



REPLIES OF THE EUROPEAN COMMISSION TO THE EUROPEAN COURT OF AUDITORS' SPECIAL REPORT

on **Commission support to fight hunger in
Sub-Saharan Africa**

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This document presents the replies of the European Commission to observations of a Special Report of the European Court of Auditors, in line with Article 265 of the [Financial Regulation](#). These replies are to be published by the European Court of Auditors together with the Special Report.

I. THE COMMISSION REPLIES IN BRIEF

Food and nutrition security remains a strategic priority for the European Union's external action, in line with its global commitment to the Sustainable Development Goals and the 2021-2027 programming cycle. In Sub-Saharan Africa, the Commission supports both emergency responses to acute food crises and longer-term action to address the structural causes of food insecurity and malnutrition. For this, it uses a combination of humanitarian, development and peacebuilding instruments, tailored to the situation in individual countries and coordinated with the EU member States.

The international food security architecture is increasingly fragmented, with a proliferation of overlapping initiatives promoted under different presidencies, global summits and alliances. Each G7 or G20 cycle often brings new proposals, which tend to accumulate rather than consolidate. The result is a risk of duplication, donor fatigue and weak institutional memory.

The Commission welcomes the European Court of Auditors' (ECA) report and broadly concurs with its findings. The report rightly highlights the multidimensional nature of hunger and the complexity of delivering effective and sustainable responses in fragile and crisis-affected environments. While acknowledging the progress achieved, the Commission also recognises that more can be done to strengthen the design, targeting, monitoring and long-term impact of its interventions.

The Commission agrees on the need for greater transparency in the prioritising of countries and regions for development support (Recommendation 1). It is committed to documenting context-sensitive criteria for targeting, balancing vulnerability with operational feasibility. It also acknowledges the importance of strengthening project design (Recommendation 2) by, for example, paying greater attention to structural causes and sustainability, and ensuring more inclusive community engagement, while retaining flexibility for local adaptation.

The Commission fully endorses the objective of reinforcing the humanitarian-development nexus (Recommendation 3). It is actively promoting inter-departmental coordination and integration of the peace dimension. However, it emphasises that effective implementation depends on political conditions and institutional capacity in partner countries. Ensuring complementarity between actions may often be more feasible than pursuing fully integrated strategies.

Improving monitoring and reporting systems (Recommendation 4) is also a shared priority. The Commission is enhancing project oversight through risk-based monitoring and clearer verification requirements. It agrees on the value of better indicators, including outcome indicators where feasible, but underlines the need to adjust expectations to fragile, volatile settings. It also supports the development of a common donor methodology for tracking food and nutrition-related funding, while recognising the challenges of harmonising approaches across institutions and sectors.

On sustainability (Recommendation 5), the Commission is committed to embedding transition strategies in project design, strengthening local ownership, and promoting long-term results. It recognises the need for more systematic post-project assessments where conditions allow.

Throughout its response, the Commission stresses that EU action must remain responsive to local contexts and integrated within broader strategic priorities, including the Green Deal, Global Gateway, and Farm to Fork strategies. The shift towards sustainable food systems reflects the EU's vision for long-term transformation even if impacts may take time to show. Nutrition remains a core priority, as reaffirmed at the Paris Nutrition for Growth Summit. Increasingly, it is mainstreamed throughout EU investment, using multisectoral approaches and innovative financing tools.

Finally, the Commission appreciates the ECA's positive observations, including its recognition of the valuable contributions delivered by EU-funded projects. It remains committed to continuously improving the effectiveness and impact of its external action to fight hunger and malnutrition in Sub-Saharan Africa, while taking account of the diversity and fragility of the contexts in which it operates.

II. REPLIES TO THE RECOMMENDATIONS

Recommendation 1: Strengthen targeting and document the criteria applied to prioritise development support for fighting hunger

The Commission should establish and document clear criteria for targeting the most relevant geographical areas and needs, taking into account the different contexts in which the support is provided. These should also take account of available data on the root causes of chronic or acute food insecurity and malnutrition at country and regional level.

(Target implementation date: 2027)

The Commission **accepts** recommendation 1.

The Commission agrees on the importance of greater transparency in the prioritising of development support to address food insecurity and malnutrition. It recognises the need to use available data on root causes and to clarify and document-targeting criteria.

The Commission intends to improve transparency by developing a typology of food insecurity situations – ranging from chronic food insecurity to different types of food crises, including famine – and documenting context-adapted targeting approaches. This will be based on existing global tools, such as the Global Report on Food Crises, and will take account of vulnerability, feasibility, operational constraints and long-term sustainability.

Recommendation 2: Strengthen the design of development projects

The Commission should:

Recommendation 2(a): strengthen the link between project design and the underlying structural causes of food insecurity and malnutrition by developing a flexible and context-sensitive typology of response options tailored to different crisis contexts, complemented by guidance on how to assess projects' cost-effectiveness;

(Target implementation date: 2027)

The Commission **accepts** recommendation 2(a).

