, and interventions like the BBC Media Action's project, which focuses on communication activities, rely mostly on human resources.

Other factors contributing to relatively high staffing costs could be attributed to DG ECHO's focus on protection, which was labour-intensive (notably due to individual case management of vulnerable groups). Staff costs tend to be a higher proportion of budgets in **Myanmar**, which can partly be attributed to additional transaction costs related to access which has caused delays in implementation or temporary suspension of activities.

Figure 14 – Cost drivers for sampled projects

Source: ADE's calculation based on ECHO's partners' budgets (HOPE database).

Restrictive government policies have had major impacts on cost effectiveness, which considers not only cost-efficiency but also quality,[113] of DG ECHO operations:

- **Delays in obtaining necessary permits** have led to shortened implementation periods and, in a few cases, suspension of project activities. International staff experienced difficulties in getting visas and/or permits to visit project sites to carry out technical support and quality control functions.

- **Restricted transfer modalities**, of which a primary example was the limited use of CVA as an alternative to in-kind assistance for the Rohingya population in **Bangladesh** due to restrictions imposed by the national authorities. In **Myanmar**, restrictions on CVA have been mainly imposed by market conditions, particularly in northern Rakhine where the ethnic conflict has resulted in chronic underdevelopment of the region.

- **Restrictions on outcome monitoring**, including surveys and post-distribution monitoring, in **Myanmar** has limited the ability of agencies to both update their assessments of priority needs and verify that the assistance provided met priority needs.

- **Limited medium- to long-term programming options**. In **Bangladesh**, this was mainly due to resistance by national authorities to any option for the Rohingya apart from repatriation to **Myanmar**. In both countries a combination of congested camp conditions and restrictions, freedom of movement and legal status have also been factors. This has resulted in opposition to livelihood interventions and investment in more sustainable infrastructure that could improve cost-effectiveness. Related issues are explored further under EQ11 and in the case studies in the annex.

DG ECHO's support CVA interventions contributed to cost-effectiveness. The HIPs highlighted the relevance of cash-based assistance while acknowledging the constraints listed above. Most projects using CVA included assessment data and response analysis that demonstrated the feasibility of CVA and the appropriateness of CVA as a modality.[114] DG ECHO has been very proactive in encouraging use of CVA by partners. Reports in **Bangladesh** of widespread reselling of in-kind assistance were seen not only as an indicator that beneficiaries had needs which were higher priority, but that local markets were being impacted. Based on interviews with host community representatives, reselling continues to be a problem although the ratio of CVA to in-kind assistance has increased since 2017 as it has been tackled by the relevant agencies involved with corrective measures.

Localisation, in the form of a significantly greater role of local actors, is almost certain to be a primary feature of the Rohingya operation in future. Such a trend could potentially offer advantages in the form of lower costs while at the same imposing additional risks, notably in terms of risks related to quality assurance, corruption and anti-terrorist compliance.[115] Protection has been a particular focus within the DG ECHO programme, and this has been an area where national and local NGOs in **Bangladesh** have faced challenges as their operating models relied on close working relationships with government.[116]

The EU regulations[117] limiting the funding to organisations registered in EU member states has had cost-efficiency implications. The EU regulation prevents DG ECHO from directly

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[113] Definitions of cost efficiency (*Efficient conversion of inputs into outputs*) and cost-effectiveness (*Achievement of intended outcomes in relation to costs*) are as per ADE - Pongracz, S. et al. (2017) Study on Approaches to Assess Cost-Effectiveness of DG ECHO's Humanitarian Aid Actions.

[114] HERE (2018), Real-Time Response Review of the Disasters Emergency Committee (DEC) Emergency Appeal for People Fleeing Myanmar: Responding to The Needs of Refugees and Host Communities - Review of the DEC Phase 1 Responses.

[115] Myanmar and Bangladesh ranked 130 and 146 respectively (out of 180) in Transparency International's 2019 Corruption Perceptions Index.

[116] Sida L. and Schenkenberg, E. (2019), Synthesis of Rohingya Response Evaluations of IOM, UNICEF and UNHCR.

[117] European Commission (2019), Humanitarian Aid Regulation (v. 26/07/2019) articles 7a & 7b. This regulation limits eligibility for financing to non-profit-making autonomous organizations who are registered in an EU Member State.

funding local NGOs. This implies to implement activities through a larger number of partners and multiple administrative layers, which generates higher transaction costs. DG ECHO's inability to directly fund national NGOs limits its options for reducing overhead costs. DG ECHO field offices have nevertheless supported capacity building of local stakeholders[118] and made efforts to ensure that the voices of local civil society actors were heard.

