

Findings and recommendations

This report presents the findings and recommendations of the 2023 peer review of Poland's development co-operation. Under the 2023 methodology, it does not cover all components of the DAC peer review analytical framework. It focuses instead on three areas of Poland's development co-operation that were identified in consultation with Poland's partners and government representatives.

After an overview of the current economic and political context, the report analyses Poland's institutional arrangements and the extent to which they are fit for purpose. It then considers Poland's bilateral programme, focusing on priorities and programming. The final section examines Poland's partnerships with multilateral and civil society organisations. For each of these areas, the report identifies strengths and challenges, the elements enabling Poland's achievements, and the opportunities or risks that lie ahead. The review also considers progress against the recommendations made in the last DAC peer review of Poland in 2017.

Context

Poland's political and economic context presents challenges and opportunities for its evolving development co-operation system

The Law and Justice (PiS) party have been in power since Poland's last peer review in 2017. Since then, the PiS has governed in coalition with two other right-wing parties, United Right and, until 2021, Agreement. Parliamentary elections were held on 15 October 2023, with a new government yet to be formed. Political debate on development co-operation has been limited, with a pause in the Foreign Minister's annual exposé to parliament between 2020 and 2023, and there is little parliamentary oversight of the development programme. This political context has made it challenging to raise development awareness and advance reforms to strengthen Poland's development co-operation system (MFA, 2023^[1]). Renewed political attention on Poland's Eastern neighbours driven by Russia's illegal war of aggression against Ukraine – a priority partner country of Poland – could offer an opportunity to better embed development co-operation considerations and standards into Polish policy objectives.

The Polish economy has proven resilient in the wake of COVID-19 and Russia's full-scale invasion of Ukraine, although growth is dampening as the war continues. Prior to the COVID-19 pandemic, the Polish economy was one of the fastest growing in Europe, expanding on average 3.7% per year in the decade preceding 2020. Per capita GDP has also continued to grow, nearing the European Union (EU) and OECD averages (OECD, 2023^[2]).¹ This presented a strong context for increasing official development assistance (ODA) in line with Poland's international commitments and for investing in more efficient and effective systems, as recommended in Poland's first peer review in 2017. While the economy recovered quickly from the COVID-19 pandemic, Russia's war in Ukraine is impacting economic growth. The most recent OECD Economic Survey of Poland points to the importance of strong governance and institutions, improving the investment climate, and strengthening public trust (OECD, 2023^[3]).

Poland's own democratic transition and tradition of solidarity have offered a narrative for its assistance to partner countries. Strategic documents recall Poland's status as a beneficiary of development assistance until 2004, positioning it well to provide relevant support to countries going through their own democratic transitions. The tradition of solidarity is also reflected in the Constitution, which obliges national institutions to meet the needs of the community and encourages all social actors to engage in mutual support both domestically and internationally (Government of Poland, 2021^[4]). This solidarity narrative continues to inform Poland's position in its region, evident in the impressive mobilisation of public and private resources to manage the inflow of around 1.5 million refugees to Poland from Ukraine (Government of Poland, 2022^[5]; UNHCR, 2023^[6]).

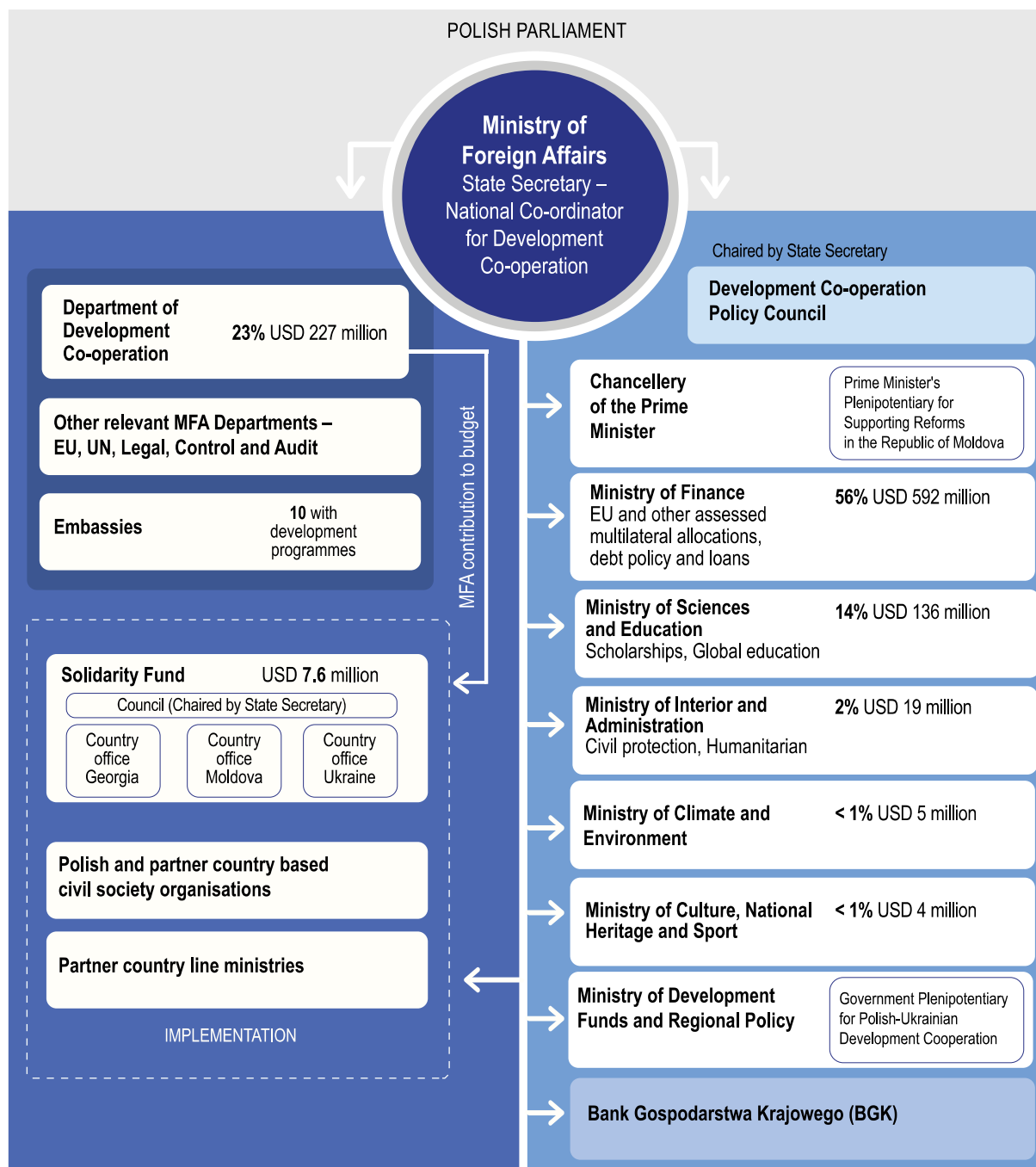
The Ministry of Foreign Affairs (MFA) remains responsible for co-ordinating Polish development co-operation. After joining the European Union in 2004, and as a Development Assistance Committee (DAC) member since 2013, Poland committed to delivering ODA according to international standards. The MFA is the lead institution for delivering on this, with responsibility for co-ordinating a range of actors. This includes the Ministry of Science and Education, responsible for scholarship programmes; the Ministry of Interior and Administration, responsible for refugee and migration policies and response; and the Ministry of Finance, which leads engagement with international financial institutions (Figure 1).

Recent crises are severely impacting Poland's priority partner countries

Ukraine and Belarus are the largest recipient countries of Polish ODA and, together with the Republic of Moldova, are long-standing priority partners. All three countries have experienced major political and geopolitical shifts in recent years, increasing need in the region. Moldova and Ukraine's candidacy status for EU accession, and the potential status for Georgia, are also increasingly framing the development co-operation context in each country, further driving the imperative for co-ordination.

Recent crises are an opportunity to trigger much-needed reform and investment in Poland's development co-operation system. Poland has not yet delivered on its aspirations in many important areas since its 2017 peer review. However, as both Polish Aid and the contexts in which it operates have been transformed, Poland now has an opportunity to reinvigorate its system for more effective co-operation. Building on recent innovations, the government can use the political engagement and momentum in countries such as Moldova and Ukraine to deliver on its reform ambitions to build a more coherent, efficient and well-co-ordinated system that delivers on Poland's strategic goals.

Figure 1. Overview of the Polish development co-operation system



Notes: EU: European Union; UN: United Nations. Volumes and shares refer to ODA disbursed by Polish government entities in 2020-21 as reported to the OECD. Source: OECD (2023^[7]), *OECD Creditor Reporting System*, <https://stats.oecd.org/Index.aspx?DataSetCode=crs1>.

Fit-for-purpose institutional arrangements

Poland’s legal and strategic framework provide a foundation for a whole-of-government development co-operation effort

The 2011 Development Cooperation Act establishes a clear ambition for Polish development and humanitarian assistance. It commits Poland to “support long-term social and economic development through actions to reduce poverty” (Government of Poland, 2011^[8]) and has been a useful tool for the MFA in building Poland’s development co-operation programme over the past decade. The act has been amended several times, most recently in 2020 to enable the MFA to delegate additional tasks related to humanitarian assistance to Poland’s Solidarity Fund (MFA, 2023^[11]).² Implementation of Polish ODA is also guided by a range of regulations, many of which are not specific to development co-operation, such as those governing funding to civil society organisations (CSOs). This complex regulatory framework sometimes constrains partnerships and could be streamlined (see Multilateral and civil society partnerships).

Multiannual programmes provide a framework for Polish development co-operation that is, in principle, owned across government. Adopted by the Council of Ministers in January 2021, the current programme, [Solidarity for Development \(2021-2030\)](#), is aligned with the 2030 Agenda and Sustainable Development Goals (SDGs) and reflects the “spirit” of the New European Consensus on Development (Government of Poland, 2021^[4]). Consultations were carried out with CSOs and across government, namely through workshops and the Development Cooperation Policy Council. Building on the previous programme, it articulates high-level thematic and cross-cutting priorities and Poland’s domestic and international commitments to effective development co-operation. Other parts of government reference the programme when discussing how their work contributes to Polish Aid.

Experience and expertise sit across different government institutions, enabling Poland to offer a broad range of relevant support to partner countries. Since 2011, Polish Aid has largely focused on supporting the democratic transition of Eastern Partnership countries. Partners continue to see this as core to Poland’s added value, particularly in Eastern Europe.³ The Solidarity Fund – founded as a repository of knowledge from Poland’s own democratic transition – has played an important role in delivering this, particularly at the local level (Box 4). A range of line ministries and related technical institutions are also involved in delivering development co-operation (Figure 1). This takes several forms: through the MFA’s annual internal call for proposals whereby line ministries apply for ODA funds for specific projects; through direct bilateral partnerships between Polish and partner country line ministries and agencies; and through Twinning and Technical Assistance and Information Exchange (TAIEX) initiatives (see Multilateral and civil society partnerships). Partner country officials and other stakeholders at country level value Poland’s ability to mobilise expertise across these different policy areas relevant to its own democratic transition.

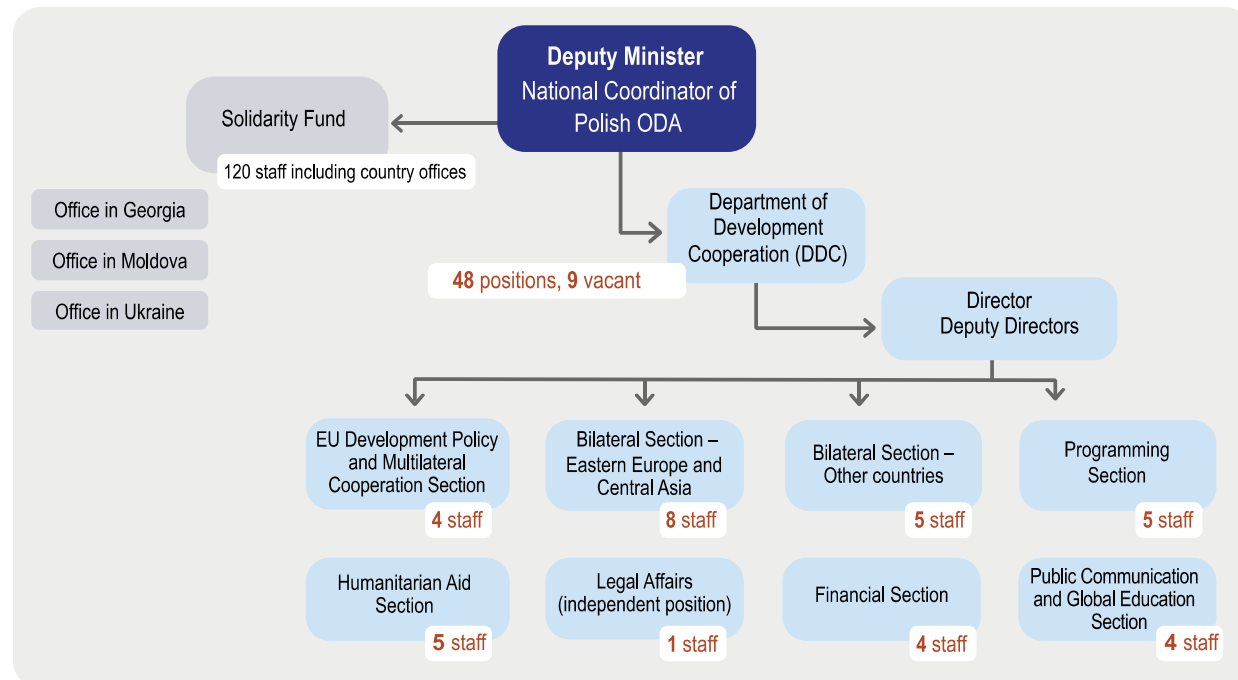
The MFA’s Department of Development Cooperation is responsible for steering Polish Aid, but its mandate and capacity to do so need reaffirming and strengthening

The 2011 Development Cooperation Act assigns the MFA responsibility for steering Polish development assistance. According to the act, the MFA is responsible for defining Polish development co-operation policy and strategy, and co-ordinating, planning and implementing the multiannual programme and annual financial plans under the brand Polish Aid. A dedicated department – the Department of Development Cooperation (DDC) – leads this work under the direction of the National Co-ordinator, the Undersecretary of State for Development Co-operation and Africa and Middle East Policy.⁴ This is done in collaboration with other departments in the MFA, including the EU and European Policy Department. As the “authorising officer” of ODA transfers from the special reserve budget held by the Ministry of Finance, DDC’s mandate includes approving and evaluating projects and ensuring they focus on priorities and follow aid effectiveness principles.⁵ In practice, however, other ministries can lobby

the Ministry of Finance for ODA resources, and the Ministry of Finance, in turn, has the authority to release the funds. In 2021, a larger share of the special reserve budget was integrated into the regular MFA budget to provide the MFA greater flexibility to allocate ODA, including in response to shifting priorities. The extent to which this enables the MFA to better steer ODA resources in line with agreed upon development co-operation priorities remains to be seen.

DDC’s organisational structure was partially reformed in 2020; however, fundamental challenges in the business model remain. In 2020, DDC established a separate programming section, with five staff (Figure 2). The section is responsible for preparing annual plans and the multiannual programme, managing the MFA’s calls for proposals including monitoring, and serving as secretariat to the Policy Council. While recent IT system investments have created some efficiencies in project management, the amount of staff time dedicated to managing calls for proposals remains extremely high. Ultimately, these reforms have not enabled DDC to focus on strategic planning. As recommended in Poland’s 2017 peer review, reducing the number of annual call for proposal instruments is acutely needed (Figure 5).⁶ This would free up much-needed staff time to focus on policy, steering and learning in line with DDC and the MFA’s mandate while enabling Poland to invest in fewer, bigger projects (see Poland’s bilateral programme: Priorities and programming). A more thematic approach to managing Poland’s development co-operation, including across the MFA, would also support greater synergies, learning and efficiency. DDC’s bilateral sections should work more closely with the relevant country desks of the MFA, for example, sharing contextual analysis, while focusing less on grant management. This would further free up DDC staff time to steer the development programme while supporting greater coherence and co-ordination across the MFA’s work.

