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European development NGOs and the diversion of aid:

Contestation, fence-sitting, or adaptation?

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Abstract

Motivation: The paper examines the advocacy strategies used by European non-governmental development organisations (NGDOs). The literature on development aid has not put much emphasis on understanding the aid-related advocacy strategies of NGDOs, and the literature on interest groups has so far paid little attention to explaining why these select different advocacy strategies within the same policy area.

Purpose: The paper aims to explain how NGDOs have selected advocacy strategies during the process of reformulating the European Consensus in 2016/17, in response to the European Union's attempts to divert aid from poverty reduction to three other goals: managing migration, funding climate change adaptation, and funding the private sector.

Approach and methods: Using insights from the interest group and social movements literatures, the paper develops a framework explaining NGDO strategy selection, looking at the politicization of the policy change, its impact on NGDOs' funding, and its relation to the groups' normative positions. The paper uses qualitative data from NGDO documents and interviews with senior staff and advocacy officers of NGDO networks based in Brussels.

Findings: NGDOs used very different strategies for the three cases of aid diversion: they contested aid diversion for managing migration; mainly choose fence-sitting in case of climate change adaptation; and gradually became more adaptive towards diverting aid to fund the private sector. The paper shows that the three variables of politicization, impact on funding, and relation to normative positions explain the strategies selected by NGDOs in all three cases.

Policy implications: The findings can help NGDOs in selecting the most appropriate advocacy strategies for changes in aid policy, and can thus become more effective in influencing the EU institutions and member state governments.

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Introduction

Non-governmental development organizations (NGDOs) play a key role in international development. NGDOs not only implement aid projects in less developed countries, but they also shape the policies of donor and recipient countries through their advocacy. NGDO networks, as well as other non-state actors like epistemic communities and social movements, have been instrumental in forcing the World Bank to apply environmental and social safeguards (Park, 2005), convincing donors to cancel the debts of some of the most heavily indebted poor countries (Busby, 2007), or mainstreaming gender into the EU's development policy (Elgström, 2000).

Despite their significance and impact, however, the literature has paid relatively little attention to understanding how exactly NGDOs engage in policy advocacy, and how they select their advocacy strategies. NGDOs have a variety of advocacy strategies at their disposal, including direct or indirect approaches, the use of different lobbying techniques (e.g. building media presence, protest activities, publications, hiring commercial consultants), as well as the particular framing of the message that they want to convey to donor officials. It is unclear, however, why NGDOs choose a specific advocacy strategy for a certain issue, and not another one. The literature on interest groups provides some pointers for understanding how groups select their advocacy strategy, such as the resources to which the group has access; the intensity of conflict around the issue; the stage of policy development; or the characteristics of the policy area under consideration. Much of this literature is, however, based on cross-sectoral comparative studies, and thus the determinants of how interest groups select strategies within a single policy area, and how they react to shifts within it, are not yet addressed. There is a lack of evidence from more fine-grained case studies, especially in the field of international development.

This article contributes to filling this gap by examining how European advocacy NGDOs have reacted to shifts in the EU's international development policy regarding the uses and purposes of aid to developing countries. There have been several recent attempts by donors, including the European Commission, to shift the focus of international development policy away from poverty reduction to

other goals. These goals have included the securitization of aid, using aid to fund climate change adaptation and mitigation, funding the for-profit private sector, and most recently, managing migration. While reactions to aid securitization have received relatively widespread academic attention, the other three shifts have not been addressed. The paper examines how NGDOs have reacted to these three diversions of aid, focusing on the window of opportunity provided by the revision of the European Consensus on Development in 2016/17. Accepted in 2005, the European Consensus served as the main framework for the EU's international development policy for more than a decade. However, changing global and internal circumstances, including the United Nation's adoption of the Sustainable Development Goals (SDGs) in 2015, necessitated the review of the Consensus, the process for which was launched in May 2016 with an online public consultation (European Commission, 2016c). The New European Consensus on Development was accepted in mid-2017.

The article identifies the advocacy strategies used by NGDOs in relation to the three diversions of aid during this revision process, and uses insights from the literatures on interest group and social movements to develop a framework to explain their choice of strategy. Using qualitative data collected from NGDO documents and interviews with senior staff of NGDO networks based in Brussels, we find evidence that the strategy selected by NGDOs is determined by how politicized the policy shift is, how it affects NGDO funding, and how it relates to NGDO normative positions. In particular, we show that diverting aid to managing migration, an issue characterized by a high degree of politicization, which negatively affects the groups' access to resources and goes against their normative beliefs, provokes advocacy strategies focusing on contestation. In the case of climate change adaptation, which has medium to high political salience, but no clear impact on groups' resources and is consistent with their normative positions, fence-sitting strategies are most likely, with room for adaptive elements. Finally, private-sector funding, which causes a reduction in the availability of groups' resources, and NGDOs have related normative concerns, can lead to contestation, but this is limited by the issue's low politicization, leaving room for more constructive strategies, including recommendations on *how* the EU should involve private actors in development.

The advocacy and lobbying work of NGDOs has been neglected in the literature on interest groups, and has received relatively little attention in the development aid literature. The findings of this paper suggest that the policy context on the macro level is not a sufficient factor to explain NGO advocacy strategies, as groups can use different strategies for different policy changes in the same policy area. Focusing on a single policy area and single type of organization, the paper removes a number of well-known sources of variation in strategy selection, allowing for a more fine-grained analysis of micro-level determinants, thus enriching the literature on the study of interest groups. The development aid

literature has tended to conceptualize NGDOs as normative agents who strive for policy change based on 'what they believe is right' (see Elgström, 2000). However, it has generally neglected the fact that NGDOs are also beneficiaries of the 'aid business', and are likely to act like any other interest group: they will lobby for policies which benefit them and ensure their survival (Bloodgood, 2011).