Cost effectiveness of DG ECHO's operating model

In a context of widespread humanitarian needs, DG ECHO has been relatively successful in leveraging its available funding and limited human resources to achieve a reasonable level of cost effectiveness. The funds available to DG ECHO did not allow significant contributions across multiple sectors but DG ECHO offices in both countries made efforts to leverage their funding to improve cost effectiveness. The ways in which DG ECHO has been able to leverage and optimise their value-added have been described in other sections of the report (see EQ7 and EQ8) but can be summarised as follows:

- Informing decision-making of other donors, including DG DEVCO, through sharing useful analysis, supporting coordination and joint advocacy approaches;

- Spreading funding across a relatively large number of partners and sectors to increase the quality of analysis and amplify advocacy has helped to justify the relatively high transaction costs; and

- Improvement in the accountability to affected populations directly through reinforcing protection and indirectly within the broader humanitarian community through provision of technical guidance, capacity building of national and promoting adherence to humanitarian principles.

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EQ11 Longer term planning

EQ 11	To what extent did DG ECHO manage to achieve longer term planning and programming to address the potential for protracted displacement of refugees and IDPs? To what extent have appropriate exit strategies been put in place and implemented?

The section below is also linked with the response to EQ6 above (Nexus).

Summary Response to EQ 11
- Prospects for a safe, voluntary, dignified and sustainable repatriation of Rohingya refugees to **Myanmar** remained dim**.** The massive influx into **Bangladesh** put significant pressure on local resources giving rise to social tensions between the Rohingya and host communities, notably reduction in unskilled labour wages, shrinking water tables and environmental destruction. These factors, together with the **Bangladesh** government's preference for an early return to Myanmar, has meant that local integration for the Rohingya has not been a viable option in the immediate future.   - DG ECHO has been able to support DRR using a longer-term perspective in both countries since the 1990s and has had some success in extending DRR programming to new camps established since the 2017 influx to help increase resilience in these fragile and disaster-prone areas.   - Restrictive policy environments in both countries have posed significant limitations on sustainable medium- to longer-term planning and programming targeted at

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[118]   Ibid.

displaced Rohingya communities. In this challenging context, DG ECHO's approach has been to advocate for increased funding for affected populations on both sides of the border that is proportionate to needs to support a coherent strategy that recognises the reality of a protracted crisis.

- DG ECHO has continued to advocate safe, voluntary and dignified returns to **Myanmar** and, together with DEVCO and EEAS, seek ways of operationalising the EU Nexus approach to create conditions conducive to such a return. The Nexus approach has shown itself as a useful lens for DG ECHO's longer-term planning.

- Limited progress has been made since the 2017 influx in moving towards more sustainable solutions for camp infrastructure in **Bangladesh**. Displaced populations in camps continued to be dependent on external assistance and DG ECHO has been obliged to allocate most of its resources to meeting short-term humanitarian needs DG ECHO has nevertheless managed to facilitate the work of development actors, mainly through real-time information sharing and analysis.

- Exit strategies for DG ECHO in both countries remained a remote prospect due to policy and operating environments that are presently not conducive either to a dignified return to **Myanmar** or to local integration in **Bangladesh**. The few examples of successful exits identified were in **Myanmar** where DG ECHO succeeded in handing over some activities to other donors, notably DG DEVCO. DG ECHO has continued to look for opportunities to advocate more sustainable interventions in which viable exit strategies can be considered.

Prior to the 2017 Rohingya crisis, DG ECHO's DRR activities in both countries were designed with medium- to longer-term objectives, which also included some collaboration with DG DEVCO.[119] As described above, the crisis has resulted in greater efforts by DG ECHO, DEVCO and the other sections of the EU Delegation to apply the Nexus approach to the Rohingya crisis so as to address the humanitarian and development needs of both displaced and host communities more effectively.

Restrictive policy environments for Rohingya communities in both countries have posed significant obstacles to implementing medium- to longer-term interventions targeted at displaced communities. In **Bangladesh**, the government's desire to promote return and minimise pull factors for the remaining Rohingya population in Myanmar resulted in opposition to moving from in-kind to cash-based assistance and a lack of livelihood options or formal education for the Rohingya. In **Myanmar**, the lack of clear legal status, an ongoing conflict and restrictions on freedom of movement of the Rohingya population has severely limited access to credit, services and markets. The result has been a high reliance on external assistance, mostly provided by the international community. DRR intervention options in camps have also been limited, due to the government's opposition to building more resistant and resilient infrastructure, including cyclone shelters and family shelters.