Recommendation 2(b): actively engage local communities in project design to ensure interventions are aligned with relevant needs and to enhance long-term sustainability.'

(Target implementation date: 2027)

The Commission **accepts** recommendation 2(b).

Recommendation 3: Strengthen the implementation of the humanitarian-development-peace nexus

The Commission should ensure that all relevant directorates-general and services are involved in adopting a comprehensive nexus strategy at country level. In addition, the Commission should involve partner countries, where feasible, in preparing joint context analyses and action plans to improve complementarity between humanitarian and development interventions, while also considering the peace dimension. These should include clearly defined roles, responsibilities and coordination mechanisms.

(Target implementation date: 2027)

The Commission **accepts** recommendation 3.

The Commission fully supports the objective of strengthening the humanitarian-development-peace (HDP) nexus in line with 2024 Council conclusions, ‘Stepping up Team Europe’s support to global food security and nutrition’¹, and it recognises the importance of more coordination between relevant EU departments. At the same time, it stresses that developing joint context analysis and strategy development with national authorities is not always feasible, particularly in fragile or conflict-affected environments, where institutional legitimacy or political debate may be lacking. However, like in the Sahel where the EU is adapting its engagement, this could be done through renewed political dialogue and other forms of national, regional and international engagement.

The Commission considers that implementing the HDP nexus requires a strong political engagement, consistency across EU external action instruments, and adequate resources. In the current environment, structural constraints limit the capacity for fully integrated country-level strategies. While joint analysis and planning are desirable where feasible, a pragmatic approach based on complementarity, flexible sequencing, and regular information-sharing often proves more effective in complex crisis contexts. The Commission will continue to tailor its nexus engagement to specific country situations, ensuring complementarity across humanitarian, development and – where relevant – peacebuilding interventions.

Recommendation 4: Reinforce the Commission’s monitoring and reporting framework

The Commission should:

Recommendation 4(a): strengthen project oversight by carrying out risk-based field visits. This should involve prioritising resources for such visits based on specific risk factors, such as the nature and complexity of projects, their level of funding, the past performance of the implementing partners and security and logistical constraints. The Commission should also systematically request and review supporting documents from implementing

¹ ‘The Council reiterates the critical need to strengthening the Humanitarian-Development-Peace (HDP) Nexus approach in prevention and response to food insecurity, which is essential for breaking the cycle of food and nutrition crises, particularly in fragile and conflict-affected contexts’ - Stepping up Team Europe’s support to global food security and nutrition - Council conclusions (16 December 2024)
<https://data.consilium.europa.eu/doc/document/ST-16901-2024-INIT/en/pdf>

partners to strengthen its verification of key data included in progress reports, particularly regarding number of beneficiaries supported and equipment provided;

(Target implementation date: 2027)

The Commission **accepts** recommendation 4(a).

The Commission supports risk-based field visits, and the systematic review of supporting documents provided by implementing partners, as part of a strengthened oversight approach. However, such field visits are subject to available resources and operational conditions, including security issues.

Recommendation 4(b): enhance logical frameworks by focusing more on identifying appropriate outcome indicators that align with project objectives, and prioritise the establishment of baselines prior to project implementation;

(Target implementation date: 2027)

The Commission **accepts** recommendation 4(b).

The Commission agrees on the need to improve logical frameworks, including the use of baseline data and outcome indicators. However, in fragile or highly volatile contexts, baseline setting may be unfeasible and outcome monitoring may lack reliability or validity due to data, security concerns, and practical obstacles such as restricted mobility, lack of local capacity, and difficulties in linking results to specific actions. In such settings, output indicators remain the most appropriate type of indicators for performance tracking.

Recommendation 4(c): propose to other donors the development of a common methodology for measuring funding related to food security and nutrition, to ensure consistency in reporting, improve transparency regarding projects' financial contribution to various sectors, and report on progress made by 2027.

(Target implementation date: 2027)

The Commission **accepts** recommendation 4(c).

The Commission notes that in the case of food security and nutrition, parallel reporting frameworks — based on purpose-specific methodologies — are currently required due to their inherently cross-cutting nature and should not be interpreted as standard sectoral allocations. Therefore, the Commission fully supports the development of a common donor methodology for measuring food and nutrition-related funding and report on progress made by 2027.

Recommendation 5: Enhance the sustainability of projects

The Commission should require development projects to include a well-defined context-sensitive strategy to reinforce local systems and capacities in a sustainable manner. The Commission should also strengthen its framework by assessing, where appropriate, the sustainability of projects 6 months to 1 year after their completion.

(Target implementation date: 2027)

The Commission **accepts** recommendation 5.