The next section discusses the policy context, which is followed by a literature review and analytical framework section, providing insights into how NGDOs select advocacy strategies. The subsequent section presents the empirical results, while the final section offers concluding remarks.

The policy context

Since the early 2000s, the EU has made strong attempts to cast itself as an aid donor driven by enlightened self-interest, focused on the 'eradication of poverty in the context of sustainable development' (European Union, 2006, p. 2). Focusing the EU's international development policy on poverty reduction had a number of practical implications: EU aid should be spent in the poorest countries, or countries with large numbers of people living in poverty, and it should focus on actions aimed at relaxing constraints that perpetuate poverty in sectors like healthcare, education, and rural development (Ghosal, 2013). While it was difficult to ensure that the EU's practice lived up to its commitment, many have nonetheless regarded the EU as a donor with a strong poverty focus (Carbone, 2011).

Aid can, however, serve a number of purposes and donor interests, and thus donors often face incentives to divert aid for goals other than poverty reduction (Hoeffler & Outram, 2011). Given the pressure on government budgets, increasing the volume of official development assistance (ODA) has proved difficult in the aftermath of the global economic crisis (Heinrich et al., 2016), and thus governments have viewed diverting existing aid from poverty reduction to more acute challenges as the only possibility to respond to these.

The EU's international development policy has not been immune to aid diversion. The securitization of EU aid, which refers to the increasing usage of aid to promote security objectives as opposed to poverty reduction, has received extensive attention in the literature (Keukeleire & Raube, 2013; Furness & Gänzle, 2016). Three other diversions have received much less academic scrutiny: diverting aid from poverty reduction to climate change adaptation/mitigation, private-sector funding and managing migration.

Given the increasing challenges of climate change, donors have been under pressure to support adaptation and mitigation efforts. The 1992 UN Framework Convention on Climate Change (UNFCCC) mandated rich countries to provide support for actions to address climate change in poor countries, and at the Copenhagen climate talks in 2009, donors committed to mobilizing USD 100 billion of additional funding per year by 2020 (Brown et al., 2010). However, given the weaknesses in defining what exactly constitutes climate aid, donors have the possibility to 'repackage' their existing aid commitments and thus divert these from poverty reduction (Stradelmann et al., 2011).

Promoting the greater involvement of the for-profit private sector in development has also been seen as a diversion of aid. The Agenda for Change, a strategic update on the European Consensus in 2011, argued for deploying a higher percentage of EU aid to leverage private resources and thus increase impact (European Commission, 2011, p. 8). The Commission later elaborated this goal in more detail (European Commission, 2014), and in 2016 it announced the European External Investment Plan to encourage investment in Africa and the EU Neighbourhood (European Commission, 2016a). The plan aims to provide investing companies with equity, grants and guarantees, with the goal of leveraging funds for development. The impact of these on poverty remains unclear.

Managing migration became an EU foreign policy priority after the 2015 refugee crisis (Castillejo, 2017). While aid, through the reduction of poverty, may reduce the push factors for migration in sending countries in the long term (Berthélemy et al., 2009), the EU looked for more immediate solutions, for example by using aid to improve the border-control and migration systems of recipient countries, with the goal of 'tightening' borders. In 2016, the EU promised €6 billion in aid to Turkey, in exchange for readmitting migrants and tighter controls along the Aegean coast (Collett, 2016). In 2015, the EU created the Emergency Trust Fund for Africa, with the goals of fostering stability in the region and better migration management (European Commission, 2017). While the fund officially aims to address the root causes of migration, critics have argued that the EU is using it to buy African countries into tighter cooperation on return and readmission. Many of the trust fund's projects have focused on border, security and irregular migration management activities, and while these can have a positive impact on poverty, this is by no means automatic (Cangas & Knoll, 2016).

European NGDOs have repeatedly made it clear that the goal of ODA should be sustainable poverty reduction, in the spirit of the European Consensus and the SDGs. In 2016, the EU began a process of revising the European Consensus, and this provided NGDOs with a window of opportunity to influence the future of EU development policy. A public consultation was launched in May 2016, and almost 200 NGDOs and other actors submitted opinions. Taking these into account, the Commission published a

communication on the new development framework in November 2016 (European Commission, 2016b).

NGDOs voiced strong concerns about aid diversion. Advocacy was led by CONCORD, the European NGDO community's main platform for engaging the EU institutions, comprising national-level NGDO federations and pan-European networks, such as Oxfam, Save the Children, or CARE. CONCORD (2016a) argued that 'aid should stay focused on poverty reduction and sustainable development and should not be diverted or diluted for any reason'. Individual NGDOs also engaged in advocacy. Oxfam stated that 'risks […] identified in the proposal for the new Consensus relate to the use of private finance and the blending of public and private funds'. It went on to argue that 'the EU-Africa Trust Fund, […] and the External Investment Plan are all aiming at stopping migration to Europe. They are shifting European development and foreign policy from the goal of poverty eradication towards serving the self-interest of the EU' (Oxfam, 2016a). Solidar demanded 'that eradicating poverty and fighting inequality should be kept as the main focus of EU development cooperation policy. Therefore, development funding should not be used for migration management […], or to subsidise the private sector' (Solidar, 2016a).