Although local officials have privately acknowledged that it is unlikely that the Rohingya population in the camps will return in the near or even medium term, the national policy toward the Rohingya remained focused on near-term repatriation to maintain pressure on **Myanmar** to make the changes needed to enable repatriation. The government has been worried about creating a pull factor that draws yet more Rohingya over the border.[120] The government in **Bangladesh** has tried to limit the humanitarian response to meeting the refugees' immediate needs and has discouraged efforts to develop multi-year planning, despite growing evidence of the need for more sustainable approaches.[121] It was difficult for DG ECHO and other agencies to address longer-term challenges such as building durable shelters to withstand the region's harsh monsoons, develop programmes to help

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[119] DG ECHO (2017), Mission Report. March 2017.
[120] International Crisis Group (2019) A Sustainable Policy for Rohingya Refugees in Bangladesh.
[121] Development Initiatives (2021) Supporting longer term development in crises at the nexus: Lessons from Bangladesh.

refugees become more self-reliant through education, create livelihood opportunities, and help host communities absorb the impact of the Rohingya population on the local economy.[122]

Although the stated goal of the government in **Bangladesh** since the beginning of the Rohingya crisis in 2017 has been for a dignified return as quickly as possible, the current consensus in the international community is that large-scale voluntary returns are very unlikely in the near future. Exit strategies for DG ECHO have been limited apart from some examples observed in **Myanmar** where other donors, including DG DEVCO, were persuaded to take over relevant interventions, while continuing to advocate for flexibility to implement more sustainable design options.

In collaboration with DG DEVCO and other development actors such as the World Bank in **Bangladesh**, DG ECHO has shown potential to translate into more coherent longer-term approaches in both countries, including support for joint evidence-based advocacy with the government. DG ECHO was among donors consulted by a World Bank-supported study[123] to assess the impact of the Rohingya influx in Cox's Bazar to develop a baseline for mitigation strategies and longer-term planning. DG ECHO's support to the Nexus work in **Myanmar** has similarly been focused on developing a common vision for protracted displacement scenarios, based on a shared analysis, and a principled framework for engagement.

At an operational level, DG ECHO has facilitated the work of development actors through real-time information sharing and analysis. Examples cited by key informants included feedback from camp level in **Bangladesh** *via* the BBC Media Action project and NGO platform, both of which are supported by DG ECHO, in addition to direct feedback from DG ECHO staff regarding relevant issues such as disruptions in internet and mobile phone services.

Given the political and environmental context, it appears likely that DG ECHO will face a delicate balancing act during the foreseeable future where it needs to make the most of its somewhat limited resources to make the most of opportunities to gather evidence and advocate for more sustainable solutions while continuing to ensure that basic humanitarian assistance and protection needs of vulnerable groups are met. In such an environment, sustainability will necessitate a continued focus on DRR and community resilience and ensuring that interventions are conflict sensitive.

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[122]   DG ECHO (2017), Mission Report. March 2017.
[123] Innovations for Poverty Action (2020) The Impact of Large-Scale Forced Displacement on Rohingya Refugees and Host Communities in Cox's Bazar, **Bangladesh**.

5.   CONCLUSIONS

This section presents conclusions emerging from evaluation findings and analysis. They are based on the findings presented under each EQ and the case studies for each of the two countries.

On addressing the needs of the most vulnerable

> **C1.DG ECHO support contributed to better addressing vulnerability by giving an increased attention over time to gender, education, and protection in its own support and through advocacy.**

The crisis resulted in a high degree of vulnerability for the Rohingya in both countries due to trauma, extreme violence, uncertainty, insecurity, a lack of freedom of movement and restricted access to livelihoods and basic services. In this context the increasing emphasis of DG ECHO on gender, education, and protection contributed to better addressing vulnerability, even if DG ECHO maintained a wider, multisector approach. DG ECHO did this also through its advocacy efforts, including by ensuring that community "voices" were captured and heard, notably in Bangladesh.