Figure 2. The Department of Development Cooperation’s business model could be more efficient and better enable it to steer Polish development co-operation



Note: ODA: official development assistance; EU: European Union.

Greater appreciation of development co-operation across the MFA would enable DDC to steer more effectively. Development assistance generally remains a “niche” policy area, with limited awareness and

understanding across the government. DDC in turn struggles to put development co-operation priorities on other actors' agendas, including within the MFA.⁷ This is reinforced by the fact that DDC's office is physically separate from other relevant departments of the MFA, making natural co-ordination and integration more difficult. As seen in Moldova, the absence of a broader understanding of development assistance in the MFA and a strategic vision for how development co-operation allocations link to Poland's other foreign policy objectives limits the scope for a joined-up effort including at the country level.

Building awareness and understanding of development co-operation across the government would also support more effective co-ordination and collaboration. Much of Poland's bilateral ODA budget is delivered via the public sector (83% in 2020-21) and line ministries play an important role in this through co-operation with their counterparts in partner countries. In Moldova, Poland's Ministry of Interior and Administration and Ministry of Culture, Heritage and Sport are engaging with Moldovan counterparts. There is also co-operation with Moldova's Ministry of Energy. While different actors reference the current multiannual programme as the relevant framework, this is not yet translating into coherent programming. In practice, ODA is implemented in silos of small projects and disconnected from Poland's often significant high-level political dialogue in its partner countries. This results in – at a minimum – missed opportunities for different projects to be coherent with broader policy and mutually supportive. It also risks creating incoherence and can hamper whole-of-government position formulation (see Multilateral and civil society partnerships).

Clarifying key institutional functions will require political leadership and buy-in. The decision in 2020 to fully reincorporate the management of Poland's humanitarian assistance into DDC helped clarify roles and responsibilities and better draws on the extensive expertise and knowledge that exists within DDC's humanitarian aid section.⁸ Yet, the ongoing tendency to separate the delivery apparatus from political co-ordination makes it difficult to develop strategic planning and undermines the MFA's role as the lead institution. In addition to the Prime Minister's Plenipotentiary for Supporting Reforms in the Republic of Moldova, in May 2023, the President appointed a new Secretary of State, Government Plenipotentiary for Polish-Ukrainian Development Cooperation at the Ministry of Development Funds and Regional Policy.⁹ Both functions are separate from the MFA, and it is unclear how they relate to DDC's mandate to steer Poland's total ODA effort (Figure 1). This creates confusion and adds to inefficiencies. Clarifying co-ordination and reporting lines across different actors – including by reaffirming the MFA's mandate to steer – would enable Poland to define and implement its strategies and policy priorities more effectively. This would also enable Poland to better use the knowledge and experience that exists within DDC in a context of otherwise stretched resources.

Poland has an opportunity to reinvigorate and realign its evolving system to better deliver on its policy objectives

The increased visibility of Polish Aid prompted by the response to Russia's war of aggression in Ukraine is a chance to better embed development considerations in government policy objectives. Poland's impressive whole-of-society response to Russia's war in Ukraine raised the public profile of Poland's humanitarian aid (Box 1). This was matched by greater political attention on the challenges facing several of Poland's priority partner countries.¹⁰ This is a chance for the MFA to build an understanding of development co-operation, including beyond humanitarian assistance, across government. Doing so effectively will require political leadership and a high-level articulation of how development co-operation contributes to Poland's foreign policy goals. The 2024 review of the multiannual programme and the Foreign Minister's annual exposé to parliament are important occasions for the MFA to convene discussions across government and better draw the link between different policy objectives. Poland's upcoming Presidency of the Council of the European Union in 2025 is another critical moment for the MFA to raise its profile and illustrate the relevance of development assistance to Poland's foreign policy goals (see Multilateral and civil society partnerships). Drawing links more effectively across policy areas will also better position Poland to take on a greater convening role at the international level. Identifying political

champions to place development co-operation on the agenda of the Parliamentary Foreign Affairs Committee may be one way to achieve greater visibility and understanding of DDC's work.

Accelerated by recent crises, new and evolving actors present opportunities for innovation and reinvigorating Polish Aid. Poland's national development bank, BGK, is increasingly seeking to internationalise its activities supported by a small but growing International Development Team of 15 staff (BGK, 2021^[9]).¹¹ This includes greater engagement with the European Union, including with EU guarantee instruments, following BGK's pillar assessment in 2020.¹² The clear division of labour on private sector engagement between the MFA and BGK makes good sense. Going forward, bringing BGK into existing co-ordination structures, such as the Policy Council, will be useful, including to ensure it adopts a stronger development lens across its work. Encouraging BGK's engagement with European Development Finance Institutions (EDFI) – the association of European bilateral DFIs – would support this, building also on its existing engagement with the Joint European Financiers for International Cooperation (JEFIC).¹³ The Solidarity Fund has also been flexible and adaptive in responding to recent crises and has grown substantially in the past two years, in both budget and personnel, primarily through increased funding from external partners and different parts of the Polish government. Retaining this flexibility while equipping the MFA with the ability and mandate to steer an evolving development co-operation system is now an important challenge for Poland. To do so, DDC needs to be empowered with the necessary capabilities to build effective working relationships, supported by clear roles and responsibilities and backed up by political leadership.

The Development Cooperation Policy Council has potential to facilitate better policy formulation, co-ordination and strategic oversight but is underused. The Policy Council, established in 2011, is expected to meet at least twice a year and to serve an “opinion-making and advisory” function (Minister Spraw Zagranicznych, 2011^[10]). In practice however, the Council largely focuses on approving the annual financial plans for Polish Aid projects and is underused in terms of both co-ordination and advice (Government of Poland, 2023^[11]).¹⁴ Given the absence of debate on development co-operation in the parliament (Sejm, 2023^[12]), there is scope for the council to play a greater role as a much-needed advisory and consultation mechanism and in driving demand for results and oversight. Consistently publishing detailed summaries of all Policy Council discussions would support more effective debate through enhanced transparency. Providing documentation to members of the Council in advance and allocating time to genuinely discuss results and policy would also strengthen the Policy Council's role in providing solid recommendations to the government. Modifying the Council's membership to include all key actors, including relevant officials from the Solidarity Fund and BGK, would enhance co-ordination and information exchange and support more robust discussions on the challenges and opportunities for Polish Aid. Ensuring that CSOs selected for the council are representative is also important for the council's legitimacy and considering the critical role that civil society plays in effective policy making (OECD, 2022^[13]).¹⁵

As the Solidarity Fund evolves, clear roles and responsibilities will enable Poland to make the most of its unique strengths

The Solidarity Fund's model and thematic focus on democracy is unique and highly valued by partners at the country level. The Solidarity Fund, a foundation of the State Treasury,¹⁶ is headquartered in Warsaw and implements programmes via three representative offices in Chisinau, Kyiv and Tbilisi. Most staff in country offices are local, reflecting the strong focus on locally led development (Box 4). Country directors appointed from Warsaw support local staff. The Solidarity Fund's thematic focus on democratic transformation, good governance, civil society and human rights is also unique and highly valuable, as these core DAC values are increasingly challenged worldwide (V-Dem Institute, 2022^[14]).

Making the most of the Solidarity Fund's flexibility and entrepreneurial approach will require more fit-for-purpose governance arrangements. Oversight of the Solidarity Fund formally sits with a Supervisory Board comprising up to nine members of parliament and development co-operation experts

appointed by the Minister of Foreign Affairs, chaired by the National Co-ordinator for Polish Aid. The Solidarity Fund operates on an annual budget allocated, until recently, largely by the MFA and therefore overseen by DDC. This allocation (approximately EUR 7.6 million in 2022) is negotiated annually with DDC and includes a range of reporting requirements in line with MFA regulations. All funding is project-based; the MFA does not provide core funding. Political shifts in Belarus, COVID-19 and Russia's war in Ukraine have led to an increase in the number of Polish government actors seeking to work with the Solidarity Fund in recent years, including the Chancellery of the Prime Minister, the Ministry of Internal Affairs, the Ministry of Finance and the Ministry of Culture and National Heritage. The Solidarity Fund is also increasingly receiving significant funding from other actors, including the European Union, the United Kingdom and the United States Agency for International Development (USAID). As a result, the share of external resources has grown substantially, accounting for around 70% of the budget in 2022 compared to just 5% in 2019. The share of non-Polish funding is also likely to grow further following the Fund's successful EU Pillar Assessment in early 2023 (see Multilateral and civil society partnerships). These changes have increased the need for Poland to look at the Solidarity Fund's governance arrangements and its role in the broader Polish Aid system, and to ensure these are fit for purpose.

Investing in robust systems and improved project management capabilities would better position the Solidarity Fund to take on its evolving role. Given the Solidarity Fund's recent EU Pillar Assessment, there is good potential for it to continue serving as a key implementing actor within the Polish Aid system, as well as a repository of knowledge and expertise on democratisation and human rights. To deliver on this, the Solidarity Fund recognises the need to continue professionalising its systems and building expertise, strengthening knowledge management, and improving project management capabilities. This should focus, in particular, on strengthening systems to manage for risk and mainstream gender equality and climate and environment. As the Solidarity Fund has taken on a greater direct implementing role – for different parts of the Polish government and for other partners – Poland should be careful not to dilute the Solidarity Fund's added value and thematic expertise in the areas of governance and democracy when this is critically needed, including in the context of the reconstruction of Ukraine.¹⁷

The relationship between the MFA and the Solidarity Fund should reflect the MFA's role in formulating policy and steering. The lack of strategic programming of Polish Aid activities is hampering the extent to which DDC can effectively steer the system, including the Solidarity Fund. This is in turn contributing to strained communication between the MFA and Solidarity Fund, limiting information sharing and hampering organisational effectiveness. As noted above, freeing up DDC staff time to focus on defining and agreeing overall goals for Polish Aid based on partner country priorities would better enable it to steer different parts of the system more effectively. Building trust between DDC and key stakeholders, including through regular consultations and exchanges of information as well as clearly defined rules and procedures, backed up by necessary senior-level leadership, will be important. As a first concrete step, agreeing on multiannual core funding for the Solidarity Fund would help reduce transaction costs. Going forward, moving from an annual plan towards a multi-year strategic framework that clearly articulates the objectives Poland is seeking to achieve through its ODA and how the Solidarity Fund contributes to this would support greater effectiveness.

Human resources are a significant bottleneck and need investing in as a priority

Human resources are a recognised challenge across the Polish civil service. The high turnover in the MFA and across the civil service as a whole – linked in part to uncompetitive salary packages, high workload and difficult operating environments – is contributing to staff churn. While the National School of Public Administration is helping to professionalise the Polish civil service, there is a need for greater stability and continuity to reduce staff turnover and help retain civil servants with institutional memory and knowledge (OECD, 2021_[15]). Merit-based, competitive recruitment for senior civil service positions could improve the attractiveness of the government as an employer (OECD, 2021_[15]).

Human resource constraints are particularly acute in DDC, affecting its ability to deliver on much-needed reforms. DDC benefits from a small team of dedicated staff who have developed a good understanding of international development co-operation standards. It has used secondments strategically to build technical knowledge, for example, on ODA statistical reporting.¹⁸ While diplomatic staff in the MFA rotate regularly (usually every four years), non-diplomatic staff do not and are able to build expertise in a specific area. Nevertheless, there are few incentives encouraging MFA staff to choose a development rotation or track and, overall, staff numbers in DDC have declined since the last peer review, with 48 positions in total, 9 of which have been vacant for extended periods of time (see Figure 2) (MFA, 2023_[1]).¹⁹ These long-standing staffing gaps and resulting heavy workloads constrain strategic thinking, undermine efforts to follow through on reforms, and impact teamwork and knowledge transfer (MFA, 2023_[1]). COVID-19 and Russia's war in Ukraine have also placed significant pressure on MFA staff, further contributing to the risk of burnout. The MFA could learn from other DAC members' experiences with duty of care, for example, by providing psychological support and services to MFA staff exposed to the pressures of war and its consequences in Poland.²⁰ The growing number of international organisations based in the region will also likely make the already difficult context of attracting and retaining qualified personnel more challenging. This brings real risks for Poland's already highly stretched system. The MFA needs to focus on how it can become more attractive to retain skilled and appropriately qualified staff.

Investing in training will enable existing staff to carry out their functions more effectively. While the Diplomatic Academy has integrated some relevant courses into the mandatory training for new MFA staff, staff are not necessarily able to allocate time and are struggling to develop the knowledge needed for their evolving functions. The lack of training seems to have worsened since COVID-19, including for staff in embassies, despite the growing relevance of development co-operation in several partner countries and the often increasingly complex environments in which staff operate. Making basic training on development co-operation mandatory for all MFA staff at a minimum, including those with part-time development functions in embassies, would help professionalise Poland's development co-operation. This should go beyond initial pre-posting training and involve regular upskilling as staff functions evolve. Expanding development-related training beyond the MFA could also help build networks and capabilities across government, considering the range of ministries outside the MFA involved in Polish development co-operation. Linking this to existing administration-wide training on the SDGs could help build awareness and understanding of development beyond DDC (MFA, 2023_[1]). Drawing on resources that exist elsewhere – for example, in the European Union or training offered by other bilateral partners such as on thematic issues, results and risk management²¹ – would reduce the need for Poland to develop resources in-house.

Strengthening development capabilities in embassies, particularly in priority partner countries, would support more effective partnerships. Seven of Poland's embassies currently have staff responsible for development co-operation; however, this often constitutes one of several responsibilities. In Moldova, the responsible first secretary also covers trade, economic co-operation and culture, limiting the amount of time dedicated to development co-operation. The review team were unable to meet with other staff in the embassy, which includes a military attaché and staff attached from other government agencies and staff appear to have limited capacity to co-ordinate across different areas. Ensuring staff responsible for development co-operation have the knowledge and are empowered to co-ordinate, convene and collaborate would improve efficiency and impact. For embassy staff in Poland's priority countries, requiring rotations in DDC before and, where possible, following a posting could better prepare staff managing development programmes while ensuring learning continues to feed back into the system.

Mobilising local staff, supported by clear career development opportunities, may help address some gaps. Local staff can be an invaluable asset to embassies, given their ability to build institutional memory; foster relationships and networks; and contribute to a better understanding of cultural context, country priorities and needs. Poland's embassy in Moldova is currently the only embassy with a locally engaged staff member working on development co-operation. Nevertheless, staff time remains occupied with administrative work, with limited opportunities for career progression. As Poland looks to make the

most of local staff expertise and experience in Moldova and its other embassies, it will be important to develop transparent job descriptions with clearly defined development duties and enable staff to reserve time beyond administrative functions to deliver on these duties. Enabling future local staff to regularly identify training needs and ensuring time and resources are available to fulfil this will also be key.²² Recruiting more local staff in embassies with development co-operation programmes, supported by training and clear roles and responsibilities, could help Poland to address the current gaps in embassy resourcing and support more effective partnerships and delivery.