However, there have been strong imbalances in the reactions of NGDOs: they have universally derided the diversion of aid to managing migration, but have been less vocal about aid diversion to climate change adaptation. While they have called on the EU to stop subsidizing the private sector, they have not ruled it out completely (CONCORD, 2016a). There is clear indication of different advocacy strategies in the three instances of aid diversion.

Explaining the advocacy strategies of NGDOs

When it comes to the analysis of the advocacy strategies (i.e. approaches and techniques used to promote a group's perspective and reach outcomes it sees as favourable within policy processes; Greenwood 2017), the interest groups literature offers a number of insights. Interest organizations can approach policy-makers directly (for example by participation in consultations, hearings or working groups) or through the use of media and public pressure, recognized as indirect tactics (Beyers & Kerremans, 2012). Beyers and Kerremans (2007) and Dür and Mateo (2016) provide evidence that diffuse interests (e.g. citizen groups, which would include NGDOs) typically choose indirect tactics. When they do use direct lobbying, their relative lack of resources allows them weaker access in comparison to specific interests (e.g. business organizations; Dür & De Bièvre 2007). Esing et al. (2015) further argued that when directly involved in the policy-making process, diffuse interest organizations

active in distributive policy areas (such as the environment, welfare, or development) are much more active at the agenda-setting stage as opposed to regulatory policy areas (Hafner-Fink et al., 2016).

Social movements represent a particular type of diffuse interest group. While advocacy-focused NGDOs have become professionalized lobbying organizations, they have strong roots within social movements. An important issue is the 'repertoire of action' which can be employed by social movements, ranging from routine and disruptive actions (such as strikes and demonstrations) to more violent tactics (Taylor & Van Dyke, 2004; Tarrow, 2011: 99). The literature reveals some important insights regarding how movements select specific tactics from their repertoires. Traditionally, they have revolved around the resources available to movements, and the strategic cost–benefit calculations they make when choosing between forms of collective action (Edwards & McCarthy, 2004; Poletta & Jasper, 2011). However, there is a clear understanding that this approach is unable to explain all strategic decisions, especially if one takes into consideration the complexity of goals which drive social movements. Indeed, Della Porta and Diani (2006: 179) argue that social movements face a number of conflicting motivations when selecting a strategy: they need to ensure that their actions convince the political authorities, generate public support, reward activists and meet the criteria of newsworthiness. These are not necessarily compatible goals (Rochon 1988: 109), and thus some of their actions may be more aimed towards creating solidarity within the movement, or raising the movement's profile, than achieving influence. Movements may choose more drastic, and 'innovative' strategies to gain media attention, but these may alienate supporters.

Beyond these trade-offs, there are further factors which limit strategic choices of social movements. Collective identity, for example, is a key issue (Poletta & Jasper, 2011): while creating collective identity is a tool of protest, movements cannot use strategies which are not compatible with their identities, beliefs, or the frames of meaning which they use to justify collective action (Taylor & Van Dyke 2004). Furthermore, social movements must also ensure that their actions do not erode their legitimacy or other moral resources. There is also a clear understanding that more organized forms of social movements will turn towards institutionalized forms of collective action, such as lobbying and political campaigning, and will avoid confrontational protests (Taylor & Van Dyke 2004).

Most of the literatures on interest groups and social movements are based on cross-sectoral (i.e. different policy areas) and cross-type (i.e. diffuse vs. specific interests) comparative studies, and thus the determinants of how the same type of groups/movements select strategies within a single policy area, and how they react to shifts within it, are not addressed. Klüver (2011) is an exception: using quantitative methods, she found that the polarization of issues within a policy area explains certain strategic choices. Detailed case-study evidence is, however, missing.

This paper focuses on the advocacy strategies groups select when facing a change within the policy area of their interest. In terms of possible advocacy strategies, we adapted the classification of Guéguen (2007), who organized lobbyists' strategies into four types: negative, defensive, reactive, and pro-active. Unlike other classifications, his assessment also included no activity as a strategic choice, where groups decide to do nothing. Guéguen's classification thus makes it possible to expand on existing conclusions in the interest groups literature and ask what stops groups from acting on issues of importance for them.

Contestation strategies come in two forms. Negative strategies focus on opposition, blocking and refusing proposed changes. Their main characteristic is a lack of suggesting constructive ideas. Similarly, *defensive strategies* focus on obstruction, delaying and a negative stance towards any proposed changes. However, their cause of the opposition is motivated by the protection of previously established solutions. In both cases, the aim is stopping, or in other words 'killing' the proposed policy change. As both strategies are expressed in practice through *contestation*, we collapse them into this single category. The contestation of proposed policy changes is not in itself a bad thing. Often, within the intensive EU policy-making process, groups do not have time to work out their positions, thus contestation is the only way to delay the process. Groups may also hope to raise awareness on the perceived inappropriateness of EU actions, build a coalition around their position, and pressure the EU into abandoning the proposed change (Murdie & Urpelainen, 2015). Contestation allows groups to raise their profile: they can initiate mass campaigns, issue press releases and opinion papers or take part in televised debates, which can lead to increased funding and visibility (Heaney, 2004). Groups will argue that the position adopted by the EU is wrong, either based on moral reasoning, or the material and reputational harm that the EU is causing to various constituents. They will, however, be less visible in producing constructive ideas, as their main goal is to kill the policy change.