Based on EQ1, EQ8, EQ9 and Case Study 1

On the strategy for the crisis, the Nexus approach and sustainability

> **C2. DG ECHO's annual programming cycle was well-suited to meet lifesaving needs in the context of the Rohingya crisis, particularly during the initial phase of the response. DG ECHO lacked however a longer-term approach adapted to this protracted crisis, although good progress has already been made in this direction with the development of a Nexus action plan.**

While the stated goal of the government in **Bangladesh** has been for a dignified return as early as possible, the consensus was that large-scale voluntary returns to **Myanmar** were unlikely in the near future. In both Myanmar and Bangladesh the policy environments have restricted longer-term approaches that would be better adapted to protracted crises.

The Rohingya crisis demonstrated that DG ECHO's annual programming cycle is well-suited to dynamic operating environments to meet lifesaving needs, particularly during the initial phase of the response. Unlike most humanitarian agencies and the other humanitarian donors, DG ECHO lacked a multi-year strategy adapted to this protracted crisis that clearly articulated their role in the Nexus action plan under different scenarios. Restrictive policy environments in both countries have limited longer-term planning and the government in **Bangladesh** has discouraged multi-year planning so as to maintain a focus on its plan to promote voluntary repatriation. While DG ECHO continues to support a dignified return, lessons learned from other protracted crises have demonstrated the importance of taking a long-term perspective to improve the effectiveness, efficiency and sustainability of the response.

The Rohingya crisis provided a catalyst for more systematic collaboration within the EU Delegation in Myanmar and, since 2019, the Nexus approach for developing a joint response plan for both countries. A challenge faced in both countries has been that DG ECHO, DG DEVCO and the EEAS each have different systems, ways of working and lines of command and priorities that closer collaboration have helped to address.

DG ECHO funded actions have mainly looked at sustainability by preparing the ground for policy change when the opportunity arises. Nevertheless, the operating context and restrictive policy environments in both countries have posed significant limitations on

sustainable medium- to longer-term planning and programming targeted at displaced Rohingya communities.

Based on EQ2, EQ6, EQ8, EQ11 and Case Studies 1, 2, 3

On the proportionality of the budget to needs DG ECHO intended to address

C3. DG ECHO's budget was not proportionate to the needs they intended to address, notably at the onset of the crisis, and the rationale behind the level of funding decided by DG ECHO was not entirely clear. Yet, DG ECHO played a significant role in the response by serving the most pressing needs and filling service gaps as well as by providing its overall recognised experience and knowledge across many sectors.

DG ECHO allocated EUR 111 million to respond to the Rohingya refugee crisis between 2017 and 2019, three-quarter of which was attributed to Bangladesh. DG ECHO was amongst the top-5 contributors to the response plans in **Myanmar** and **Bangladesh**, but it was not sufficient to meet the needs that DG ECHO had intended to address, notably at the onset of the crisis in **Bangladesh**. Consequently, DG ECHO had to renounce funding some projects or project activities given the sheer volume of needs and magnitude of the crisis.

DG ECHO quickly established a presence in Cox's Bazar following the massive influx of Rohingya asylum seekers, but it took time for DG ECHO to increase funding to a significant level. Overall, the budget allocated to the Rohingya crisis remained well below the funding requested in DG ECHO's needs assessments. The evaluation did not find a clear rationale behind the level of funding decided by DG ECHO.

DG ECHO was nevertheless able to play a significant role in the response to the Rohingya refugee crisis. Good quality needs assessments and stakeholders mapping enabled DG ECHO to focus its response on priority as well as unserved areas and sectors. It invested considerable efforts in identifying the most relevant partners and adjusting funded interventions to match these needs. With comparatively modest budget, DG ECHO was still able to support interventions across sectors and position itself as a trusted source of information and analysis benefiting to other donors.

Based on EQ2, EQ6, EQ11 and Case Studies 2, 3

On the alignment with humanitarian principles and thematic/sector policies

C4. DG ECHO's strategies and approaches in both countries were aligned with relevant policy frameworks and thematic/sector policies.

DG ECHO's strategies and approaches in both countries were largely aligned with relevant policy frameworks and thematic/sector policies both in funded interventions and their advocacy. DG ECHO was widely acknowledged by stakeholders as a donor whose interventions and advocacy were guided by needs and humanitarian principles.