A strategic workforce plan for the MFA that identifies how Poland will buy in additional skills is needed to build an appropriate cadre of qualified staff. Looking ahead, the MFA and DDC need to identify what skills they need and where, define a medium-term plan, and allocate resources to meet these needs. This should include how the MFA as a whole will continue to develop the skills of existing staff to build, deepen and retain core development expertise and protect functions that require stability (for example, on results-based management, evaluation and learning). Increasing opportunities for knowledge and skills exchange between the MFA and other parts of the system, including line ministries, the Solidarity Fund and BGK, may be useful to build and strengthen collaboration and understanding. Continuing to exploit secondment opportunities across the government and with other institutions will also be useful to improve skills, incentivise good staff to remain in the system, and build relationships and networks.²³ Greater transparency and consistency around contract conditions and career advancement within the MFA could also help encourage knowledgeable staff to stay. Given the long-standing challenges to date in retaining expertise, Poland should also explore how to buy in critical additional expertise, such as via research institutes and academia or technical help-desk functions on thematic issues, an approach used by other DAC members.²⁴

A more co-ordinated approach would also increase consistency between policy goals and promote policy coherence for development

Poland's policy documents commit to policy coherence for development and identify a set of priority areas. The MFA is mandated to co-ordinate government activities to consider the possible spillover or transboundary effects of policies and regulations on other countries, including developing countries, while the Ministry of Economic Development and Technology is responsible for national implementation of the SDGs (Government of Poland, 2021^[4]). Poland has identified five priority policy coherence for development issues, which is good practice: 1) illicit financial flows in the areas fighting tax evasion and money laundering; 2) combatting illegal trade in endangered plant and animal species; 3) corporate social responsibility standards; 4) sustainable cities and communities; and 5) climate, including the natural environment and the seas.²⁵ Activities in these priority areas should be led by the relevant line ministry, in co-operation with the MFA and in consultation with other ministries. Priority issues are set out in Polish Aid's multiannual programme and updated from time to time in annual plans. The government is expected to present progress on each priority area to the Policy Council on an annual basis (Government of Poland, 2021^[4]) although in practice, this does not yet systematically take place.²⁶ When line ministries do report to the Policy Council, the reports and subsequent discussion are not made public, making it difficult to track progress and missing the opportunity for more informed public debate.

Poland could take action to adjust its policies in areas that have significant transboundary implications. There has been some positive progress. For example, Poland's Energy Policy to 2040 adopted in 2021 provides policy direction for the energy sector to transition away from its current heavy reliance on coal (OECD, 2023^[3]). Poland's ranking on the Commitment to Development Index also improved slightly between 2020 and 2023.²⁷ However, Poland could do more to implement the OECD Anti-Bribery Convention, with the 2022 review of Poland's compliance pointing to significant concerns that key recommendations fundamental to fighting foreign bribery have not been implemented (OECD, 2022^[16]). The need for a strengthened approach to foreign bribery is even more pressing in the context of Ukraine's reconstruction, given the strong likelihood that Polish companies will participate in the future

recovery efforts (OECD, 2022^[16]). Greater attention is also needed to balance national and global development objectives in relation to, for example, Poland's agricultural sector. Poland's policy stances have also impeded international and EU agreements of strategic interest for sustainable development and developing countries. This was evident for example in the delays to the approval of the EU's co-operation framework aimed at modernising and strengthening the partnership between the EU and African, Caribbean and Pacific states (the "Post-Cotonou Agreement").²⁸ Poland's migration and border policies could likewise be more coherent with its international commitments to international human rights and refugee law (Human Rights Council, 2023^[17]; Council of Europe, 2022^[18]). This is a further area where open public discussion and informed debate could help address challenges.

Analysing and addressing areas of incoherence would benefit from greater development awareness across government and society. At present, regulatory impact assessments are required for all laws and regulations. This enables the Ministry of Economic Development and Technology to monitor the implementation of the SDGs and analyse the impact of regulations beyond individual ministerial silos. As raised in Poland's 2017 peer review, these regulatory impact assessments could be expanded to consider key sustainable development elements, including transboundary impacts of Polish laws and regulations on other countries' development aspirations. Institutional responsibilities for following up on policy coherence priorities could also be clarified. Strengthening collaboration between relevant teams in the MFA and the Ministry of Economic Development and Technology would be an important first step, and would require strong political signals to help foster collaboration. Enforcing the requirement to report to the Policy Council annually on all policy coherence priority areas and making these reports public would help to build accountability and provide an opportunity for more informed debate, including through a parliamentary discussion. Polish CSOs and research institutes also have strong analytical capacity and potential to advocate on policy coherence for development issues, which the government could harness to stimulate debate and action (see Multilateral and civil society partnerships).

Recommendations

- To increase public support for and political commitment to Polish Aid, Poland should invest in development education and foster debate in Parliament and society on how development co-operation contributes to Poland's policy goals.
- To strengthen policy formulation, co-ordination and strategic oversight, Poland should make use of the Development Co-operation Policy Council to drive substantive discussions, including through more inclusive membership and transparent processes.
- To maximise the contributions of all actors in the Polish development co-operation system, supported by more effective working level co-operation and communication:
 - Poland should reaffirm the MFA's capacity and mandate to set policy and steer all Polish development co-operation, and better recognise the contribution of development co-operation to Polish foreign policy including through greater analysis and knowledge sharing across the MFA;
 - all ministries should align their ODA activities to the commitments and priorities articulated in the multiannual programme and respond to the MFA's direction;
 - the Solidarity Fund should strengthen its capabilities and systems for implementing development co-operation effectively to deliver a professional, flexible and country-led approach; and
 - BGK should work with the MFA to bring a development lens to its growing engagement in partner countries.
- To build an effective workforce, the MFA should prioritise merit-based hiring and allocate resources to strengthen development capability, including among senior officials and embassy staff.

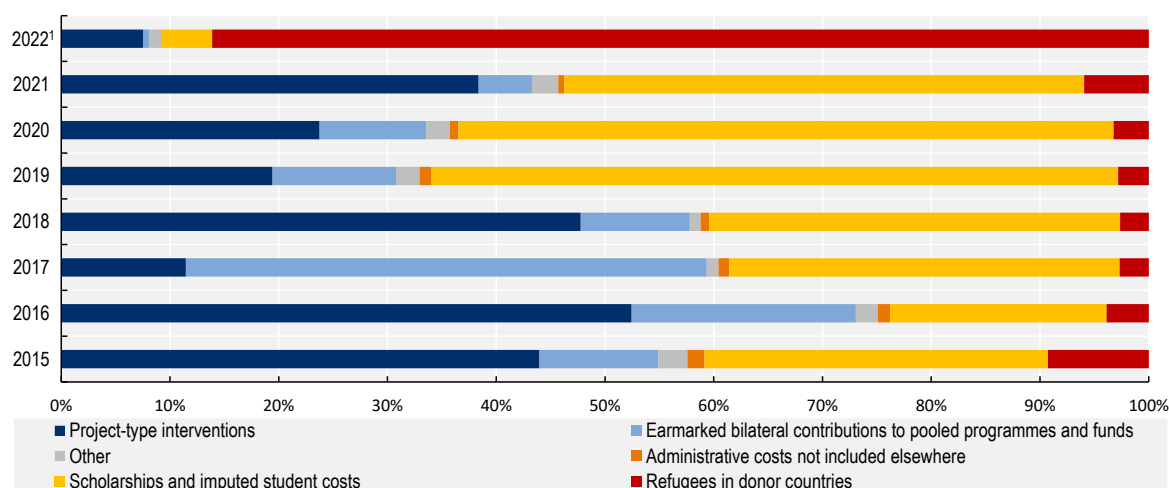
Poland's bilateral programme: Priorities and programming

ODA volume has not reflected Poland's strong economic trajectory and continues to comprise a large share of in-donor costs at the expense of country programmable aid

Poland's response to Russia's war of aggression in Ukraine is an opportunity for Poland to create momentum to increase ODA in line with its international commitments. Poland has committed to increase ODA to 0.33% of gross national income (GNI) by 2030 (Government of Poland, 2021^[4]). Since the last peer review, total ODA increased from 0.13% of GNI (USD 702 million) in 2017 to 0.15% of GNI (USD 984 million) in 2021, exceptionally increasing to USD 3.4 billion (0.51% of GNI) in 2022 (preliminary figures, constant prices).²⁹ In responding to urgent needs, Poland was able to mobilise significant additional funding including from the Prime Minister's Special Reserve, to address the humanitarian needs caused by Russia's invasion of Ukraine (OECD, 2023^[3]). There may now be an opportunity to harness this political momentum in favour of increased investments in Polish Aid to meet the minimum standards of DAC membership (0.20% ODA/GNI) and in line with Poland's commitment to reach 0.33% ODA/GNI by 2030. Doing so will require a stronger political commitment to development co-operation (MFA, 2023^[1]) and a clear road map that sets out how Poland will achieve this over the next seven years in view also of broader fiscal pressures. For example, Poland could look at how Estonia developed a multi-year plan with annual targets to reach 0.33% of GNI for ODA by 2030 (OECD, 2023^[19]).

Investing in and protecting country programmable aid from future fluctuations would improve the quality of Poland's bilateral ODA. The 2017 peer review recommended increasing bilateral ODA; however, Poland's gross bilateral ODA grew only marginally from USD 277.5 million in 2017 to USD 307.9 million in 2021 (constant prices). When excluding exceptionally high in-donor refugee costs, bilateral ODA was USD 406.4 million in 2022 (preliminary figures). Imputed student costs and scholarships continue to account for a large share of bilateral ODA (47.8% in 2021) and country programmable aid continues to fluctuate significantly from year to year (Figure 3). Overall, country programmable aid has not grown substantially since the last review, reaching only USD 130.2 million in 2021, compared to USD 123.8 million in 2017. Together with the relatively small budget envelopes for Poland's priority partner countries, this undermines more strategic and stable programming in partner countries.

Figure 3. The composition of Poland's bilateral ODA is heavily skewed towards in-donor costs



Notes: Earmarked bilateral contributions to pooled programmes and funds went mainly to the EU Facility for Refugees in Türkiye (2016-2021), the EU Regional Trust Fund in Response to the Syrian Crisis (2016 and 2017) and the European Investment Bank's Economic Resilience Initiative (2017). The category "Other" represents budget support, debt relief, development awareness, and experts and technical assistance.

1. 2022 data are preliminary and therefore types of bilateral ODA are not fully disaggregated. Poland estimates that scholarships and imputed student costs accounted for 4.9% of bilateral ODA in 2022. All amounts are based on net bilateral ODA (2021 constant prices).

Source: OECD (2023^[20]), *Total flows by donor [DAC1]*, <https://stats.oecd.org/Index.aspx?DataSetCode=TABLE1>.

StatLink  <https://stat.link/8vaxxi>

De-linking programmable bilateral ODA and in-donor costs would support planning. As of 2022, the MFA has worked with the OECD Secretariat to clarify the eligibility of costs associated with supporting Ukrainian refugees in Poland. Poland shared its methodology with the OECD and is one of five DAC members to provide a breakdown by type of expenditure, which is good practice.³⁰ Ensuring that costs incurred after individuals have spent more than 12 months in the country are not reported as ODA remains a challenge. Poland's approach to including security costs in ODA reporting remains unclear and should also be clarified (OECD, 2022^[21]). Publishing its model for counting refugee costs on the DAC website would improve transparency. Removing all non-eligible costs (such as security costs) from ODA reporting would also improve the quality of Poland's ODA statistics. To limit the risk of fluctuating in-donor costs for the core bilateral ODA programme, Poland should keep bilateral ODA and in-donor refugee costs separate from a budgeting perspective. Applying a cap on the volume or share of in-donor refugee costs that can be counted as ODA is an effective approach adopted by some DAC members, such as the Netherlands and Sweden (OECD, 2023^[22]; 2023^[23]). Some DAC members have also chosen not to report in-donor refugee costs as ODA such as Luxembourg and, in the case of Ukrainian refugees, Belgium.

Progress on untying ODA is needed to improve effectiveness and deliver on Poland's commitments. The share of Polish ODA that is untied stood at just 7.5% in 2021 based on the coverage of the DAC Recommendation, the third-lowest among DAC members, and 18.7% for all bilateral ODA (excluding administrative and in-donor refugee costs) (OECD, 2023^[24]). This was also a decline in Poland's performance against the Recommendation compared to 2020 and 2019 (OECD, 2022^[25]).³¹ Poland continues to see tied loans as an avenue for promoting its private sector abroad. Following the 2017 peer review, the Ministry of Finance adopted a policy in 2019 requiring all tied aid loans to be consistent with Poland's priority countries and themes (MFA, 2023^[1]).³² While this potentially helps bring Poland's tied loans in line with its bilateral priorities, it does not address its performance against the Recommendation. Poland is also currently negotiating a new tied aid loan to Viet Nam, which is not a priority partner country and annexes to existing agreements are being negotiated with Kenya, Mongolia and the United Republic

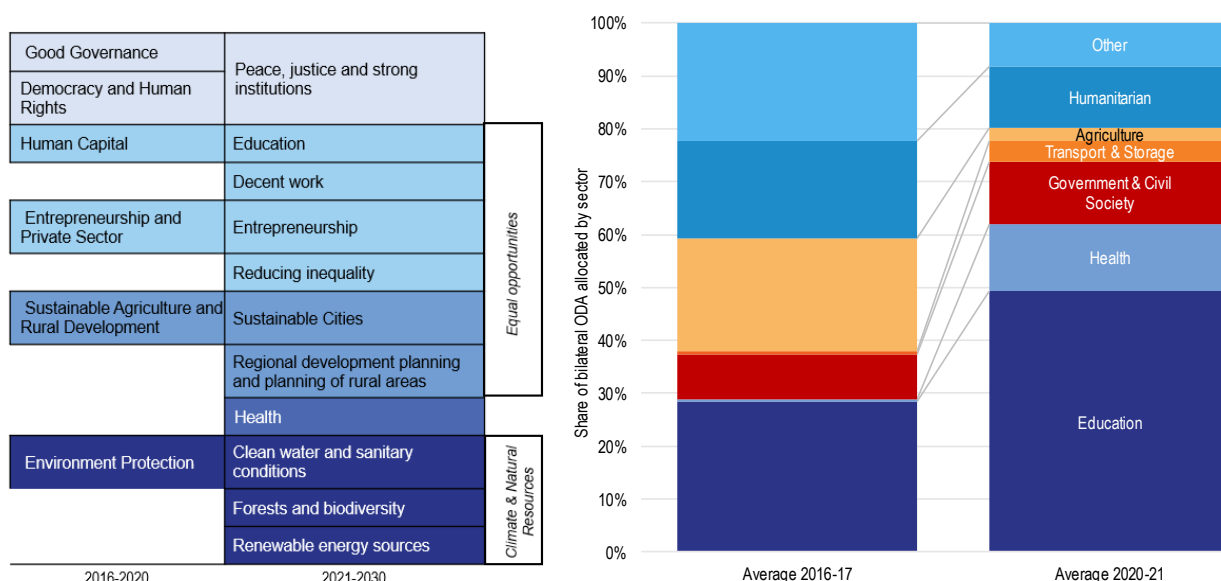
of Tanzania. Advancing the renegotiation of an existing tied aid credit agreement with Moldova will require Poland to forego the tying condition to comply with the Arrangement on Officially Supported Export Credits (OECD, 2022^[26]). Where Poland chooses to tie its loans to Polish enterprises, it should focus on ensuring value for money, ownership by the partner country and that the loan contributes to integrating the partner country into the global economy. To do so, Poland will need to ensure that Polish suppliers are selected through competitive bidding procedures and that loans follow the minimum concessionality rules of the Arrangement (see Annex B).

Increasing the geographic and thematic focus of Poland's small bilateral ODA budget would enhance quality and impact

A focus on Poland's neighbourhood draws on its comparative advantage and supports long-term engagement; reflecting this in ODA allocations would better deliver on its priorities. The 2021-30 multiannual programme retains a limit of ten priority partner countries,³³ in theory helping to keep a check on the geographic focus of Poland's small programmable bilateral budget. According to the multiannual programme, Poland's list of priority countries will next be reviewed in 2024 and 2027. When reviewing the list, Poland should focus on predictability for partner country stakeholders and ensuring it can plan longer term allocations in line with its comparative advantage. Poland could also do more to focus its small bilateral ODA budget on its priority partner countries. In 2020-21, only three priority countries were among the top 10 recipients of bilateral ODA. Except for Belarus and Ukraine, the average annual bilateral portfolio in Poland's priority countries is also small: approximately USD 3 million for Georgia and USD 2 million for Moldova (OECD, 2023^[7]), in each case accounting for only 2% to 3% of gross bilateral ODA.³⁴ Better matching bilateral ODA allocations with Poland's priorities would support more substantial investments in priority countries.