Fence-sitting strategies (which Guéguen interchangeably also calls *reactive* strategies) are based on waiting and having no defined strategy to respond to proposed changes. These strategies are rarely considered in the interest group literature: the prevailing assumption is that groups will take action if the policy area is of interest for them (Kresi et al., 2007), but there are clearly situations when the policy area is among the group's concerns, yet they remain passive. Fence-sitting strategies are characterized by a distinguished lack of position papers or other activity. Most authors link such cases to a lack of resources (Beyers & Kerremans, 2007). Guéguen (2007), however, suggests that groups may lack anticipation and will wait before acting, to see how the proposals play out. Groups may also be stuck in decision-making deadlocks, which can especially be the case for umbrella groups with diversified membership. Alternatively, groups may lack financial or staff capacities for more elaborate

activity, or may face strong competition from other stakeholders. They may also aim to avoid conflicts with the EU institutions (Maloney et al., 1994).

Pro-active adaptation strategies are constructive, anticipatory, based on the pursuit of acceptable solutions (by the creation of multi-type stakeholder alliances; Klüver, 2011), and put forward credible arguments. Contrary to the two previous sets, these strategies aim to provide a constructive solution which will be acceptable to a larger number of actors. Consensus building is key, as well as the creation of coalitions with other actors; thus groups will also need to adapt and make concessions by adjusting their original stands on the particular policy shift.

The selection between these three broad strategies (*contestation, fence-sitting and pro-active adaptation*) may depend on a number of variables. Given that the paper examines the reactions of one specific group of actors (European NGDOs) in one specific aspect of a policy area (what ODA is used for), characteristics of interest groups and the policy area (issues identified in the literature review at the beginning of this section) are constant among the three cases and thus cannot be a source of variation in the dependent variable. Variation thus needs to come from the characteristics of the policy shifts. Using further insights from the literature, we identify three such characteristics which may have an impact on NGDO strategy selection: (1) the degree of politicization around the proposed policy change; (2) the impact of the policy change on NGDO funding; and (3) how the policy change relates to the ideological and normative positions of NGDOs.

Politicization. While interest organizations often deploy a mixture of insider and outsider tactics (Binderkranz, 2005), there seems to be an agreement that the selection between the two is highly dependent on the issue under consideration. In particular, Beyers (2008), Klüver (2011), Helbling and Tresch (2011) concluded that different organizations intensify their lobbying efforts around issues which are highly politicized. High degrees of politicization imply a greater degree of conflict around the issue, greater polarization, and more entrenched views (see Eising et al., 2015). When an issue is highly politicized, traditional policy-making structures (direct access to policy-makers) become less central for interest groups, and other ways to seek influence attain more importance (Binderkrantz, 2005; Mahoney, 2007). Thus, there is usually a shift from direct consultation to more outside lobbying strategies, such as the use of media and creation of public pressure (Della Porta & Diani 2006). The groups usually disadvantaged in the use of insider lobbying strategies will replace them with looking for mass public alignment in their favour and address the media more often than other actors (Netjes & Binnema, 2007). These strategies are generally linked to a more conflictual approach and contestation.

A high degree of politicization is also associated with urgency, meaning that NGDOs might not have time to work out constructive solutions, and may choose contestation to delay changes. Contesting highly politicized issues also allows NGDOs to engage in debates, ultimately raising their own profile. The politicization of the three cases of aid diversion varies greatly. Undoubtedly, the issue of migration has a very high degree of politicization in Europe, especially since the 2015 refugee crisis. The politicization of climate change is relatively lower. Although Europeans are clearly concerned about it (Eurobarometer, 2017), it does not figure as strongly in everyday political debates as migration does. Using aid to fund the private sector has remained largely a topic within the aid profession, with minimal politicization (c.f. Moravcsik, 2002).

Impact on funding. The interest group literature argues that it matters how salient a topic is for groups (Klüver, 2011). One way of looking at how salient a policy shift is for NGDOs is to examine the impact it would have on their access to funding, and there is a significant stream of literature examining the relationship between NGDO funding concerns and advocacy (Schmid et al., 2008; Mosely, 2012). NGDOs work in an increasingly competitive funding environment and need to ensure their organizational survival (Sanchez Salgado, 2017). Many NGDOs, especially smaller ones, are highly reliant on grants from their national governments and the EU institutions (Nunnenkamp & Öhler, 2012). Given how NGDOs typically implement poverty-reduction focused projects in developing countries, they will see attempts to divert aid away from poverty reduction as a threat to their own access to funding, and may choose contestation strategies to oppose it. If the impact of aid diversion is unclear or neutral on their funding, they may choose more pro-active approaches or fence-sitting respectively. The impact on NGDO funding is clearly the strongest in case of diverting funds to the private sector, as NGDOs will then have to compete with private firms to obtain funding. In case of managing migration, aid is diverted from issues in which NGDOs have expertise to topics like border management, where they do not. Perhaps the impact of aid diversion to climate change adaptation is the least clear, as the distinction between climate aid and poverty-focused aid can be blurry (Stradelmann et al., 2011). Installing solar panels in villages, for example, can serve both climate change adaptation and poverty reduction. Many NGDOs involved in implementing poverty-focused projects can plausibly be involved in climate change adaptation projects as well, but it is also possible that this diversion of aid will benefit environmental groups instead.