The Commission agrees that sustainability must be a core design criterion for all development projects. The shift towards long-term impact and local ownership is already embedded in key EU policy frameworks, notably the Farm to Fork strategy, the European Green Deal, and the Global

Gateway strategy. These frameworks promote sustainable food systems and enhanced engagement with local actors, including the private sector.

However, the Commission notes that in fragile or crisis-affected contexts, a traditional ‘exit strategy’ is often not feasible or meaningful. The primary objective in such settings is to strengthen resilience and reduce dependency over time, rather than to fully phase out support. Similarly, conducting sustainability assessments 6 to 12 months after project closure is desirable, but may not always be possible or relevant due to logistical, security or resource constraints or due to the crisis context.

The Commission will continue to encourage the inclusion of realistic transition strategies and, where feasible, promote follow-up assessments after project completion.

III. REPLIES TO OBSERVATIONS

1. Targeting of EU support²

The Commission agrees with the ECA on the importance of transparent and evidence-based targeting of development assistance to address food insecurity and malnutrition. However, the Commission stresses that targeting approaches must remain context-sensitive and tailored to the specific EU mandates and instruments. Targeting decisions must balance vulnerability, feasibility and institutional realities. The Commission is working to improve the way it documents its targeting logic, including through the use of global tools such as the Global Report on Food Crises.

2. Monitoring and results frameworks³

The Commission shares the ECA’s view on the need to strengthen project monitoring. Risk-based field visits and systematic document verification are being promoted across EU Delegations. However, the Commission notes that outcome-level indicators and baseline data are often not feasible in fragile or volatile contexts. In such settings, output indicators remain the most reliable and appropriate performance metric. The Commission agrees to continue improving logical frameworks, while maintaining flexibility so that it can adapt to different operating environments.

3. Nutrition reporting and strategic visibility⁴

The Commission wishes to clarify its nutrition reporting methodology. All funding marked with nutrition policy marker 1 (significant objective) or 2 (principal objective) is reported in line with the guidance from the Development Assistance Committee of the Organisation for Economic Cooperation and Development (OECD DAC). This approach aligns with those of other major donors and ensures transparency without overstating investments. It is important to distinguish between ‘nutrition objectives’ and direct ‘nutrition investments’. Furthermore, while the ECA notes the relatively low visibility of nutrition in the political agenda, the Commission reaffirms its commitment to addressing the root causes of malnutrition. Nutrition remains a central objective of the EU’s human development approach, as reaffirmed at the Paris Nutrition for Growth (N4G) Summit. Through initiatives such as Global Gateway and the Human Development Guarantee, the EU continues to support health and nutrition infrastructure, food systems and basic service delivery at community level.

² See ECA paragraphs 36-47.

³ See ECA paragraphs 59-72.

⁴ See ECA paragraphs 30-31 and 68.

4. Nexus implementation and coordination constraints⁵

The Commission acknowledges the ECA's call for stronger coordination between humanitarian and development actors at country level. It agrees that joint context analysis and planning can help improve the complementarity of responses. However, such coordination remains difficult to institutionalise in fragile or crisis-affected settings, where operational conditions are volatile, and local authorities may lack the legitimacy or capacity to engage meaningfully. In practice, flexibility and pragmatic coordination often take precedence over rigid joint frameworks.

The Commission also points out that effective HDP nexus implementation requires not just coordination mechanisms but also sustained political commitment, institutional leadership and adequate financing. The lack of a shared, long-term framework can limit the scope for concrete joint programming and strategic alignment.

5. Sustainability in crisis contexts⁶.

The Commission agrees that sustainability must guide all EU-supported interventions. However, in fragile and crisis-affected environments, traditional exit strategies may prove impossible to implement. The primary goal in such contexts is to strengthen local capacities and resilience over time. The Commission encourages realistic transition planning during project design and promotes sustainability assessments where feasible. However, such evaluations may not always be possible due to access, security or resource constraints. The EU's broader policy frameworks – including the European Green Deal, Farm to Fork strategy, and Global Gateway – provide strong incentives for sustainable, locally owned solutions.

6. Use of data sources for prioritisation⁷.

The Commission relies on the Global Report on Food Crises (GRFC) as well as on the Integrated Food Security Phase Classification and Cadre Harmonisé (IPC/CH), including nutrition indicators, as its primary references for prioritising interventions. These frameworks, developed with EU support, enable evidence-based programming and coordinated responses across stakeholders. In this context, the Commission advocates for the use of enduring, multilateral coordination tools – such as the *Global Report on Food Crises*, which the EU helped initiate and continues to support – to ensure that data, analysis and targeting remain consistent over time and across actors. The Commission therefore considers the GRFC and its IPC/CH foundation as the indispensable global reference frameworks and is committed to maintaining and further strengthening these common tools.

⁵ See ECA paragraphs 48-58.

⁶ See ECA paragraphs 73-85.

⁷ Cross-cutting reference to the Global Hunger Index (see for example paragraph 85 of the ECA report).