A growing list of thematic priorities risks further fragmenting already stretched bilateral ODA resources. Drawing on its own transition experience, Poland's bilateral programme has traditionally supported good governance and democracy, focusing in recent years on media and the free flow of information. This focus on democratic transition continues to be seen by partners as core to Poland's value add and is also evident in Poland's engagement in EU Twinning and TAIEX activities, which Poland seeks to sequence with its own bilateral efforts for greater impact (Box 1). However, compared to the 2016-20 multiannual programme, the 2021-30 multiannual programme includes more broadly defined thematic priorities, adding health, sustainable cities and regional development, and expands the issues covered under climate and the environment to include renewable energy (Figure 4). In total, the current multiannual plan lists 11 thematic priorities, compared to 6 in the previous programme.³⁵ This increase in thematic areas is also reflected in the broader range of activities undertaken by the Solidarity Fund (Fit-for-purpose institutional arrangements). Spreading Poland's limited bilateral ODA even more thinly risks limiting the impact of scarce ODA resources while making it more challenging for Poland to identify and convey to its partners where it can add value.

Figure 4. Polish Aid is targeting a broader range of sectors and themes



Note: The higher share for health in 2020-21 mainly reflects COVID-19 support, primarily vaccine donations.
 Source: 2016-20 multiannual programme MFA (2018^[27]); OECD (2023^[7]), OECD Creditor Reporting System, <https://stats.oecd.org/Index.aspx?DataSetCode=crs1>.

StatLink <https://stat.link/6qhyfd>

Box 1. Sequencing bilateral co-operation and EU Twinning investments for greater impact

Poland’s current multiannual programme, “Solidarity for Development”, aims to enhance the effectiveness of Polish Aid by participating in and leveraging European Union (EU) development co-operation programmes. Poland is a key actor across EU [Twinning and Technical Assistance and Information Exchange \(TAIEX\)](#) initiatives. Having been a beneficiary of TAIEX since 1996 and of 248 Twinning projects since 2008, Polish public sector experts have acquired a good understanding of EU legislation and offer a unique perspective on issues related to its transposition, implementation and enforcement. Through its participation, Poland is also able to contribute to its foreign policy goals.

The Ministry of Foreign Affairs (MFA) takes a deliberate approach to aligning Twinning and TAIEX projects with its geographic and thematic priorities. It leverages its bilateral projects to identify follow-up Twinning or TAIEX projects in collaboration with partner country authorities. Poland focuses on engaging in Twinning and TAIEX projects in its areas of expertise, including public financial management, banking and auditing. Once possible projects are identified, Poland encourages its partner countries to reach out to the European Union. Reflecting Poland’s strong engagement, Warsaw will host the first post-COVID annual meeting of national Twinning co-ordinators in 2023, with a focus on increasing Twinning activities to support Ukraine.

Poland values Twinning projects as an opportunity to strengthen political contacts with partner countries, which can also serve as a basis for potential future economic co-operation. Twinning also has a positive impact on the professional development and satisfaction of those involved in the projects and can provide opportunities for Poland to showcase its expertise to EU partners. Twinning can also serve to improve collaboration among EU Member States. A Twinning project on “Prevention and Combating Money Laundering and Terrorism Financing” in Moldova, for example, enhanced

collaboration and swifter exchange of information among relevant Lithuanian, German and Polish authorities.

Notes: TAIEX involves public experts in EU Member States offering peer-to-peer technical assistance and policy support to both EU and non-Member states across the world. TAIEX activities are short in duration (one to five days). Twinning is a policy-driven instrument for institutional co-operation between public administrations in EU Member states and partner countries. It is funded as a grant from the EU budget and jointly implemented by Member States and partner country administrations. Twinning activities are longer (up to three years).

Sources: European Commission (2021^[28]), *TAIEX and Twinning Annual Activity Report*, https://neighbourhood-enlargement.ec.europa.eu/funding-and-technical-assistance/taiex/taiex-twinning-annual-activity-report_en; MFA (2022^[29]), *2023 Development Cooperation Plan*, <https://www.gov.pl/web/polishaid/programming>; Government of Poland (2021^[41]), *The Multiannual Programme for Development Cooperation for 2021-2030: Solidarity for Development*, <https://www.gov.pl/web/polishaid/the-multiannual-programme-for-development-cooperation-for-2021-2030-solidarity-for-development>; Central Project Management Agency (2022^[30]), "Lithuania, Poland, Germany and Moldova announce the results of EU AML/CFT Twinning Project", <https://www.cpva.lt/en/news/366/lithuania-poland-germany-and-moldova-announce-the-results-of-eu-aml-cft-twinning-project:643>; MFA (2023^[31]), *Letter by the Undersecretary of State for Development Cooperation Announcing the List of EU Twinning Projects for 2023-24*, <https://twinning.msz.gov.pl/media/2321/pismo.pdf>.

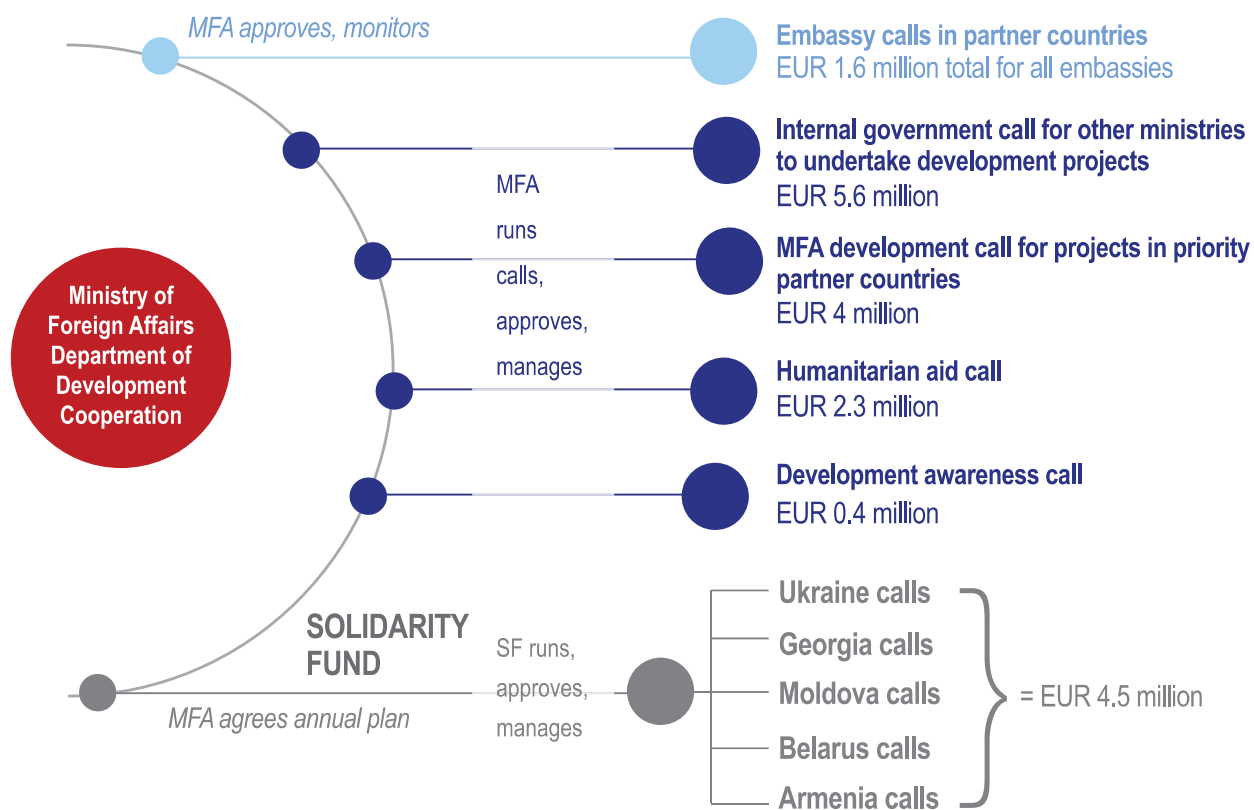
This practice is documented in more detail on the Development Co-operation TIPs – Tools Insights Practices platform at: <https://www.oecd.org/development-cooperation-learning/practices/mobilising-public-institutions-to-support-partner-country-reforms-through-eu-twinning-and-taieX-9561c44b/>.

Ongoing reliance on annual projects limits Poland's ability to plan strategically in line with partner country priorities

Poland continues to programme its bilateral ODA annually, undermining quality and efficiency.

Poland has an annual budgeting process, one year in advance, and ODA is committed and planned on an annual basis.³⁶ In programming bilateral ODA, the MFA relies on annual calls for proposals (Figure 5). Following each call, DDC selects a list of projects that are then approved by the State Secretary, who serves as National Co-ordinator of Polish ODA. The consistently late announcement of calls and slow decision making have led to the late disbursement of funds by the MFA in recent years.³⁷ This leaves partners with less than six – and sometimes only three – months to implement projects and report, undermining the scope of the results that can be achieved. Within the current annual budgeting constraints, ensuring that mechanisms and processes are in place to support predictability and transparency around decision making would improve the management of annual calls, strengthen partners' trust and improve the effectiveness of Poland's projects. DDC's efforts to move towards more "modular" multi-year projects should help increase predictability and potentially improve the sustainability of the intended results. However, the annual application and approval process of modular projects means that CSOs still often need to fill funding gaps.³⁸ Going forward, Poland should prioritise a more flexible, sustainable approach to programming its bilateral ODA based on multi-year planning and budgeting, with fewer, but bigger projects. Planned reforms to the government's annual budget process will be important to support this (European Commission, 2023^[32]).

Figure 5. The multitude of annual calls for proposals could be reduced and streamlined



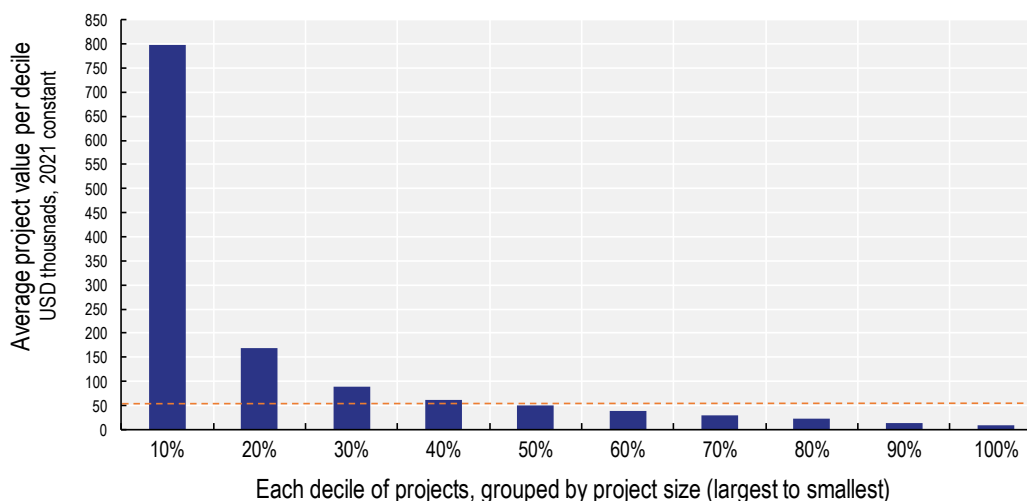
Notes: MFA: Ministry of Foreign Affairs. Amounts are based on 2023 planning documents. Until 2021, DDC also ran a call for proposals for Volunteers Poland. See: <https://www.gov.pl/web/polskapomoc/msz-nie-oglosi-w-2021-r-konkursu-wolontariat-polska-pomoc>. The MFA Departments of Public and Cultural Diplomacy and of Poles Abroad also organise calls for proposals. DDC staff sometimes sit on the selection committees but do not have an oversight role. These calls are not reported as ODA.

Source: Amounts are based on MFA (2022^[29]), 2023 Development Cooperation Plan, <https://www.gov.pl/web/polishaid/programming>.

Reliance on annual calls for proposals also limits Poland's ability to invest strategically and fulfil its commitments to country ownership. As pointed out in the last peer review, Poland's annual budget planning prevents the MFA from providing regular forward expenditure plans to partner countries, as agreed in the Busan Partnership for Effective Development Co-operation (OECD, 2017^[33]). In Moldova, while the country annual plan lists many of Poland's projects – 17 in total with a budget of EUR 130 000 in 2023 – it does not provide a comprehensive picture of Poland's engagement in the country for staff in embassies. Nor does it link different activities to a broader set of strategic objectives described in the multiannual programme. The range of very small projects managed under different instruments also risks duplication and incoherence (Figure 6). For example, in Moldova, the embassy and the Solidarity Fund both funded a similar urban development project in the same town, but with conflicting objectives.³⁹ Partners in Moldova highlighted that this fragmentation of projects, annual programming and limited embassy capacity hamper Poland's ability to co-ordinate with partner country government stakeholders. In addition, most of Poland's bilateral ODA is also not recorded on the Moldovan government's budget or the donor co-ordination platform. Clearer strategic goals coupled with greater embassy capacity to co-ordinate would improve consultation with partner country officials and better enable Poland to deliver on its commitment to country ownership. This would also enhance Poland's ability to partner and co-ordinate with other actors in its partner countries, strengthening efficiency and impact.

Figure 6. Poland's capacity to allocate ODA strategically is limited by the need to manage many small projects

Except for a few large projects, most of Poland's projects in 2021 were valued at less than USD 50 000



Notes: In 2021, there were 173 projects with a median value of USD 43 000. Deciles split up the 173 projects in 2021 into 10 equally large subsections of 17 projects each, represented in descending order of project value.

Source: OECD (2023_[7]), *OECD Creditor Reporting System*, <https://stats.oecd.org/Index.aspx?DataSetCode=crs1>.

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Defining a set of strategic objectives in line with partner country priorities and linking programming decisions to these would result in more sustainable investments

Clearer objectives in each priority partner country accompanied by a simple theory of change could better guide programming decisions. Poland's current multiannual programme commits to developing country strategies for priority partner countries. DDC's intention to start with a small number of pilot country strategies is logical. The future strategies or plans should be simple, focusing on being useful from a planning and programming perspective, and proportionate to the size of Poland's country programmes. Feedback from the government of Moldova emphasised the need for more co-ordinated conversations facilitated by the embassy on Poland's whole-of-government engagement in the country. Using government consultations as the starting point for formulating rolling country strategies or plans that capture all of Poland's engagement in a country – including that of the MFA, other line ministries and agencies, the Solidarity Fund, and BGK – will be important. Strategies should focus on a narrow and measurable set of objectives that are agreed upon and aligned with partner country priorities. Making the plans publicly available would increase transparency, accountability, collaboration and coherence, enabling all relevant actors to align with the agreed-upon priorities.

Accompanying planning instruments with a system to report on and learn from results would support decision making. In addition to framing consultations with partner countries, by including a results measurement plan or framework, country strategies could serve as a medium-term tool to help the MFA identify and strengthen the focus on results. Poland's self-assessment highlights the underuse of monitoring tools by staff and an organisational culture with little focus on results as key obstacles to building an effective results-based management approach (MFA, 2023_[11]). Recent monitoring reports confirm this, varying in quality and with very limited information on results. Where results information is included, it is at a very general level, making reporting and aggregation challenging and hampering opportunities for learning.⁴⁰ While in the past the MFA published an annual report on line, it has not done so since 2019,

hindering both transparency and accountability on the results Poland is achieving (Government of Poland, 2023_[34]).⁴¹

Publishing annual reports that capture the results of all Polish Aid would provide greater incentives for staff to monitor for, report on and be guided by results. Requiring discussion on these results, such as through the Policy Council, would also be useful and in line with Poland’s regulations and commitments. To avoid overburdening staff and processes, Poland should focus on simple, practical tools for results monitoring that target information that is useful. Prioritising improved knowledge management and organisational learning within DDC will be important. This will ensure that improvements in the quality of results information informs strategic planning and thinking.