Relation to normative positions. Another approach to look at the salience of a policy shift for NGDOs is to examine how it relates to their normative positions. While focusing on funding concerns sees NGDOs as rational agents, they can equally be conceptualized as actors driven by normative goals (Finnemore & Sikkink, 1998). NGDO normative goals relate to reducing poverty, empowering local communities, and putting the respect for human rights at the centre of development (CONCORD,

2012). These goals are key for NGDOs in terms of maintaining their credibility, legitimacy, building a collective identity and attracting activists and grassroots funding (Poletta & Jasper, 2011; Tarrow, 2011), as this is how they are able to differentiate themselves from other actors in the development system. Thus, it is difficult for them to go against this normative standpoint, and the more inconsistent a policy shift is with it, the more likely NGDOs are to contest it. Using aid to manage the flow of refugees and migrants is strongly against the normative/humanitarian motivations of NGDOs, who argue that refugees and even economic migrants need support. In fact, they see migration as a way of promoting development (CONCORD, 2016b, p. 26-27). In terms of private-sector funding, NGDO normative positions are coherent with initiatives that support poverty reduction, but at the same time they are suspicious of private firms' motivations. Chasing profits is not seen as compatible with poverty reduction (CONCORD, 2016b, p. 28). Finally, funding for climate change adaptation is highly compatible with NGDO positions, as they acknowledge that poverty reduction needs to be environmentally sustainable.

Data and methods

In order to analyse how issue politicization, impact on funding and relation to normative positions influence NGDO strategy selection, we collected data from two sources. First, we carried out qualitative text analysis on a number of written sources, with the aim of identifying signs of the various strategies. These sources included the responses to the EU-led consultation on the New European Consensuses by CONCORD and the most important NGDOs with EU-wide networks (12 in total, including organizations like Act Alliance, Médecins Sans Frontières, SDG Watch or Caritas). The responses of national-level NGDOs were excluded from the analysis, as these should appear in the aggregated views of the EU-wide networks. We also excluded the responses of other non-profit organizations, such as think tanks. The consultation responses were complemented by further NGDO publications and press releases, which had direct relevance to the New European Consensus (27 in total). As most of the NGDO advocacy was carried out by CONCORD, the majority of documents analysed were publications by this group.

Second, a total of 11 follow-up, qualitative interviews were carried out with senior experts working in EU advocacy roles at diverse Brussels-based NGDOs. We approached EU advocacy officers from CONCORD and all major NGDO networks present in Brussels; the total pool of potential interviewees was 18. Interviewees were asked open-ended questions about their advocacy priorities, how they view the three policy shifts, and how they engage in related advocacy. A list of interviews appears at the end of the article, however, interviewees remain anonymous for reasons of confidentiality.

This data-selection approach provides a thorough and representative picture of the European NGDO community's views, for three reasons. First, given that CONCORD is the central advocacy body of the community, its publications provide a representative, common-denominator view of the NGDOs' positions. Second, while there may be differences in emphasis among the groups, there seems to be general agreement on condemning aid diversion. Third, the point of theoretical saturation was reached relatively quickly during the data-collection and analysis process, and relatively few major points emerged from the interviews which were not covered in the documents. While a potential limitation of our data-collection approach may be that certain, more peripheral NGDO voices, were missed, there is little evidence that these had actually entered the debate.

The qualitative data from the documents and the interviews was first categorized along the three policy shifts. Then, we coded the data with the aim of identifying the characteristics of contestation, fence-sitting and proactive strategies in each of the three shifts.

Strategy selection in the three policy shifts

Managing migration

The qualitative analysis of NGDO documents is summarized in Table 1, which presents the key NGDO messages for the three instances of aid diversion. In order to avoid repetition, the table only includes a selection of the documents analysed, focusing on the more important/visible ones. Below, we discuss the findings from this analysis, coupled with the findings from interviews.

We find strong evidence that NGDOs have mainly opted for contestation strategies in case of diverting aid for migration management. As shown in Table 1, migration management clearly became a key issue for NGDOs after 2015, and the majority of documents argue strongly against it. Most interviewees agreed that combating the diversion of aid for managing migration has been the single most important element of their advocacy work during 2016-17 (INT#01, INT#02, INT#04, INT#05, INT#08), showing the high salience of the topic for NGDOs. Three themes emerge on the content of NGDO advocacy which provide evidence for contestation.

Table 1. Results of the qualitative analysis of key NGDO documents

Document	Diverting aid to manage migration	Diverting aid to fund climate change adaptation	Diverting aid to fund the private sector
CARE consultation response (2016)	Argues that it is counterproductive (p. 12) and harms human rights (p. 17). No alternatives provided.	The EU should massively scale-up climate finance to poor countries (p. 10).	Argues for transparency and clear legal criteria (p. 19)
CISDE/FTAO (2016)	Not mentioned	Importance of sustainability in general, but no mention of climate finance (p. 1)	Not mentioned
CONCORD (2012)	Not mentioned, only in terms of counting refugee costs as aid (p. 20). Brief mention of migration concerns driving aid to some regions (p. 9)	Strongly emphasized. Climate funding needs to be additional (p. 5). Constructive solutions: systems for monitoring (p. 6), new financing possibilities (p. 28)	Briefly mentions that private sector aid should be focused on poverty reduction (p. 13)
CONCORD (2013)	Not mentioned, only in terms of counting refugee costs as aid (p. 22)	Climate funding must be additional (p. 57.) Reminds donors of existing commitments. Constructive solutions: definitions and accounting mechanisms (p. 22)	Many critical mentions of private sector involvement and arguments against it. No constructive solutions.
CONCORD (2014)	Not mentioned, only in terms of counting refugee costs as aid (p. 15)	Constructive solutions: definition of “new and additional climate finance” (p. 6). States that climate funding is important (p. 17)	Argues against it (ineffective and risks harm, p. 18). Some constructive solutions, but these are vague.
CONCORD (2015)	Mainly discussed in terms of refugee costs (p. 31-33). Shows how some countries are using aid to manage migration (p. 19).	Argues that double counting climate finance is wrong, but provides constructive solutions (p. 6)	Argues against it (ineffective and serves EU interests, (p. 11). Some reference to principles that should be respected, but these are vague (p. 15).
CONCORD (2016a)	Argues that it is wrong: Strong language of denial (p. 4). No alternative solutions	Not mentioned explicitly, only the need to mainstream sustainability across all development policies (p. 2);	Argues against it and voices concerns, but no constructive solutions (p. 3).
CONCORD (2016b)	Argues that it is wrong, but some constructive elements (developing a positive narrative on migration and addressing root causes, p. 9). Some examples, but mostly vague.	No direct mentions.	Argues that it is not the best way to reduce poverty (p. 40). The way it is done is problematic (p. 33). Some constructive solutions, but no details.
CONCORD (2016c)	Argues that it is wrong. Recognises the urgent need to deal with the migratory pressures, but does not provide any solutions (p. 15).	Entire section devoted to climate finance (p. 24). Main focus on how climate finance is reported, with a number of constructive details.	Argues against it (ineffective and non-transparent, p. 20-21). Some hints at adaptation: "welcomes open and more inclusive partnerships" (p. 22)
CONCORD (2016d)	Mentions migration, but not in terms of aid diversion (p. 7).	Mentions additionality briefly (p. 6)	No clear opposition, some vague criteria on how it should be done (p. 4)