Partners receiving DG ECHO funding demonstrated a reasonable awareness of humanitarian principles and relevant thematic policies among DG ECHO partners in both countries, particularly with respect to gender and protection. This was apparent in the emphasis on a needs-based approach when designing and monitoring projects. DG ECHO consistently promoted humanitarian principles, although there was a perception that this hard-line principled approach sometimes impeded practical solutions for meeting needs of vulnerable groups.

Based on EQ4, EQ9 and Case Study 3

On the coordination of the response

C5. DG ECHO played an important coordination and advisory role for humanitarian donors in both countries in the unusual context of coordination being co-led by several organisations.

DG ECHO had a multi-faceted coordinated approach that combined support to UN, NGO, and Red Cross partners to implement a range of sectoral interventions. DG ECHO's support for NGO Platforms in both countries helped ensuring a consistent NGO "voice" in interagency coordination fora. DG ECHO's long experience in both countries prior to the 2017 influx combined with their field monitoring, technical expertise and their coverage of multiple sectors contributed to broad respect within the international humanitarian community.

Based on EQ5, EQ9 and Case Study 3

On coherence and value added

C6. DG ECHO provided added value to the overall response in both countries by using its in-depth understanding of humanitarian needs, analysis and advocacy to support an interagency response to the crisis and through its important coordination and advisory role.

DG ECHO was widely viewed as a well-informed and constructive donor that encouraged a coordinated approach.

DG ECHO's positioning within the international humanitarian community was supported by evidence-based analysis and a principled approach, aided by the fact that DG ECHO tends to be subjected to fewer pressures than bilateral missions. DG ECHO was seen as a humanitarian agency with a strong advocacy voice that did not shy away from sparking debates related to humanitarian principles and common advocacy positions on a range of issues, including camp closure, freedom of movement, humanitarian access and promotion of cash-based systems. EU Member States representatives felt they both benefited from DG ECHO's analysis and DG ECHO's informal convening role to discuss pertinent humanitarian issues.

DG ECHO had a multi-faceted coordinated approach that combined support to UN, NGO, and Red Cross partners to implement a range of sectoral interventions. DG ECHO support to improving communication with communities, notably in **Bangladesh**, and NGO Platforms in both countries helped to ensure that community and NGO "voices" were heard during interagency coordination. DG ECHO's long experience in both countries prior to the 2017 influx combined with their field monitoring, technical expertise and their coverage of multiple sectors contributed to broad respect within the international humanitarian community.

Based on EQ5, EQ7, EQ9 and Case Study 1

On results obtained

C7. DG ECHO interventions generally achieved their objectives in terms of coverage of targeted beneficiary populations, and meeting Sphere standards in the nutrition and WASH sectors.

The analysis of the project sample found that most DG ECHO interventions achieved their objectives in terms of coverage of targeted beneficiary populations. The quality of partner reporting on other KPIs was variable, but available data indicated that Sphere standards had been met for nutrition and WASH sectors.

DG ECHO's focused support on protection was viewed by stakeholders as a critical contribution in improving the humanitarian community's awareness of protection issues and vulnerability more generally. DG ECHO partners have mostly adapted and applied the mainstreaming of GBV in their actions in line with relevant policies.

Based on EQ1, EQ3, EQ5, EQ 8, EQ9 and Case Studies 1, 3

On advocacy and communication

C8. DG ECHO's advocacy has influenced humanitarian stakeholder approaches and interventions but has struggled to achieve the broader impact needed outside the humanitarian sphere.

DG ECHO focused its advocacy efforts on improving AAP and community-based protection approaches, contributing to improve the information required to deam better with humanitarian access, which has been a particular challenge in Myanmar. DG ECHO actively supported developing joint advocacy in both countries to ensure consistent messaging to governments and other key stakeholders, although policy environments in both countries have limited the success of joint advocacy initiatives.

DG ECHO's advocacy was mainly based on humanitarian principles, respect for IHL, rights-based and conflict-sensitive approach and policy dialogue. DG ECHO's analysis and advocacy messages have resonated less with stakeholders outside the humanitarian sphere although DG ECHO's proactive engagement in operationalising the Nexus approach for the Rohingya crisis in both countries has helped improve this understanding and interactions with development actors. The issues highest on the agenda were to promote dignified and sustainable solutions for displaced communities while laying the ground for durable solutions in a complex geo-political environment. Promoting cohesion between ethnic groups and between displaced and host communities has been an important focus where DG ECHO has been able to contribute through its DRR interventions. However, many of these issues extend beyond DG ECHO's mandate and areas of expertise, illustrating the strategic role of joint advocacy as an integral component of the Nexus approach.