Poland’s annual evaluation syntheses were useful and should be continued to increase learning and better inform decision making. In the past, Polish Aid conducted at least one strategic evaluation per year and in 2020 DDC developed specific guidelines to support more effective evaluation. Up to 2020, DDC published an annual synthesis of evaluation findings on the Polish Aid website alongside the more detailed reports. This was useful and a good practice. However, this practice has been discontinued since 2020, along with the independent evaluation function that undertook this work. This is partly due to stretched human resources in DDC and the reassignment of the individual staff member to another function in the Programming Section. Having an established system of performance monitoring and evaluation is a key criterion for DAC membership and critical for effective bilateral co-operation (OECD, 2016_[35]; 2023_[36]). Going forward, Poland will need to ensure it allocates sufficient resources to evaluation. Developing a plan with topics on which the MFA would benefit from learning would make efficient use of limited resources and help to ensure that learning informs future programme decisions. Annual syntheses of learning across key issues and themes could also consider lessons from other bilateral or multilateral providers. Conducting evaluations and learning jointly with other donors would also enhance the efficiency and relevance of these efforts.

A strengthened approach to implementing cross-cutting issues and managing for risk is needed to improve the quality of bilateral ODA

Poland has identified two cross-cutting priorities, which it is gradually integrating into policy documents. The 2021-2030 multiannual programme defines “climate” and “equal opportunities for men and women” as horizontal priorities and stipulates that all projects should be preceded by an analysis of their compliance with these priorities. The 2022 Development Cooperation Plan was the first annual plan to include guiding language on the two cross-cutting priorities, helping to raise some awareness among staff (MFA, 2021_[37]). Guidelines associated with the 2023 development call for proposals also include some information for partners on how Poland expects climate and the environment to be considered in project design. However, these documents fall short of practical tools or guidance for staff and partners to effectively mainstream climate and gender equality across the project cycle. The lack of a harmonised definition across documents potentially creates further confusion around their implementation (MFA, 2023_[38]).⁴² Based on Poland’s statistical reporting, there is significant room for improvement on both issues. In 2020-21, for instance, Poland committed just 4.4% of its total bilateral allocable ODA in support of the environment and the Rio Conventions, compared to the DAC average of 34.3%. Just 3.2% of Poland screened bilateral allocable ODA went to gender equality and women’s empowerment, compared with the 2020-21 DAC average of 44.4%, over the same period.

Building systems and expertise to integrate cross-cutting priorities more systematically into projects could usefully draw on existing knowledge and mechanisms. Recent project monitoring reports make very little reference to the requirement to mainstream environment and gender equality into projects. Where they do, information is inconsistent and clearly points to the need for a more systematic approach. To address this, DDC plans to develop and integrate guidelines for mainstreaming cross-cutting priorities in existing grant management guidance, including a checklist to accompany every project

proposal (MFA, 2023_[11]). It will be important that future guidelines apply not only during the design phase but across the project cycle. Efforts by the MFA to draw on expertise from other ministries, for example the Ministry of Climate and Environment, are commendable, but are not yet bearing fruit, undermined in part by challenging inter-ministerial co-ordination. While the Solidarity Fund has started to explore how to better integrate environmental considerations across its activities, driven in part by partnerships with the European Union and USAID, there remains room to improve. A range of lessons from other DAC members can also inform Poland's approach (OECD, 2019_[39]; 2022_[40]), including in recent guidance for DAC members on gender equality and the empowerment of women and girls (OECD, 2022_[40]). A good starting point may be the DAC policy markers, which are not only a measurement tool but are also used by Members as a trigger to reflect on how they mainstream priority issues, in that they can prompt thinking about what score to allocate - and why - in the design and planning phase of projects. Going forward, it will be important to invest in relevant thematic expertise within the MFA while drawing on existent expertise from Poland's development ecosystem and building greater understanding at senior levels.

Better integrating gender equality and women's empowerment would be in line with partner countries' priorities. Leadership commitment and a sound policy framework that recognises the importance of gender equality and the empowerment of women and girls are cornerstones for effective development co-operation (OECD, 2022_[40]; EU, 2020_[41]). In its development co-operation, Poland does not, like most DAC Members, acknowledge a broader definition and understanding of the term gender equality. Poland's interpretation of gender equality as equality between men and women is inspired by a traditionalist model of the family. In partner countries where gender equality and women's empowerment are a clear government priority, such as Moldova, how Polish Aid's projects are designed and implemented may risk being an obstacle to support to partner countries' priorities. Aiming for approaches to development and gender equality that are owned and led by partner governments will help ensure initiatives are adapted to context. Efforts to raise awareness across government on development might include why promoting gender equality is critical to sustainable development (EU, 2020_[41]).

There is significant room to improve the MFA's and Solidarity Fund's approach to risk management, including through awareness raising, training and improved information sharing. Embassy staff are responsible for providing contextual advice on the feasibility of all MFA-funded projects, with a focus on the capacity of the partner to deliver on the project. However, there is currently no routine procedure for addressing risks, including the risk of corruption or of sexual exploitation, abuse and harassment (SEAH), and risk analysis currently does not appear to be shared across relevant parts of the MFA or government. Where risk is considered, it focuses on fiduciary risks rather than operating risks, including for partners. In Moldova, the Solidarity Fund has adopted basic anti-corruption procedures in line with EU and USAID standards, including on declaring suspicions of fraud, conducting due diligence and checking EU blacklists. In 2023, the Moldovan Anti-Corruption Agency identified a case of corruption through one of the Solidarity Fund's local partners which led to internal reflections on adopting a reporting and whistleblower mechanism. This is a positive development. For Polish Aid to make further progress on its approach to managing risk, a more joined-up approach between the MFA in headquarters, embassies and the Solidarity Fund would be useful. With regard to corruption risks, better understanding and addressing potential disincentives to report allegations of fraud, corruption and SEAH would also improve risk management. Increasing awareness and understanding of risk management among all relevant staff through adequate training and guidance material will be important.

The response to Russia's war of aggression in Ukraine could serve as a turning point for Poland's crisis response mechanisms

Poland has made some changes to its systems for managing humanitarian and emergency response since the last DAC review. In 2017, a new governmental position of Minister for Humanitarian Aid was established in response to the increasing number of migrants and refugees in Europe. The office was dissolved in 2020 (MFA, 2023_[11]) and responsibility for humanitarian aid was reintegrated into DDC.

At the same time, the Solidarity Fund's scope of action has been expanded to deliver humanitarian aid in non-priority partner countries. Given Poland's relatively small humanitarian aid budget, this brings into question the coherence of its approach to humanitarian aid in relation to the MFA and Solidarity Fund's respective efforts, and the comparative advantage of different actors.⁴³ Clarifying the Solidarity Fund's added value in relation to the MFA's humanitarian assistance will be important.

Linking Poland's crisis prevention and response work with international efforts is good practice and demonstrates Poland's role internationally. The Ministry of the Interior and Administration co-ordinates much of Poland's crisis prevention and response work, for example, through the National Headquarters of the State Fire Service of Poland, the Main School of Fire Service and the Border Guard, which are engaged in Poland's partner countries. That Poland's civil protection efforts are linked up with the EU civil protection mechanisms is good practice. Poland has also sought to take on a greater leadership role internationally, convening for the first time a high-level donor conference in 2022 to address humanitarian needs in Ukraine. This demonstrated Poland's important convening power and potential role in the international community on crisis response.

In responding to Russia's war in Ukraine, Poland effectively responded to needs irrespective of the labels of humanitarian or development aid. Beyond its international advocacy, Poland has supported Ukraine in three main ways since Russia's full-scale invasion: 1) hosting Ukrainian refugees; 2) operating as a hub for transferring international aid through its border with Ukraine; and 3) directly delivering humanitarian aid in Ukraine. In doing so, Poland responded to needs irrespective of the labels of humanitarian or development aid, mobilising a range of institutions across government, with the BGK Aid Fund an example of how Poland can adapt when supported by political will (Box 2).⁴⁴ The conflict at Poland's borders has also shifted public support for the potential for Poland to remain present in emergencies, and has prompted recognition within the MFA and the government of the need for more joined-up efforts across its different humanitarian, development and peace efforts (MFA, 2023_[1]).

Drawing on this experience, Poland is now well-placed to build a modernised crisis response approach and overcome some administrative barriers to becoming more fit for fragility. Poland is ready to step up to a modernised crisis response system but remains constrained in several areas. Conflict sensitivity and risk analysis are usually provided by the MFA's geographic teams, diplomatic missions and CSOs working on the ground. However, this has generally been constrained by the lack of a co-ordinated and collective approach, including between DDC and other MFA departments (MFA, 2023_[1]). As the war in Ukraine forced a focus on analysis, DDC staff are now encouraged to take courses, such as the Nexus Essentials Course which is helping to raise understanding within the department. In practice, however, the continued separation of Poland's political co-ordination – for example, in the creation of new high-level positions responsible for Moldova and Ukraine – and the MFA is limiting the scope for a joined-up approach that aligns development co-operation and ODA to prevent crises, resolve conflicts and build peace. Addressing this will enable Poland to move towards a genuinely humanitarian-development-peace nexus approach (OECD, 2019_[42]). Moving away from annual calls for proposals including for humanitarian aid and building on the partnership approach taken with the International Committee of the Red Cross (Box 3) would also enable Poland to build more flexible partnerships that are critical for effective crisis response.

Box 2. Poland's crisis response to Russia's war of aggression in Ukraine offers lessons

Over 1.5 million refugees arrived in Poland following Russia's aggression against Ukraine in February 2022, triggering an immense mobilisation of support from Polish civil society, citizens and the government. Preparatory crisis management activities were carried out in late 2021 involving different levels of the administration. This included Polish *voivodes* (prefectures), services subordinate to the Ministry of Interior and Administration – the Polish Border Guard, the State Fire Service, the Police and the Government Agency for Strategic Reserves – and the Ministry of National Defence. Nevertheless, to provide rapid assistance for people fleeing Ukraine, the Polish government, in co-operation with civil society, needed to finance and co-ordinate new activities while managing the risks that crisis situations exacerbate, such as human trafficking.

Mobilising resources rapidly

A series of new laws were enacted following Russia's full-scale aggression to provide an enabling legal environment for Ukrainian refugees to be in Poland. Established under a special law on 12 March 2022, the [BGK Aid Fund](#) commenced operation on 17 March 2022. The main goal of the Aid Fund was to finance Polish support for refugees from Ukraine, including supplies for reception centre services; psychological and medical care, including the purchase of medical products; payment of family, parental and social assistance benefits to refugees; and nursery and school education. An example of how Poland can adapt rapidly when supported by political will and dialogue, the Aid Fund mainly raised financing through the sale of domestic and foreign bonds issued by BGK, with a guarantee from the State Treasury, equal to EUR 2 billion. Resources were also allocated from the state budget and treasury securities. As of March 2023, the Aid Fund had disbursed PLN 13 billion (approximately EUR 3 billion) through different Polish ministries and the Social Insurance Fund. BGK's involvement in Poland's response to the war in Ukraine, and planned engagement in Ukraine's recovery and reconstruction, are further examples of the BGK's evolving role.

Integrating counter-trafficking measures into the refugee response

An important dimension of Poland's refugee response was the focus on integrating counter-trafficking measures. Human trafficking was already [an area of concern](#) in Ukraine and surrounding countries prior to the war. The outbreak of an armed conflict raises significant risks of human trafficking inside the affected country, and for people fleeing across borders. Recognising these heightened risks, Poland integrated counter-trafficking considerations into its refugee response, involving significant cross-agency co-ordination. The support and protection of victims of human trafficking was carried out under the direction of the Minister of the Interior and Administration through a new National Intervention and Consultation Center for Victims of Human Trafficking (KCIK). Day-to-day activities were largely performed by Polish civil society organisations.

The KCIK's work included identifying victims of human trafficking, intervention, preventive counselling, consultations for institutions and organisations, and a specialised shelter for victims. Other measures included conducting information campaigns; developing procedures for government officials dealing with foreign minors crossing the border; and organising workshops for Police, the Border Guard and prosecutors. These efforts enabled Poland to reach more than 11 500 Ukrainian citizens through legal, psychological and material assistance.

Sources: Information shared by BGK and the Polish Ministry of Interior and Administration in the context of the peer review; UNODC (2022^[43]), *Conflict in Ukraine: Key Evidence on Risks of Trafficking in Persons and Smuggling of Migrants*, https://www.unodc.org/documents/data-and-analysis/tip/Conflict_Ukraine_TIP_2022.pdf; BGK (2023^[44]), "Aid Fund", <https://www.en.bgk.pl/funds/aid-fund>.

Recommendations

- As recommended in 2017 and recognising Poland's economic growth since joining the DAC and its commitment to allocating 0.33% of gross national income as ODA by 2030, Poland should set clear targets to build its ODA volume over the next 7 years and commit to this in budget planning.
- To achieve greater efficiency and impact in its bilateral ODA and as recommended in 2017, Poland should take a more programmatic approach, including by:
 - focusing its bilateral ODA budget on a narrow set of priority countries and themes and ensure that allocations match these priorities;
 - developing clear whole-of-government objectives for each priority partner country based on consultation with partner country stakeholders and in co-ordination with other providers; and
 - significantly reducing the number of calls for proposals to enable more substantial and sustainable projects, including phasing out those managed in MFA headquarters.
- To more effectively manage bilateral ODA, the MFA should:
 - develop guidance for the whole Polish system on managing for risk and integrating the environment and gender equality into all projects, drawing on DAC guidance and learning;
 - reinstate an evaluation function; and
 - put in place a simple approach for assessing if ODA allocations are contributing to the agreed objectives, building understanding among staff and at senior levels to generate demand for quality results information.
- To make the most of recent learning from the response to Russia's war of aggression in Ukraine and build a modern, flexible crisis response system, Poland should specify leadership and improve co-ordination across its humanitarian, development and peace engagement, and enable more strategic partnerships through multi-year funding.

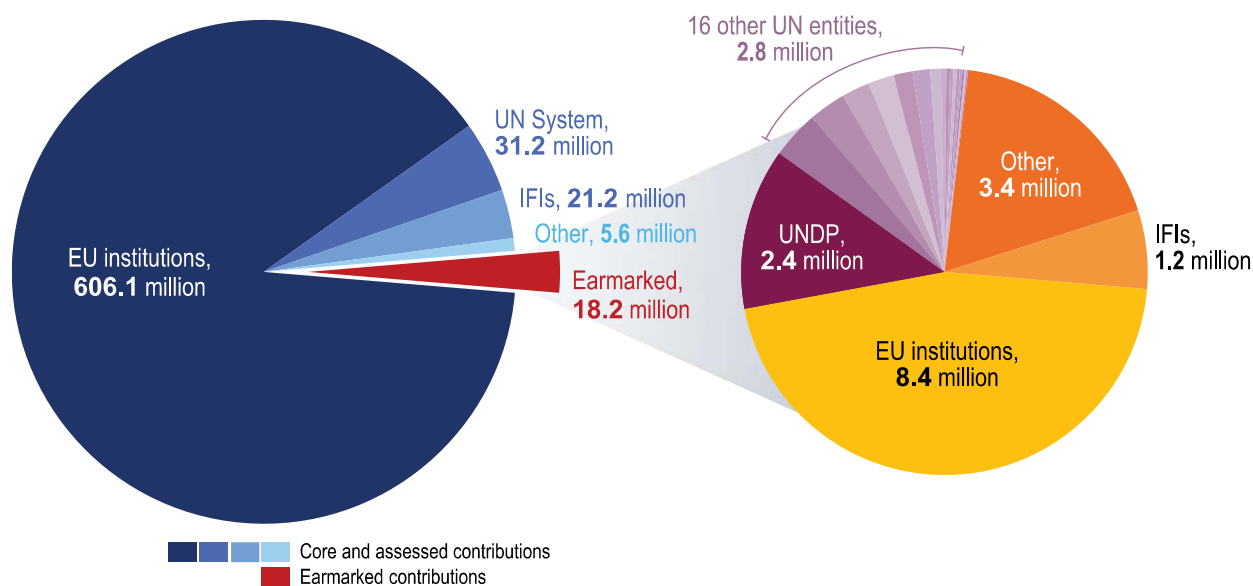
Multilateral and civil society partnerships

While core and assessed contributions account for the majority of Polish multilateral ODA, Poland could be more strategic and less fragmented in its earmarked allocations

Poland's multilateral co-operation accounts for the bulk of its ODA, but it continues to lack a strategy for allocating funds. Compared to the previous Multiannual Programme, the 2021-2030 Multiannual Programme is less clear on why and how Poland seeks to engage in and influence multilateral organisations and international fora. Beyond the European Union – which receives the majority of Polish multilateral ODA – the United Nations (UN) receives most of Poland's voluntary contributions, largely in line with its focus on human rights and civil protection. Total contributions to the UN have increased slightly since the last review, from USD 31.3 million in 2016-17 to USD 36.1 million in 2020-21 (constant prices). However, Poland is now providing more UN organisations with voluntary contributions of a smaller size, causing further fragmentation (Figure 7).⁴⁵ In total, Poland provided voluntary contributions to 24 partners in 2021, compared to 19 in 2017, while the overall amount declined from USD 79.9 million for 2016-17 to USD 17.8 million for 2020-21 (OECD, 2023^[7]). To the UN specifically, Poland provided voluntary contributions to 16 UN organisations in 2021, compared to 13 in 2017, with the overall amount declining from USD 6.6 million in 2016-17 to USD 5.2 million in 2020-21. While UN humanitarian partners appreciate Poland's open communication and flexible reporting requirements, they underline that voluntary contributions are decided upon at the end of the year, limiting predictability and undermining the impact Poland can have. As recommended in the 2017 peer review, rationalising and consolidating voluntary contributions to multilateral partners would help Poland increase scale and build longer term partnerships.