CONCORD (2016e)	Argues against it (moral reasons, p.2.)	Not mentioned	Not mentioned
CONCORD consultation response (2016)	Argues that it is wrong, aid should not have migration related conditionality attached to it (p. 20). Some general principles on alternatives.	Importance of supporting climate change adaptation and mitigation in general, no specific mention of aid diversion (p. 14).	Argues it is problematic, and if done, development effectiveness principles should be applied (p. 22).
Oxfam (2016b)	Argues that it is wrong (aid is not an appropriate tool, serves EU interests and harms the poor, p. 7)	Emphasizes the need for additionality; some constructive solutions (p. 6).	Does not question the need for private sector funding, but sees the EU's practice as problematic. Mentions constructive solutions (p. 8).
SDG Watch consultation response	Argues that it is wrong, aid should not have migration related conditionality attached to it (p 19). Vague mentions of creating a new narrative.	General mention of how the EU must fulfil its financial commitments on addressing climate change (p. 10)	Argues for clear boundaries for public funding of private development initiatives and strict conditionalities (p. 27).
Solidar (2016b)	Argues that it is wrong (p. 3). Some constructive solutions on using aid to tackle root causes of, but no details (p. 4).	Not mentioned	Argues against it. Some constructive proposals regarding transparency (p. 3).

Note: the table only provides a selection of the documents analysed.

Source: compiled by the authors

First, NGDOs contested the diversion of aid to migration based on the material and reputational harm that the EU is causing. Oxfam (2016a) argued that the EU's policies are primarily serving its own interests at the expense of the global poor. CONCORD (2016c, p. 20) echoed these sentiments, arguing that the EU is forgetting the 'poorest populations in low- and middle-income countries'. Others argued that by using foreign aid to manage migration, the EU is bribing developing countries, compromising its own position as a normative power (INT#03). These arguments resonate strongly with NGDO normative positions, and show that much of the NGDO opposition to diverting aid to managing migration can be explained as a matter of principle.

Second, there were strong arguments that managing migration through aid is ineffective, as it only provides short-term solutions without addressing the factors causing migration (European Commission, 2016c; Oxfam, 2016b; INT#01; INT#06). While some NGDOs agreed that migration needs to be managed, they argued that migration aid should be additional to poverty-reduction efforts (INT#02). Poverty-focused aid is needed to address the root causes of migration (Solidar, 2016a, p. 4; INT#10), but existing aid levels are too low (INT#03).

Third, NGDO publications used rather strong language and usually did not provide constructive ideas, they simply called on the EU to cease using aid for managing migration (Table 1). According to CONCORD (2016c, p. 4), 'development assistance should not be diverted to assist Member States in managing migration and there should be no conditionality of aid based on border control, managing migratory flows or readmission agreements'. Or, according to Oxfam (2016b, p. 2), 'tackling migration is not an objective for development aid'. Denial of the shift in these statements was strong, but few details of viable alternatives were presented. Addressing the root causes of migration was mentioned on several occasions (see Solidar, 2016b), but this was very seldom elaborated in detail. CONCORD (2016b, p. 9) argued that 'we urgently need to develop a new, positive narrative on migrants and refugees', but there is little evidence that NGDOs actually began working on such narratives.

These three themes are consistent with a contestation strategy. Contestation strategies are also expected to produce highly visible advocacy, which was compounded by the fact that diverting aid to migration management happened relatively quickly and outside the normal EU decision-making processes, thus NGDOs had few other ways to express their contestation than through the media. Visible advocacy also shows the high politicization of the topic. CARE and Save the Children, for example, initiated a joint letter calling on member states to reject the EU's position on migration, which was signed by 140 organizations and received media coverage (INT#04). Oxfam and CONCORD started an extensive viral social media campaign (INT#08). CONCORD's annual AidWatch Reports also visibly dealt with the topic, and CONCORD published 22 press releases, statements and reports mentioning it

between mid-2015 and mid-2017. Pan-European networks provided support and training for their national-level members to engage in campaigns in their domestic media (INT#05; INT#10), which was seen as crucial, given that the agenda of diverting aid for migration was driven by the member states (INT#04, INT#05, INT#07, INT# 08).

This visible advocacy is clearly in line with a contestation strategy, and was aimed at killing the policy shift. There is evidence, however, that despite contesting the policy shift, NGDOs did not want to lose out from funding. Some groups, while expressing their disagreement with aid diversion for migration, nonetheless bid for funding from the EU Emergency Trust Fund for Africa, although they argued that they did so to 'change the policy from within' (INT#04; INT#08).