Based on EQ1, EQ2, EQ3, EQ5, EQ9 and Case Studies 1, 3

On localisation

C9. The approach by DG ECHO Myanmar and Bangladesh to localisation and NGO coordination has been innovative but was *ad hoc* rather than strategic.

DG ECHO field offices have used innovative approaches to advance localisation in both **Myanmar** and **Bangladesh** to increase the role and voice of national stakeholders. Constrained by their regulations to only being able to fund humanitarian agencies who are registered within the EU, DG ECHO field staff have attempted to advance localisation through a variety of means. This included the design of DRR activities in camps and host communities, supporting NGO coordination systems with funding, technical advice, capacity building and facilitating the involvement of national NGOs in international coordination systems. As the need for a scale-up rapid response has passed and budgets become more limited, national civil society actors will play an increasingly important role during the next phase of the Rohingya response and, in fact, restricted humanitarian access in **Myanmar** had already accelerated this trend.

DG ECHO's support to NGO coordination systems has been particularly effective in helping to ensure that NGO "voices" are adequately represented in coordination fora, and information generated by these NGO systems has informed DG ECHO's own contextual analysis. NGO coordination systems have however not been able to promote collaboration as much as expected, particularly in **Bangladesh** where the NGO platform

(that comprises of national and international NGOs) had been politicised and fragmented in large part by competition osver resources.

Based on EQ1, EQ2, EQ5, EQ11

On cost-effectiveness

C10. DG ECHO has taken steps to encourage cost-effectiveness among its partners but, despite examples of cost-effective behaviour, partners have been inconsistent in applying guidelines and their attention to cost effectiveness.

In **Bangladesh** and **Myanmar**, the evaluation team found several examples of cost-effective behaviours by DG ECHO and partners. DG ECHO's efforts to improve cost-effectiveness focused on the selection stage of interventions to avoid duplicating efforts while encourage synergies and coordination.

At the same time, attention of DG ECHO partners to cost effectiveness was variable, including an inconsistent approach to the 2019 DG ECHO reporting guidelines that were revised with the intention of enabling DG ECHO to assess the cost effectiveness of the partner's actions more easily. With few exceptions, there was little evidence that an overall cost analyses had been conducted at a project or programme level that documented insights into costs and benefits of viable options that could justify the choices made. A primary cost driver for many of the DG ECHO-supported interventions has been partner staff costs and, together with the relatively high unit costs of the Rohingya operation that seems likely to extend over many years, on DG ECHO is destined to increase.

DG ECHO has been relatively successful in leveraging its available funding and limited human resources in both countries to achieve a reasonable level of cost effectiveness. Spreading funding across a relatively large number of partners and sectors to increase the quality of analysis and amplify advocacy helped to justify the relatively high transaction costs with such an approach.

Based on EQ8, EQ10, EQ11, Case Study 2

6. RECOMMENDATIONS

Five strategic recommendations targeted at DG ECHO, both at a country and at a regional/HQ level, are listed below. Each recommendation is linked with a conclusion with the corresponding number above. Recommendations are strategic and forward-looking. They take into consideration the current context of the Rohingya crisis, including the influence of the COVID-19 pandemic, recognising that humanitarian assistance to meet basic needs will still be required for the foreseeable future.

Participants in the workshops on the draft final report validated the relevance of the recommendations, although, due mainly to restrictive policy environments in both countries, participants felt that many of the recommendations would be more likely to be achievable as part of a longer-term strategy. This underlined the importance of DG ECHO developing multi-year strategies for each country to support the Nexus Rohingya action plan.

R1 *DG ECHO offices in Bangladesh and Myanmar* should develop a scenario-based multi-year strategy to that aligns with the Nexus joint response plan and HIPs for each country. It should be adapted to the specific context in each country, using external facilitation and technical support as required. Specific actions that could support this include:

- More clearly DG ECHO's role and contribution in the multi-year strategy based on their position and strength for each country including DG ECHO's expertise and reputation in DRR, analysis, protection mainstreaming and humanitarian networking.

- Incorporate scenario-planning so that contingency plans are in place to adapt to changes, including making the most of opportunities that arise to move forward with strategic objectives.

- A joint advocacy strategy supported by a stakeholder map.[124]

- A communication strategy for internal and external stakeholders to encourage support and promote engagement by external stakeholders, notably ECHO partners who will have an important role to play in implementation.