Figure 7. Earmarked voluntary contributions to the UN are increasingly fragmented


Total multilateral ODA, 2020-21 average (USD million, 2021 constant prices)



Notes: The core and assessed contributions category "Other" primarily comprises allocations to the Council of Europe and to the Organization for Security and Co-operation in Europe (OSCE). Besides UNDP, in 2020-21 Poland provided voluntary earmarked contributions to 16 separate UN entities, in most cases less than USD 500 000 each. The earmarked funding category "Other" primarily comprises allocations to the OSCE and, in 2021, Gavi, the Vaccine Alliance. It also includes smaller amounts to "unspecified other multilaterals".

IFI: International Financial Institutions.

Source: OECD (2023^[7]), *OECD Creditor Reporting System*, <https://stats.oecd.org/Index.aspx?DataSetCode=crs1>.

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While the MFA, the Ministry of Finance and the Central Bank co-ordinate to engage with international financial institutions, a greater focus on development outcomes would be beneficial.

The World Bank Group represented the third-largest category of Poland's multilateral ODA contributions in 2020-21 with USD 21.2 million – largely core contributions and regular capital increases – and Poland has served as Alternative Executive Director of its constituency since 2022. Staff in the Central Bank have expertise in development and strong networks, enabling co-ordination with the MFA to inform Poland's contributions to World Bank policies and strategy. According to the 2023 Annual Plan for Polish Aid, the primary objective of Poland's engagement with international financial institutions is to increase the export potential of Polish firms (MFA, 2022^[29]). Focusing on bringing development perspectives into Poland's engagement at board level, including from embassies in partner countries, will be important.

The European Union remains Poland's primary multilateral channel, but more can be done to prioritise development in its political engagement

EU contributions make up the largest share of Polish ODA and Poland works across government to influence the EU agenda.⁴⁶ Strengthening Poland's role in the European Union and leveraging EU funding to support Polish foreign policy is a priority (Sejm, 2023^[12]). Since Russia's large-scale invasion of Ukraine in February 2022, Poland has effectively used its influence in Brussels to mobilise EU support for Ukraine and its reconstruction, as well as for Moldova. Poland also engages actively in the European Union's Foreign Affairs Council and its Working Party on Development Cooperation and International Partnerships (CODEV-PI), along with the Neighbourhood, Development and International Cooperation instrument Global Europe to raise its priorities.

Poland's upcoming Presidency of the Council of the European Union comes at a strategic moment.

With its second Presidency taking place from January to June 2025, Poland has an important opportunity to build on the European Union's response to the war in Ukraine to raise awareness and show leadership. This includes the potential for Poland to lead on the importance of integrating international standards on environment, procurement, anti-corruption and human rights when engaging the private sector for the reconstruction of Ukraine. Delivering an effective Presidency will require investing in relevant capacities now, including in the MFA in Warsaw and in Brussels, ensuring staff posted to Brussels have experience in multilateral diplomacy as well as on development. Determining clear priorities and investing early in the Presidency could allow Poland to strengthen its reputation as a force for sustainable development. Portugal's approach to its Presidency in 2022 could be a useful reference point for Poland, including the value of early outreach, establishing credibility as an honest broker, and working with think tanks and research institutions to leverage analytical capacity and networks to inform policy debate (OECD, 2023^[45]).

Greater engagement with EU Member States at country level would better enable Poland to leverage its presence and added value

There is scope for Poland to better link its political efforts in Brussels with its country-level engagement. Poland's transition experience and EU and NATO accession have been central to its comparative advantage in supporting public reform processes in Eastern Partnership countries. EU Member States and partner governments value Polish expertise, and this is also evidenced by Poland's strong engagement in EU Twinning and TAIEX initiatives (Box 1). Since Russia's full-scale invasion of Ukraine, Moldova's and Ukraine's EU accession candidacy status, and the potential status for Georgia, is increasingly framing the development co-operation context in each country. While the Solidarity Fund is recognised among partner country stakeholders – thanks in part to its projects being recorded on national co-ordination platforms – Polish Aid's country presence has limited visibility among other development partners, reducing opportunities for co-ordination. Poland's high-level political engagement in Brussels is a valuable entry point for Poland to undertake more co-ordinated efforts to advance reforms in partner countries.

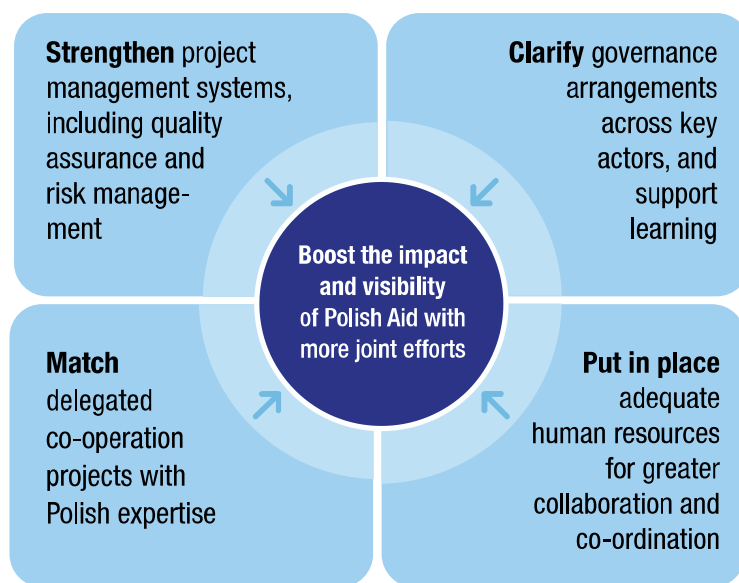
Poland could work more with other EU Member States to overcome barriers to joint programming.

Poland's limited ODA volume in its priority partner countries and annual budgeting constrains its ability to co-finance multi-donor programmes, as these are often multi-year with minimum financial thresholds. In Moldova, partners have had to adapt their programming around Poland's annual planning. Engaging in more joined-up efforts with other partners, in particular EU Member States, would enable Poland to increase its impact in priority countries. This requires more proactive engagement in EU co-ordination meetings and other donor co-ordination mechanisms to be visible and identify synergies in areas where Poland has a comparative advantage. This should be supported by greater embassy capacity to do so (see Fit-for-purpose institutional arrangements). Poland can build on its recent experiences engaging in Team Europe initiatives to be a more strategic EU partner in Eastern Partnership countries.⁴⁷ Likewise, the European Union could reinforce opportunities for smaller member states to join initiatives by ensuring processes support this. More clearly defined outcomes for the EU Global Gateway⁴⁸ would make it easier for some states to engage. Evolving the EU Global Gateway from a branding tool to a more substantive delivery mechanism to catalyse private sector investments with clear entry points for member states, including those without development finance institutions, will be important. As BGK evolves, there is scope for it to drive Poland's efforts to increase its participation in the European Union's Global Gateway.

The Solidarity Fund's recent EU pillar assessment creates additional opportunities to work with EU member states but will require further investments in systems.

In Moldova, the European Union has sought out the Solidarity Fund for its strong local network, use of local staff and understanding of country context. Following its successful EU pillar assessment in February 2023, the Solidarity Fund must now strengthen its administrative capacities to absorb larger volumes of EU funds and put in place project management systems to manage for risk and mainstream gender equality and environmental considerations into projects as per the outstanding recommendations of the pillar assessment process (see Poland's bilateral programme: Priorities and programming). To maximise the opportunities and benefits of potential EU delegated co-operation, Poland should focus on ensuring that delegated co-operation opportunities are complementary and aligned with Poland's areas of expertise. Strengthening the links between the Solidarity Fund and Poland's embassies would increase coherence in the context of future delegated opportunities. Greater collaboration and information sharing could also ensure that the Solidarity Fund's modernisation efforts driven by its EU pillar assessment can also contribute to improving the systems and knowledge across DDC and the MFA.

Figure 8. Advancing reforms will enable Poland to make the most of EU delegated co-operation



Box 3. Poland's partnership with the International Committee of the Red Cross

Poland faces the challenge of engaging in longer term partnerships with humanitarian actors to enhance funding predictability and more effectively contribute to shared outcomes. Poland's memorandum of understanding (MoU) with the International Committee of the Red Cross (ICRC) shows that more effective partnerships are possible, including in a resource-constrained environment.

In 2018, Poland concluded an MoU with the ICRC to promote international humanitarian law and protect people in conflict and crisis areas. The MoU was signed between the President of the ICRC and the Polish Minister of Foreign Affairs. The MoU's annual funding provision of CHF 500 000 (USD 524 000) enables Poland to communicate its funding plans early in the year while also guaranteeing a minimum contribution. When tensions started to build in Ukraine in late 2021, Poland was swift in releasing its annual contribution to the ICRC. Russia's large-scale invasion of Ukraine in 2022 triggered more intense high-level communication, further shaping the partnership's strategic dimension supported by systematic annual strategic dialogues. Polish officials also meet regularly with the ICRC at expert level, including briefings on matters of mutual interest.

Through this approach Poland has become a more predictable partner, overcoming the current barriers to multi-year funding. The MoU has led to a more mature partnership beyond financial contributions and includes knowledge sharing to support Poland's ambition to be a leading voice in crisis response.

Sources: Information shared by the Polish Ministry of Foreign Affairs and the ICRC in the context of the peer review; MFA (2023^[1]), "Poland OECD-DAC Peer Review Self-Assessment" (unpublished). OECD exchange rate 1 USD = CHF 0.955 (2022) (OECD, 2023^[46]).

Fully harnessing partnerships with civil society organisations requires a longer term approach to funding and partnering

Poland's policies recognise the key role civil society plays in Polish Aid. The 2021-2030 Multiannual Programme includes a commitment to support the conditions in which "CSOs in the area of development co-operation can flourish" (Government of Poland, 2021^[4]). Strengthening the potential of CSOs is also a commitment in the MFA's Programme of Co-operation with CSOs for 2021-2025 (MFA, 2021^[47]). The Solidarity Fund's focus on democratisation and human rights has also tended to draw on strong partnerships with CSOs (Box 4) and building civil society and promoting inclusive decision making remains a stated priority for Polish Aid in Belarus, Georgia and Ukraine (MFA, 2022^[29]). Through the Solidarity Fund's local civil society partnerships Polish Aid has been able to provide continued support to Belarusian media (Box 5).

Box 4. Poland's Solidarity Fund: Empowering local actors to co-design and manage development solutions

Based on its own transition experience, Polish Aid's approach to development co-operation recognises that meaningful democratic reform requires working at the local level and across society to build broad support and lasting change. The Solidarity Fund – a State Treasury Foundation created by an act of the Polish parliament – makes use of its strong country presence and empowers local staff in partner countries to generate citizen and institutions' co-responsibility for development processes.

The Solidarity Fund established local representative offices in Moldova in 2012, and in Georgia and Ukraine in 2019. Except for the country directors, these offices are entirely staffed by nationals of the respective countries. The Solidarity Fund also embeds staff in local institutions to transfer expertise and knowledge. Offering local employment and salary conditions has helped to create incentives for local

staff to remain in the administration after the end of the project. This approach has generated buy-in by national authorities underpinned by enhanced capacity of local partners. Local authorities are also more able to participate in and influence national decision making, leading to more sustainable changes in a partner country.

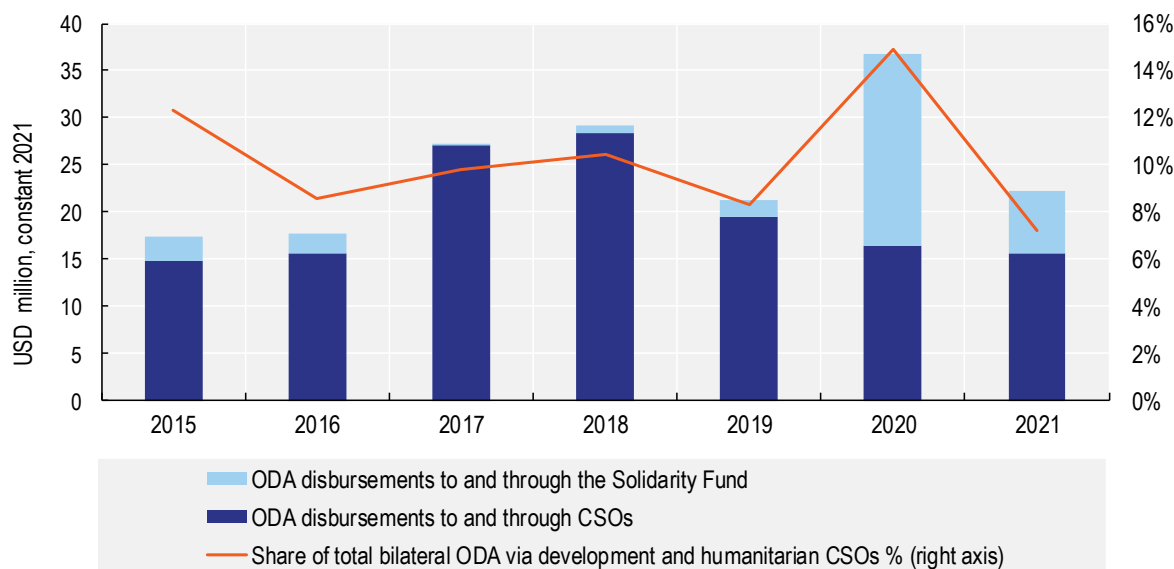
Development partners recognise that the Solidarity Fund's strong local presence, local networks and bottom-up approach fills an important gap and helps to maximise developmental impact by leveraging the capacities and knowledge of local actors. At the same time, transferring staff to local partners can make efficient team management more challenging for the Solidarity Fund itself, and designing and implementing effective exit strategies remains an area of ongoing internal reflection and work.

Note: This practice is documented in more detail on the Development Co-operation TIPs – Tools Insights Practices platform at: <https://www.oecd.org/development-cooperation-learning/practices/empowering-local-actors-by-prioritising-local-capacity-and-networks-poland-s-solidarity-fund-25780d66/>

Sources: Information shared by the Solidarity Fund and Moldovan CSOs (see Annex C) in the context of the peer review; Solidarity Fund (2021^[48]), *Annual Report*, https://solidarityfund.pl/wp-content/uploads/2022/10/FSM_ANNUAL-REPORT-2021_EN.pdf; Eastern Partnership Civil Society Forum (2020^[49]), *Case Study Report on the Implementation of the LEADER Approach in the Republic of Moldova*, https://leap-csf.eu/wp-content/uploads/Moldova-Case-Study_LEADER-approach_Report-EN.pdf.