Climate change adaptation and mitigation

As shown in Table 1, discussions on climate funding were present in NGDO publications well before the review of European Consensus. Most NGDOs agreed that climate adaptation funding constitutes a diversion of aid, and climate finance needs to be additional to existing aid commitments (INT#10; CONCORD, 2010, p. 13). However, most indicated that the topic has not been an important part of their advocacy (INT#01, INT#04, INT#08, INT#09; see also Table 1), or that they did not work on it (INT#03, INT#06), showing that its salience for the groups is lower than that of migration. Several publications by CONCORD dealt with the topic or mentioned it (a total of 17 between mid-2015 and mid-2017), so it is difficult to argue that there was no advocacy on it at all.

Two themes emerge from the data. First, from a normative perspective, NGDOs agreed with the need to ensure that development is sustainable. NGDOs have not worked traditionally on environmental issues or climate change, and had a poor understanding of these (INT#01). With the shift in the global development system due to the SDGs, however, they have been forced to take these issues into greater consideration, and incorporate them into their normative position. Many in CONCORD were originally sceptical about climate finance, but by the time of the consultation on the New European Consensus, they acknowledged that development and climate change need to be better integrated (INT#09), as poverty reduction is impossible without taking environmental sustainability into account (INT#07). This normative position is clearly reflected in the NGDO documents (e.g. CONCORD 2016c).

Second, the nature of NGDO advocacy was very different in the case of climate adaptation than in the case of migration management. Most of the NGDO publications focused on technical issues related to accounting climate aid, with the goal of avoiding double counting and separating climate aid and poverty-focused aid (CONCORD, 2011, p. 5; 2014, p. 6; 2016c, p. 25). Double counting by donors made

it very difficult for NGDOs to gauge the exact extent of aid diversion. Due to this technical focus, NGDO advocacy did not aim to generate mass mobilization, which may be an indication of the topic's lower degree of politicization. CONCORD's consultation submission (European Commission, 2016c) barely mentioned that climate funding is a diversion of aid, and instead argued for greater coherence between EU policies to promote sustainable development.

Despite the topic entering CONCORD's advocacy, most agreed that the pushback from NGDOs against diverting aid to fund climate change adaptation has not been strong (INT#09). NGDOs saw aid diversion for climate finance as less problematic in terms of normative positions, which explains why their advocacy has been weaker (INT#05; INT#09). The additionality of funds to existing aid commitments seems the key element in NGDO advocacy, which shows that funding concerns most definitely mattered for these groups. NGDOs seem to perceive environmental groups as competitors for funding (INT#03, INT#09, INT#05), and there is very little cooperation with them (INT#01, INT#02, INT#05). While there may have been an informal division of labour between the Climate Action Network, the main umbrella group for environmental NGOs, and CONCORD, integrated lobbying did not happen (INT#10).

Thus, advocacy on diverting aid for climate change adaptation has been rather reactive, with few NGDOs taking part (Table 1). CONCORD's advocacy, while focusing mostly on technical issues, shows some signs of pro-active adaptation, so it is difficult to label it a pure fence-sitting strategy. NGDOs have made a number of proposals on how climate finance accounting needs to be reformed. In general, however, they perceived it to be a less problematic diversion than migration management and they also had strong, better funded competitors in environmental groups, with whom they failed to develop partnerships.

Private sector

Funding the private sector by diverting aid has generally been seen as the second most salient topic for NGDOs after diverting aid for migration (INT#01). This is seemingly contradicted by the relatively few mentions of the topic in CONCORD's press releases (only 13 between mid-2015 and mid-2017), but one must bear in mind that this is the least politicized among the three diversions of aid. Most NGDO advocacy was rather clear that they were not against greater involvement of the private sector in development *per se*, but they had a number of issues with how the EU was doing it (Table 1).

Several themes emerge. First, many argued that the EU has been rather vague in its definition of what constituted the private sector. NGDOs agreed with supporting private actors, especially small firms

and agricultural smallholders in the partner countries, but were more sceptical about the ability of aid to leverage investments from European firms. Second, they argued that the development objectives in private-sector projects were rarely reached and the leveraging effect was minimal (INT#03; INT#07; INT#09). Funding the private sector was not seen as good value for money in terms of reducing poverty (CONCORD, 2016a, p. 3;2016b, p. 40), and some interviewees argued that NGDOs have a better understanding of reducing poverty than profit-oriented firms (INT#11). Third, some expressed their opinion that greater engagement with the corporate sector would bring an unhealthy competition for EU funding (INT#02). Fourth, NGDOs were concerned that private-sector funding often suffered a 'total lack of transparency, accountability and regulatory frameworks' (CONCORD, 2016a, p. 3), which could actually undermine sustainable development, especially in the context of fragile states, which are the focus of the European Investment Plan (CONCORD, 2016b, p. 40).

These arguments show evidence that NGDOs were afraid of losing funding, but also had normative concerns about greater private-sector involvement, especially regarding its ability to reduce poverty. NGDOs clearly have serious reservations, which meant that most of CONCORD's early advocacy focused on contestation. However, this contestation was mainly restricted to CONCORD's publications, and was not visible to the broader public, indicating that the politicization of the issue was low (INT#03). Some in CONCORD have been very dogmatic and against all for-profit private-sector involvement in development (INT#07). This stance, however, gradually shifted, and NGDOs instead started advocating for the EU to set clear principles on how it does private-sector funding (INT#10).