- A learning component that would periodically capture and share learning relevant to both country and global levels.

This joint EU strategy[125] should be scenario-based include conditionalities in terms of support from the relevant governments and mitigating actions to be taken should such support not be forthcoming.

R2 When deciding on funding allocations, *DG ECHO HQ* needs to:

- **Improve the timeliness of fund allocations** to support DG ECHO operations during the initial phase of an emergency following a large-scale displacement.

- **Ensure that DG ECHO offices in Myanmar and Bangladesh continue to receive sufficient funding** to engage successfully in a multi-sector strategy and continue to address persisting humanitarian needs. To main its legitimacy and continue their role as a key facilitator and influencer in the Rohingya crisis to the response, DG ECHO's budget should be sufficient to have the flexibility to fund strategic interventions and respond to emergencies and ensuring significant contributions across sectors.

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[124] An example of a component of such a strategy would be to contribute to ongoing work by the World Bank and others to build an evidence-base for the potential benefits for host communities of CVA mechanisms for displaced populations with the long term objective of leveraging support for national social security systems for host communities and displaced populations.

[125] The 2020 EU Action Document for "Responding to the needs of the Rohingya population in Cox's Bazar, Rakhine State and host communities in Bangladesh" provides a useful foundation.

- **Clarify the rationale for funding levels**, notably by making the criteria used to define the budget size more explicit and demonstrating the links between funding and the objectives DG ECHO intend to address.

R3 *DG ECHO* should continue their innovative approaches at both a country and global level to promote localisation.

DG ECHO offices in Bangladesh and Myanmar should continue their innovative approaches via its funding and technical support to NGO coordination to ensure that NGOs continue to have an important "voice" within the humanitarian community while also creating incentives for collaborative actions. Specific actions could include continuing to promote NGO coordination through encouraging joint action between NGOs to address concrete common objectives and challenges that are best addressed collectively, which can help to justify the additional transaction costs of collaboration.[126]

R4 *DG ECHO offices in Bangladesh and Myanmar* should further **improve the effectiveness of its advisory and advocacy role** by building upon their areas of strength by:

- **Identifying and filling, either directly or via partnerships, gaps in the evidence base** about impacts on displaced and surrounding communities that better supports their objective of promoting sustainable interventions;[127]

- **Apply a multi-year "lens" when reviewing/revising DG ECHO's advocacy strategy for the Rohingya crisis** (link with R.1) to guide investments of time and funding to advance strategic priorities. Indicators could be developed to monitor whether advocacy messages and media resonated with stakeholders being targeted, notably host governments and decision makers in DG ECHO HQ. A communication strategy, including with affected populations, should be developed. Effectiveness of advocacy could be improved by identifying the best means to deliver messages to different stakeholders.

R5 *DG ECHO offices in Bangladesh and Myanmar* should **improve attention to cost-effectiveness of interventions** for the Rohingya crisis by:

- **Continuing to support AAP**, notably through continued support to community-level joint complaints and feedback mechanisms ensuring that relevant community feedback is taken into account when reviewing project design and implementation.

- **Promoting application of improved cost-effectiveness systems and approaches** both within its own programme and amongst the wider humanitarian community by:

- **Promoting peer learning** between partners to encourage sharing and adoption of good practice.[128]

- More systematic inclusion of cost-effectiveness considerations during regular programme review-related activities. Examples could include cost driver analyses, comparisons with benchmark unit costs, funding different types of partners, consortia versus individual partners and transfer modality options.[129]

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[126] Baker, J. (2014), Humanitarian capacity-building and collaboration: lessons from the Emergency Capacity Building Project.

[127] Examples could include be EU to strengthen the evidence base for ways of better integrating Rohingya in Bangladesh into the host economy while at the same time improving the wellbeing of nationals – see IPA (2020) The impact of large-scale forced displacement on Rohingya refugees and host communities in Cox's Bazar, Bangladesh

[128] IRC, an ECHO partner throughout the Rohingya crisis, has been developing and testing approaches at a global level to improve cost effectiveness for its own humanitarian programmes and sharing lessons learned. See, for example, IRC and USAID (2019), Cost-Efficiency Analysis of Basic Needs Programs: Best Practice Guidance for Humanitarian Agencies.

[129] See ADE (2016), "Study on Approaches to Assess Cost-Effectiveness of DG ECHO's Humanitarian Aid Actions" for additional guidance.

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