Nevertheless, partnerships are constrained by declining funding, predictability and trust. Polish ODA provided to and through CSOs declined from a peak of USD 28.5 million in 2018 to USD 15.7 million in 2021, representing 5.1% of total bilateral ODA (Figure 9). Poland also does not provide core support to CSOs and project-based funding fluctuates, in part linked to Poland's reliance on annual budgeting and programming (see Poland's bilateral programme: Priorities and programming).⁴⁹ This lack of funding predictability undermines CSOs' strategic planning and investments in capacity strengthening. With the Solidarity Fund increasingly implementing projects in addition to being a sub-granting organisation, CSOs may also feel they are being cut out.

Figure 9. Funding via development and humanitarian civil society organisations has been declining



Notes: ODA: official development assistance; CSOs: civil society organisations. Poland's reporting does not distinguish between funding to the Solidarity Fund that is then subgranted to CSOs or to other types of organisations. The uptick in funding to the Solidarity Fund in 2020 is mainly accounted for by USD 13.6 million in humanitarian aid to Belarus to support its COVID-19 response.

Source: OECD (2023^[77]), *OECD Creditor Reporting System*, <https://stats.oecd.org/Index.aspx?DataSetCode=crs1>.

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Simplified funding procedures and tools would help to reduce transaction costs. Many Polish CSOs engaged in development and humanitarian activities are relatively small and lack the financial reserves to bridge the gap between the start of projects and late disbursements by the MFA. As noted above, the effective management of annual calls is being undermined by, among other challenges, slow decision making (see Poland's bilateral programme: Priorities and programming). To streamline the project management cycle, DDC has undertaken welcome efforts to digitalise application and monitoring processes, including through an online tool which was used for the first time for the 2021 call for proposals.⁵⁰ Nevertheless, using the tool's reporting function is time consuming and a more flexible approach that enables partners to report results in a free form may be useful. Focusing on mechanisms that ensure predictability within the call for proposal process would help partners to design and implement more effective projects. Looking ahead, moving towards core funding or a partnerships model that does not rely on annual calls for proposals would help address these challenges.⁵¹

Limited opportunities for consultation and dialogue are compounding programming challenges and undermining trust. The MFA undertakes public consultations around its multiannual programmes and annual plans as required by law (Government of Poland, 2011^[8]). At the project level, informal exchanges between DDC and implementing partners facilitates flexibility, enabling partners to adapt projects to evolving needs or changes in context within the constraints of an annual project cycle. However, there is significant scope for more regular and meaningful dialogue with DDC, for example by ensuring reasonable consultation periods on policy documents and providing fora to discuss and consult when setting priorities, including before starting preparations of call for proposals. Providing timely and clear feedback on calls for proposals would also support mutual accountability and help to build trust.

There is potential to better mobilise civil society to raise awareness of development co-operation across Polish society and at a political level

Poland's development co-operation policy recognises the value of effective communication efforts to boost its image and strengthen bilateral ties (Government of Poland, 2021^[4]). Guidelines exist to support the consistent use of the Polish Aid brand in partner countries (MFA, 2023^[50]) and since 2018, DDC has been developing a public IT tool for presenting ODA data. Once released, this may support greater transparency and provide more opportunities to communicate on Polish Aid activities.⁵² Applying the Polish Aid branding consistently across all Polish ODA activities, not just those managed by the MFA, may also support more coherent messaging in partner countries and improve the visibility of Poland's efforts.

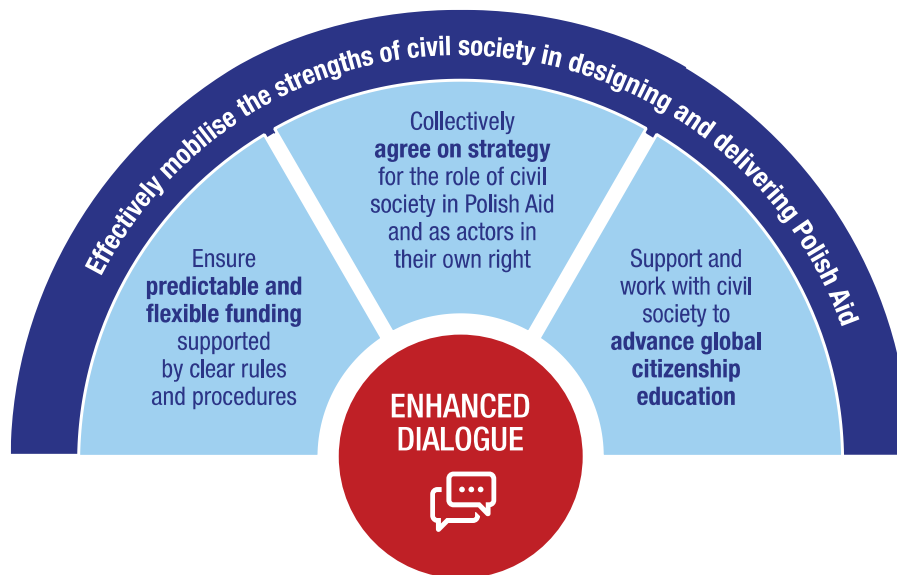
Recognising the need to go beyond branding and information sharing, the MFA regularly commissions opinion polls to build a baseline of Polish citizens' views on and support for development co-operation. This is good practice and can help inform more effective messaging to the Polish public around development assistance. Nevertheless, polls consistently find that Polish Aid's development co-operation activities are not widely known to Polish citizens, who tend to associate it mostly with humanitarian aid (MFA, 2022^[51]).

Allocating resources, developing a strategy and facilitating informed public debate would help to raise development awareness at home more effectively. Funding for development awareness activities has declined significantly in recent years, from a peak of USD 1.21 million in 2017 to USD 60 thousand in 2021 (OECD, 2023^[7]). At present, DDC's Communication and Global Education Section lacks the resources to develop a more strategic approach and have real impact. As noted above, the absence of development co-operation in the Foreign Minister's annual exposé to parliament is a missed opportunity to sensitise the Polish media and politicians to the role of ODA in Poland's contributions to addressing regional and global challenges. Poland's 2023 Voluntary National Review also identifies opportunities to improve efforts to raise awareness of Poland's contributions to sustainable development among the Polish public. Recommendations included involving youth in the debates and conferences where decision makers

are present, and increasing knowledge sharing and the sustainability of civic organisations, through better and more reliable funding (Government of Poland, 2023^[52]). Poland has a compelling and longstanding narrative of “solidarity” on which to build. Continuing to invest in that narrative will be important, to explain to the Polish public how they contribute to Poland’s support to a peaceful and stable world, and to build the basis of public support needed to strengthen Poland’s development assistance.⁵³

Scaled-up collaboration with civil society would strengthen efforts to deliver on Poland’s commitment to global education. Global education is one of the three pillars of Polish development co-operation alongside development assistance and humanitarian aid (Government of Poland, 2021^[4]).⁵⁴ Partners point to a socio-political climate in Poland that makes the uptake of global education by the responsible actors challenging (Szuleka and Kalisz, 2021^[53]; Narsee et al., 2023^[54]). Inserting global education meaningfully across school curricula would require more structured co-operation between relevant actors, including the Ministry of Education and Science, other government departments, and Polish civil society (Aleksiak and Kuleta-Hulboj, 2022^[55]). Poland benefits from a rich landscape of actors active in global education who are well placed to support these efforts. Poland could also learn from the experiences of other DAC members, which highlight the importance of engaging closely with the education system; tailoring efforts to audiences; and building strong partnerships, including with civil society (DevCom, 2022^[56]). Establishing a framework for co-operation between sectors and government institutions would support progress in this area and better enable Poland to deliver on its own commitments and priorities. Including global education as a standing agenda item within the Policy Council’s regular discussions could be one way of helping to advance this cross-sectoral and stakeholder work.

Figure 10. Mobilising the strengths of civil society for Polish development co-operation



Box 5. Working in politically constrained contexts: Support to Belarusian civil society and media

The disputed August 2020 Belarusian presidential election caused a long wave of protests followed by a violent and systematic crackdown on all opposition, including the arrest of political activists, journalists

and civil society organisations. This forced Poland to rethink its approach to promoting democracy and civil rights in Belarus.

To deliver on its commitment to promoting democracy, Poland seeks to engage at all levels, even with autocratic governments. Following the events of the election, the focus of Poland's support to Belarus became concentrated on democratic participation and human rights, including greater funding for the Warsaw-based television station Belsat, which broadcasts in Belarusian. In addition, in September 2020, the Polish Prime Minister launched the whole-of-government "Solidarity with Belarus" plan to support Belarusian citizens that fled the regime. To implement the plan, Poland built on the Ministry of Interior and Administration's good political connections with Belarusian opposition actors and the Polish Solidarity Fund's existing networks in Belarus. Poland had to be flexible with its systems and processes to not reveal the identity of its local implementing partners to safeguard their security. Finally, Poland used its influence within the European Union to hold an extraordinary EU Summit on Belarus and mobilise EU member states into taking further action, including sanctions.

As a result, Polish Aid helped to provide a counterbalance to the threats of mis- and disinformation by supporting independent Belarusian media, educational and civic initiatives. Belarusian asylum seekers in Poland, especially families with children, received support and additional Belarusian students, scientists and teachers could continue their studies and work in Poland.

There are important lessons to retain from this approach. Staying engaged can help to maintain local networks; protect democratic space, even in an indirect way; and keep channels for dialogue open. A joined-up approach can leverage each actor's strengths for greater impact. Leadership at the highest political level can drive effective co-ordination and mobilise political momentum across government and internationally. Operating in autocratic contexts requires flexibility to work around the challenges of having to work through local partners in highly informal settings or to preserve their safety.

Sources: Information provided by the Ministry of Foreign Affairs and the Solidarity Fund in the context of the peer review; Solidarity Fund (2020^[57]), *Annual Report*, https://solidarityfund.pl/wp-content/uploads/2021/11/FSM_RAPORT-ROZNY-2020_EN.pdf; MFA (2023^[11]), "Poland OECD-DAC peer review self-assessment (unpublished)"; Economist Intelligence Unit (2023^[58]), "Belarus – In brief", <https://country.eiu.com/belarus>.

Recommendations

- Poland should draw on its development co-operation experience to inform its political efforts in Brussels including in the lead up to its upcoming EU Presidency, and clarify how Polish Aid will benefit from future EU delegated co-operation, ensuring systems and capacities are in place to do so.
- To better reflect the important role of civil society in policy making and to deliver on Poland's commitment to support civil society organisations working in development, Poland should:
 - address barriers to providing core and longer-term funding to civil society organisations;
 - undertake systematic and meaningful consultations with civil society; and
 - together with civil society, establish a vision for civil society's role in Polish development co-operation, including as actors in their own right.

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Notes

¹ Gross domestic product (GDP) per capita based on purchasing power parity in 2022. See: <https://stats.oecd.org/index.aspx?queryid=61433>. Based on 2022 data, Poland now follows Spain and is ahead of Hungary and Portugal among EU Member States based on GDP PPPs. See also: <https://www.oecd.org/newsroom/poland-structural-reforms-and-accelerating-the-digital-and-green-transition-would-help-to-further-raise-living-standards.htm> and Eurostat's 2022 "flash estimate": https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Purchasing_power_parities_and_GDP_per_capita_-_flash_estimate.

² The amendments related to article 10 point 3, specifically removal of the sentence: "Fundacja nie może realizować zadań z zakresu współpracy rozwojowej na podstawie ust. 1 lub 2" ("The Fund cannot carry out tasks in the field of development cooperation pursuant to paragraph 1 and 2 from 10 article."). In 2020, the MFA sought Solidarity Fund involvement in providing COVID-19 related assistance in Poland's priority partner countries. However, the MFA could not formally delegate this task to Solidarity Fund under the act and the Solidarity Fund could not use money received under Polish Aid to support these activities. The amendment gave the MFA the right to delegate to the Solidarity Fund humanitarian assistance tasks in a wider range of contexts.

³ The Eastern Partnership is a joint initiative involving the European Union, its Member States and six Eastern European Partner countries: Armenia, Azerbaijan, Belarus, Georgia, the Republic of Moldova and Ukraine. It was launched in 2009. For more information, see: [https://www.eeas.europa.eu/eeas/eastern-partnership_en#:~:text=The%20Eastern%20Partnership%20\(EaP\)%20is,Republic%20of%20Moldova%20and%20Ukraine](https://www.eeas.europa.eu/eeas/eastern-partnership_en#:~:text=The%20Eastern%20Partnership%20(EaP)%20is,Republic%20of%20Moldova%20and%20Ukraine).

⁴ There is no strict allocation based on portfolio. Currently Minister Jabłoński, who serves as the National Coordinator of Polish Development Cooperation, is responsible for Africa and Middle East Policy. The previous minister, Minister Przydacz, was responsible for Co-operation and Eastern Policy, as well as Economic Diplomacy. See: <https://www.gov.pl/web/diplomacy/marcin-przydacz-appointed-mfa-undersecretary-of-state>.

⁵ At the request of the MFA, the Ministry of Finance releases the relevant funds from the development assistance budget for the implementation of the programme or project concerned (MFA, 2023_[11]).

⁶ To strengthen and optimise its business model and free up staff time for other strategic activities, the MFA should rationalise the overall number of channels for the special budget reserve and streamline calls for proposal (OECD, 2017_[33]).

⁷ Poland's self-assessment notes: "Rising awareness among Polish diplomats and civil servants on the role of development cooperation should be considered key to improve expertise" (MFA, 2023_[1]).

⁸ From Poland's self-assessment: "In 2017 a new governmental position of the Minister for Humanitarian Aid was established. The aim was to strengthen Polish humanitarian aid efforts during the migration crisis. The division of competences between the newly created office and the DDC humanitarian unit was not entirely clear, which affected the coherence and effectiveness of the Polish Aid system. Against the backdrop of the receding migration crisis, the office was dissolved in 2020 and its responsibilities were transferred back to DDC in the MFA" (MFA, 2023_[1]).

⁹ For more information, see: <https://www.gov.pl/web/funds-regional-policy/jadwiga-emilewicz2#:~:text=Prime%20Minister%20Mateusz%20Morawiecki%20appointed,State%20on%2015%20May%202023>.

¹⁰ Poland's current list of priority partner countries and territories, as described in the 2021-2030 Multiannual Programme, are four Eastern Partnership countries – Belarus, Georgia, Moldova and Ukraine – and six non-European countries and territories – Ethiopia, Kenya, Lebanon, Senegal, the United Republic of Tanzania, and the West Bank and Gaza Strip.

¹¹ As of mid-2023 BGK has 15 posts in the Department for International Development.

¹² For example, in 2023, the European Commission and BGK signed an InvestEU guarantee agreement worth up to EUR 242 million, making BGK an InvestEU implementing partner authorised to offer directly, without intermediaries, investment loans backed by the InvestEU guarantee as a new product in BGK's portfolio. For more information, see: https://investeu.europa.eu/news-and-events/news/european-commission-and-polands-bank-gospodarstwa-krajowego-sign-agreement-unlock-eu484-million-2023-04-20_en. Under EFSD+, the European Commission has also allocated EUR 115 million in guarantees for BGK for support for digitalisation processes in Africa. Currently BGK is finalising a guarantee agreement with the European Commission (expected end-October 2023) for Moldova in partnership with Solidarity Fund. BGK is also preparing its pipeline of projects for the Ukraine Facility Pillar II (Ukraine Guarantee).

¹³ BGK joined Joint European Financiers for International Cooperation (JEFIC) network in March 2023. Other members are the French Development Agency (AFD), the Spanish Agency (AECID), the Italian Financial Institution CDP and Germany's KfW. The network is based on a common vision for a joined-up European development financing system, and the different organisations commit to pool their resources and mobilise public and private capital for increased investment towards the SDGs. For more information, see <https://www.afd.fr/en/jefic>.

¹⁴ Very brief summaries of some Policy Council meetings are published on line. For more information, including summaries of the meetings, see: <https://www.gov.pl/web/polskapomoc/posiedzenia-rady-programowej-wspolpracy-rozwojowej2>.