In 2017, CONCORD published a report with ten recommendations/principles on how to do private-sector funding well, which clearly indicated a shift towards pro-active adaptation (CONCORD, 2017). These principles included ensuring that such funding has the 'right aims', i.e. clear poverty-reduction objectives (Oxfam, 2016b, p. 8; INT#04; INT#05), and that it needs to be 'done well' to ensure there are no human rights abuses, as 'no one wants to repeat the scandals associated with the private sector funding programmes of the multilateral development banks' (INT#08). This means that principles of development effectiveness, such as transparency and accountability, need to apply to private-sector funding (CONCORD, 2014, p. 6), as well as a number of other conditions, such as ensuring corporations pay their taxes (CONCORD, 2017). The EU also needs to fund independent evaluations to determine the impact of private-sector development activities (CONCORD, 2016c, p. 23).

While recognizing the shift towards greater private-sector involvement, a clear funding-related motivation of NGDOs emerges from these principles: to ensure a level playing field and that private companies receiving funding conform to the same reporting and transparency criteria and implement

similar safeguards as NGDOs (INT#07). NGDOs have also argued that involving new actors in development should not come at the expense of 'traditional' partners (CONCORD, 2016c, p. 22).

Despite reservations and initial contestation, there is thus evidence of a shift towards more pro-active adaptation. Perhaps the most significant reason for this shift was the competition NGDOs faced in their lobbying. There was a clear push from member states for more private-sector funding (INT#03, INT#04, INT#09), many of which, even donors generally seen as highly poverty-focused, like the UK, have already been doing this in their own bilateral development policies. There is evidence that firms have also been lobbying the EU institutions for references to private-sector funding in the New European Consensus. Examples included European International Contractors (EIC), a body representing the European construction industry, Citi, a large multinational bank, and Microsoft. In its submission to the public consultation, EIC for example welcomed leveraging and blending, and argued that 'strategic alliances' are needed between donor agencies and commercial lenders/investors, in order to offer risk-mitigation instruments to investors (European Commission, 2016c). NGDOs would have clearly found it difficult to compete with such large, well-resourced organizations.

Conclusions

The article examined how European NGDOs select advocacy strategies, focusing on their advocacy related to aid diversion during the reformulation of the EU's international development framework. There have been attempts by the EU and its member states to divert foreign aid from poverty-reduction to goals like managing migration, funding climate change adaptation and supporting the private sector. The paper developed a framework to understand NGDO advocacy on these three topics, building on insights form the literatures on interest groups and social movements, and using variables related to how politicized the topic is, how it relates to NGDO normative positions, and how it affects their access to funding. The results are summarized in Table 2.

NGDOs opted for contestation in the case of migration management, with the goal of killing the proposal. Using aid to manage migration goes strongly against NGDO normative positions, which was potentially the single most important reason for explaining a contestation strategy. It also hurts NGDO access to funding, although some groups have managed to obtain funding from the EU's migration-related trust funds. The high degree of politicization around the topic provided NGDOs with strong incentives to enter the debates, allowing them to raise their profiles. In case of climate change adaptation, NGDOs were much more passive, and seem to have chosen a mixture of fence-sitting and proactive adaptation. The financial impact on NGDOs is less clear, and supporting Southern

communities in adapting to climate change is compatible with NGDO normative remits. The topic's lower degree of politicization, however, meant that confrontational strategies were unlikely to gather sufficient attention. Finally, funding the private sector hurts NGDO finances, but groups were unable to engage in successful contestation due to the almost total lack of politicization around the topic. Positions thus gradually shifted towards constructive adaptation, as there is room for compromise with NGDO normative positions.

Table 2. Summary of results

	Managing migration	**Climate change adaptation/mitigation**	**Private sector funding**
Issue politicization	High	Medium/high	Low
Impact on NGDO's access to funding	Decrease in available funds	Unclear	Decrease in available funds
Relation to NGDO normative priorities	Strongly against humanitarian, pro-human rights and poverty reduction positions	Compatible, but funds should be additional	Compatible, but private sector-led development must be driven by poverty reduction and aid effectiveness criteria
Expected NGDO response strategy	Contestation	Fence-sitting/Adaptation	Contestation/Adaptation

Source: authors.

The article has shown that NGDOs, and potentially interest groups more broadly, can use very different approaches to advocacy even within the same policy discussion. By focusing on a single policy area and one type of interest group, the article removed variables which have been argued to be significant determinants of advocacy strategies. The resulting micro-study enhances our understanding of interest-group behaviour and points to a need for more detailed consideration of how groups view policy changes. Due to the special nature of NDGOs, our results are not easily generalizable to other interest groups, but the framework could be employed to analyse strategy selection by other groups, especially ones characterized by strong normative positions (e.g. environmental or human rights organizations).

A further emerging issue relates to how group positions can evolve over time, with NGDOs gradually shifting from contestation towards adaptation in case of private-sector funding. The analysed documents came mainly from the agenda-setting stage of the policy process, and we assumed that this selection would help to control for different strategies deployed at various stages. Future research might consider issues related to timing in more detail. The relative politicization and salience of issues may change during the policy cycle, and the impact of these on advocacy strategies could be examined more explicitly.

Finally, the article has drawn attention to fact that there are important learning opportunities between the literatures on interest groups and on EU aid politics. The latter has mainly focused on member states, and has conceptualized NGDOs as normative policy entrepreneurs. However, as the article has shown, the drivers of NGDO behaviour are more complex, and there are a number of other actors engaged in EU development policy processes, including corporate actors and environmental groups. Creating a better understanding of the positions, motivations, and influence of these actors can be a fruitful avenue for future research.

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