¹⁵ Current membership comprises representatives of 11 ministries (usually attended at the director level), both chambers of parliament, select CSOs, academia and the Confederation of Polish Employers. See <https://www.gov.pl/web/polskapomoc/powolanie-nowego-czlonka-rady-programowej-wspolpracy-rozwojowej-iii-kadencji> and www.gov.pl/web/polskapomoc/rada-programowa-wspolpracy-rozwojowej.

¹⁶ The Solidarity Fund was established as a foundation of the State Treasury in 1997 at the initiative of the President of Republic of Poland. Under the name Polish Foundation for International Cooperation for Development "Knowing How", it focused on assisting countries undergoing market transformations and

implementing projects in Ukraine, Moldova, Kazakhstan, and Georgia. In 2005 its activities were suspended. However, in 2011, in the context of Poland's growing commitment to development co-operation and the need to support democratic transformations in other countries, the Ministry of Foreign Affairs took the decision to reactivate the Fund. The Development Cooperation Act, adopted on 16 September 2011, allowed the Minister for Foreign Affairs to entrust the Solidarity Fund with activities in the field of development co-operation. For more information, see: <https://solidarityfund.pl/en/kim-jestesmy/o-nas/>. A 2014 framework agreement between the MFA and the Solidarity Fund describes the Solidarity Fund's tasks as a) implementation of development cooperation tasks in countries where, in the opinion of the Minister of Foreign Affairs, there are special political conditions, b) handling tender competitions leading to the selection of entities implementing development cooperation tasks (Government of Poland, 2014^[67]).

¹⁷ The thematic focus has shifted in recent years from democracy and human rights to, among other issues, local, rural and urban development; entrepreneurship; and civil protections (Solidarity Fund PL in Moldova, 2021^[60]).

¹⁸ See OECD (2023^[61]).

¹⁹ At the time of the last review, there were 81 Poland-based employees dedicated to development co-operation across the government, half of which were in DDC (around 40). An additional 16 full-time equivalent staff were responsible for development co-operation in embassies and permanent representations (OECD, 2017^[33]).

²⁰ Many bilateral and multilateral organisations have staff welfare policies in place to support staff working in contexts of crisis. In recognition of the physical and psychological pressures facing staff working in crisis or fragile contexts, and as part of organisations' approach to duty of care, some DAC members include shorter posting periods and additional leave for staff posted to "hardship countries", for example. The COVID-19 pandemic further highlighted the importance of duty of care for development and humanitarian organisations working in crisis contexts, triggering further reflection and action across DAC members in this area. See for example: *Mental health and international development Launch of DFID's Position Paper and voices from the field*, <https://www.youtube.com/watch?app=desktop&v=DOKNEtGw6Uc> and the United Nations' Healthy Workforce resources page: <https://www.un.org/en/healthy-workforce-home>, which includes access to staff and stress counsellors.

²¹ For example, the EU DEVCO Academy: <https://webgate.ec.europa.eu/intpa-academy/course/index.php?categoryid=16> and the International Training Centre of the International Labour Organization: <https://www.itcilo.org/courses>.

²² Offering mobility across embassies, including at a regional level, is one way DAC members have successfully provided career growth to local staff while continuing to benefit from their knowledge of context and expertise.

²³ Principles 11 and 12 of the OECD [Recommendation on Public Service Leadership and Capability \(OECD/LEGAL/0445\)](#) are particularly relevant. These are: develop a long-term, strategic and systematic approach to people management based on evidence and inclusive planning; and set the necessary conditions for internal and external workforce mobility and adaptability to match skills with demand.

²⁴ Many providers complement in-house teams by buying and borrowing skills. For example, Sida has managed staff capacity gaps with regard to environmental expertise through outsourced policy help desks

to augment its policy expertise on a range of issues. Sida has a series of regional gender help desks and has also used help desks for human security and humanitarian assistance, democratic governance, and human rights. These are staffed by consultants or a consortium of organisations and provide a range of support (OECD, 2019^[63]). For more information on Sida's Global Gender Help Desk, see: <https://ncgsw.se/project/global-gender-helpdesk-sida>. The Czech Development Agency outsourced contract preparation and procurement functions, and the United Kingdom engaged an external company to help monitor its humanitarian portfolio in Somalia and Yemen. USAID combines in-house technical staff with private sector specialists procured through contracts. Drawing on other donor or implementing partners' skills and knowledge by borrowing staff can also help build expertise in priority areas. For example, the French Development Agency (AFD) and Austria's development bank OeEB have drawn on experts from Germany's development bank, KfW, to bring in expertise on innovation.

²⁵ The five priority policy coherence areas for 2023 are: 1) illicit financial flows in the areas fighting tax evasion and money laundering (led by the Ministry of Finance); 2) fighting illegal trade in endangered plant and animal species (Ministry of Climate and Environment); 3) implementation of corporate social responsibility standards (Ministry of Development Funds and Regional Policy); 4) sustainable cities and communities; and 5) climate, including the natural environment and the seas (Ministry of Climate and Environment) (MFA, 2022^[29]).

²⁶ The 2021-2030 Multiannual Plan states that "The Minister of Foreign Affairs, in cooperation with the competent ministries and offices, will define priority areas of action as part of Policy Coherence for Development. These areas will be included in the Development Cooperation Plan for 2021 and updated in subsequent years. Public administration bodies will compile annual reports on implementing SDGs in these areas. The documents will be submitted to the Development Cooperation Policy Council affiliated with the Minister of Foreign Affairs" (Government of Poland, 2021^[4]).

²⁷ Poland's ranking on the Commitment to Development Index improved slightly, from 31st position in 2020 to 30th in 2021. Poland's performance in the 2023 Index improved slightly to 28th position. See: <https://www.cgdev.org/cdi#/>.

²⁸ Co-presidents of the ACP-EU Joint Parliamentary Assembly made the following statement in response to the European Council's decision to extend the Cotonou Agreement between the European Union and the member states of the Organisation of African, Caribbean and Pacific States (OACPS) by four months: "While we acknowledge the necessity of the extension of the Cotonou Agreement to avoid a legal void from 1 July that would have brought to an end the legal basis of the joint OACPS-EU institutions, we deplore the continued blockage of the signature of the Post-Cotonou Agreement by EU Member States, first Hungary and now Poland. It is unacceptable that one or two EU Member States, for internal reasons, can undermine a partnership of over one hundred countries from four different continents, constituting a third of the UN membership, an important platform for advancing multilateralism" (European Parliament, 2023^[62]).

²⁹ DAC members switched to grant equivalent accounting of bilateral sovereign and multilateral loans in 2019 with the publication of the 2018 ODA. The new "grant equivalent" headline ODA figures are no longer comparable with the historical ODA series on "cash basis". In the cash basis, the net capital flow over the lifetime of a loan is nil because repayments of principal are deducted when made; interest payments are not taken into account. In the grant equivalent method, both principal and interest payments are considered but discounted to the value they represent in today's money.

³⁰ For more information, see the OECD “In-donor refugee costs in ODA” database at: https://qdd.oecd.org/subject.aspx?Subject=IN-DONOR_REFUGEE_COSTS.

³¹ In 2020 24.2% of ODA covered by the Recommendation was untied and in 2019 just 9.6% of ODA covered by the Recommendation was untied (OECD, 2022^[25]).

³² This is the result of an order of the Minister of Finance, which established an Inter-ministerial Committee on Intergovernmental Credit Co-operation (Official Journal of the MF of 2019, item 97). Pursuant to §1 of the Ordinance, the Committee is a subsidiary body of the Minister responsible for public finance. Based on §4 of the Ordinance, the Committee is composed of representatives of the Ministry of Finance (chair), the Ministry of Economy (now the Ministry of Economic Development and Technology) and the Ministry of Foreign Affairs. Representatives of other entities, including BGK and the Polish Investment and Trade Agency, may be invited to participate in the work. Since 2022, a dedicated team within the MFA is tasked with evaluating the development impact of future loans. The team is made up of representatives from DDC, geographic departments in the MFA, the MFA’s Legal Department, and the Economic Cooperation Department, which has observer status (MFA, 2023^[1]).

³³ Poland’s current priority countries and territories are four Eastern Partnership countries (Belarus, Georgia, Moldova and Ukraine); two Middle East countries and territories (Lebanon and the West Bank and Gaza Strip), where Poland mostly provides humanitarian assistance and scholarships; and four sub-Saharan African countries (Ethiopia, Kenya, Senegal and Tanzania), primarily tied loans in exchange of agricultural exports (Government of Poland, 2021^[4]). Ethiopia, Kenya and Tanzania each received ODA loans from Poland between 2015 and 2019. Lebanon started receiving a significant share of humanitarian ODA from 2017 and the West Bank and Gaza Strip has also been a long-standing recipient of Polish humanitarian assistance.

³⁴ Amounts to priority partner countries in Africa are generally more – for example, an average of USD 6 million to Tanzania per year over 2020-21 and USD 3 million to Kenya – but are primarily tied aid loans and therefore significantly fluctuate year on year.

³⁵ According to the Multiannual Development Plan “Solidarity for Development”, Poland will implement thematic priorities, in particular taking into account the following SDGs: 16. Peace, justice and strong institutions; 4. Quality education; 8. Decent work and economic growth; 10. Reduced inequalities; 3. Good health and well-being; 6. Clean water and sanitation; 11. Sustainable cities and communities; and 13. Climate action. The 11 thematic priorities in the 2021-2030 Multiannual Plan are: 1) peace, justice and strong institutions; 2) education; 3) decent work; 4) entrepreneurship; 5) reducing inequality; 6) sustainable cities; 7) regional development planning and planning of rural areas; 8) health; 9) clean water and sanitary conditions; 10) forests and biodiversity; and 11) renewable energy sources.

³⁶ According to OECD research (Budgeting and Public Expenditures Division of the Directorate for Public Governance), Poland’s state budgeting process sets the budget one year in advance, although certain capital elements of the budget are set in multi-year envelopes. While Poland has a multi-year framework in the sense of preparing three-year projections, it is not “binding” in setting expenditure ceilings, so the budget is, for all practical purposes, determined on an annual basis. Line ministries have substantial flexibility in reallocating funds across sections of their individual budget (OECD, 2019^[65]).

³⁷ See the Polish Aid News website, which lists the announcements and results of the different annual call for proposals processes, at: <https://www.gov.pl/web/polishaid/news2>. For examples of annual plans, see: <https://www.gov.pl/web/polishaid/programming>.

³⁸ Based on the MFA's 2021-22 own data, approximately half of all projects implemented within the call for proposal system are currently multi-year projects.

³⁹ The Solidarity Fund supported an urban development initiative in Moldova to develop a locally designed and relevant methodology as part of the [LEADER Approach](#). The following year, the MFA funded a separate Polish organisation to undertake a similar urban development initiative in the same town, using Polish rural development initiatives, not taking into account the local and national methodologies developed through the LEADER approach.

⁴⁰ Annual monitoring reports include reflections on results. Monitoring reports consulted include those conducted in 2021-22 for Ethiopia, Lebanon, Senegal, and the West Bank and Gaza Strip, and those conducted in 2018-19 for Georgia, Kenya, Moldova, Tanzania, Ukraine, and the West Bank and Gaza Strip.

⁴¹ Poland's annual plans include a "Matrix of outcomes" with the expected outcomes of Polish development co-operation in the context of the SDGs and the 2030 Agenda under the programme, referring to all countries taken together. There is no annual synthesis of how Poland is contributing to these outcomes.

⁴² As per the 2022 annual development programme, the horizontal priority of equal opportunity for men and women is being referred to as "equal opportunities and protection against persecution and discrimination" (MFA, 2022^[29]). Call for proposal documents for 2023 refer to both "equal opportunities for men and women" and "equal opportunities and protection against persecution and discrimination", potentially causing confusion around their implementation (MFA, 2023^[38]).

⁴³ On 28 October 2020, Article 2 Clause 1 Point 2 of the Development Cooperation Act (*Journal of Laws of 2021*, Item 1425) was amended, allowing, in addition to supporting developing countries, the Solidarity Fund to provide humanitarian aid to other countries in case of emergency (Government of Poland, 2011^[8]).

⁴⁴ This includes the Chancellery of the Prime Minister, the Ministry of the Interior and Administration, the Governmental Strategic Reserves Agency, and the MFA.

⁴⁵ Through its contributions to the United Nations, Poland aims to obtain a seat on the institutions' governing board to influence the organisations' strategies. The MFA prioritises UN humanitarian organisations for civil protection in conflict areas and to support humanitarian crises Poland is unable to access for security reasons (MFA, 2022^[29]).

⁴⁶ EU contributions make up the largest share of Polish ODA and increased from USD 457.8 million in 2016-17 to USD 606.1 million in 2020-21 (OECD, 2023^[7]).

⁴⁷ Poland has participated in three Team Europe Initiatives in Eastern Partnership countries, on EU-funded vaccine preparedness, the manufacturing and deployment programme, and promoting democracy. It has also participated in seven country-specific Team Europe Initiatives, including for Armenia, Georgia and Moldova (EU, 2023^[59]).

⁴⁸ The European Commission launched Global Gateway in 2021, as the European strategy to boost smart, clean and secure connections in digital, energy and transport sectors, and to strengthen health, education

and research systems across the world. Global Gateway aims to mobilise up to EUR 300 billion in investments through a “Team Europe approach.” For more information, see: https://international-partnerships.ec.europa.eu/policies/global-gateway_en.

⁴⁹ The MFA’s “Programme of Cooperation with the Non-governmental Organizations for the Years 2021-2025” programme requires DDC to publish annual reports on its measures to strengthen the potential of non-governmental organisations as implementing partners and the results it achieved. It is not clear whether these annual reports have been produced. See: <https://www.gov.pl/web/polskapomoc/konsultacje-spoleczne-programu-wspolpracy-z-organizacjami-pozarzadowymi> (in Polish).

⁵⁰ To access the eGranty tool, see: <https://egranty.msz.gov.pl/home>. For more information see: <https://www.gov.pl/web/polskapomoc/zachecamy-do-rejestracji-ngos-w-nowej-aplikacji-konkursowej-msz--egranty> (both only available in Polish).

⁵¹ For example, Iceland developed framework agreements with four key CSOs to support a shift towards more stable partnerships and co-operation. A [2021 evaluation of Iceland’s CSOs strategy](#) and the 2017 DAC Peer Review of Iceland’s Development Co-operation both recommended establishing framework agreements to strengthen the partnership between the MFA and CSOs. Iceland’s 2022 CSO co-operation strategy reflects this and underlines the importance of good and transparent partnerships with capable and active CSOs, clear and accessible rules on grants and procedures, and focuses on accountability and monitoring. The approach included the requirement for interested CSOs to undertake an audit and due diligence study; it included targeted recommendations for all participating CSOs to improve institutional and financial management, as well as training for CSOs on internal controls. Due to the relatively small size of Icelandic CSOs, capacity building was a valuable dimension of the approach. For more information, see: <https://www.oecd.org/development-cooperation-learning/practices/iceland-s-strategic-partnerships-strengthen-civil-society-capacity-94c9ef42> and OECD (2023_[64]). New Zealand has also recently strengthened its approach to partnering with CSOs, co-designing a new approach in collaboration and dialogue with New Zealand CSOs. For more information, see: <https://www.oecd.org/development-cooperation-learning/practices/partnering-for-impact-how-new-zealand-co-designed-new-civil-society-funding-mechanisms-b776a631> and OECD (2023_[66]). These changes were also supported by an independent evaluation of New Zealand’s exiting approach in 2018.

⁵² Poland’s self-assessment explains that COVID-19 and the war in Ukraine have slowed down progress of this tool, which has been in the making since 2018.

⁵³ Engaging in the OECD Development Communication Network (DevCom) would provide an avenue to learn from other DAC members’ experience with public engagement and development awareness, including setting objectives, framing messages, and identifying relevant channels and partnerships. For more information see: <https://www.oecd.org/dev/pgd/devcom.htm>.

⁵⁴ The 2011 act states that “educational activities shall also be undertaken in order to increase awareness and understanding for global problems and interdependence between countries.” (Government of Poland, 2011_[8]).



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