Foreword

The OECD Development Assistance Committee (DAC) conducts reviews of the development co-operation efforts of DAC members every five to six years. DAC peer reviews seek to improve the quality and effectiveness of development co-operation policies, programmes and systems, and to promote good development partnerships for greater impact on poverty reduction and sustainable development in developing countries.

From 2021, DAC peer reviews no longer cover all components identified in the peer review analytical framework (www.oecd.org/dac/peer-reviews/about-peer-reviews.htm). Instead, they highlight good and innovative practices and reflect on key challenges faced by the reviewed member on select themes, recommending improvements. These themes are selected through consultation with representatives from the reviewed member and its partners.

At the beginning of the process, the reviewed member submits a self-assessment. Based on this, staff from the Secretariat and two DAC members designated as peer reviewers visit the member’s capital to interview officials and parliamentarians, as well as representatives of civil society, non-government organisations and the private sector. This is followed by visits to up to two partner countries or territories, where the team meets with the representatives from the reviewed member as well as senior officials and representatives of the partner’s administration, parliamentarians, civil society, the private sector and other development partners. The team then compiles the findings of these consultations and prepares a set of recommendations which are then discussed during a formal meeting of the DAC prior to finalisation of the report. During the whole process, the OECD Development Co-operation Directorate provides analytical support and is responsible for developing and maintaining, in close consultation with the DAC, the methodology and analytical framework within which the peer reviews are undertaken.

To support learning between DAC members, the report highlights a number of valuable practices from the reviewed member, from which peers can draw inspiration and learning. These are documented in further detail on the Development Co-operation TIPS · Tools Insights Practices online peer learning platform (www.oecd.org/development-cooperation-learning), that offers insights into making policies, systems and partnerships more effective. The peer review report is complemented by Poland’s Development Co-operation Profile (https://doi.org/10.1787/2dcf1367-en) which includes factual information on its policies, development financing, institutional arrangements, and management systems.

The analysis presented in this report is based on (1) a desk review, including Poland’s self-assessment and written assessments provided by more than 19 partners (multilateral, non-government and academic partners as well as partner governments); and (2) an extensive process of consultation with actors and stakeholders in Poland and Moldova (listed in Annex B). The report, which contains both findings and recommendations, was discussed during the DAC meeting at the OECD on 8 November 2023, at which senior officials from Poland responded to questions and comments shared by DAC members.
Development Assistance Committee (DAC) peer reviews function as a tool for both learning and accountability. This report is the result of an in-depth consultation and review process. It was produced by a review team comprising peer reviewers from New Zealand (Cameron Cowan, Ministry of Foreign Affairs and Trade, and Rosie Zwart, Ministry of Foreign Affairs and Trade) and Sweden (Erik Jonsson, Ministry for Foreign Affairs, and Nina Geladze Ekstedt, Swedish International Development Cooperation Agency). From the OECD Development Co-operation Directorate, Anita King, Policy Analyst, served as the lead analyst for the review, together with Gregory De Paepe, Policy Analyst. Renwick Irvine, Team Lead Peer Reviews, oversaw the review. Samantha Proteau provided logistical assistance to the review, and formatted and produced the report. The report was prepared under the supervision of Rahul Malhotra, Head of Division, Reviews, Results, Evaluation and Development Innovation. The report was edited by Jennifer Allain.

The team are grateful for valuable inputs from across the Development Co-operation Directorate and the OECD, including the Directorate for Financial and Enterprise Affairs; the Directorate for Legal Affairs; the Directorate for Public Governance; the Global Relations and Co-operation Directorate; and the Development Centre. Written submissions from a selection of Poland’s key partners helped to focus and enrich the review.

The Peer Review of Poland benefited throughout the process from the facilitation of representatives of Poland’s Ministry of Foreign Affairs. The review team also thanks the Embassy of Poland to the Republic of Moldova who ensured smooth contact with local counterparts.
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This book has...

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Abbreviations and acronyms

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>BGK</td>
<td>Bank Gospodarstwa Krajowego</td>
</tr>
<tr>
<td>CRS</td>
<td>Creditor Reporting System</td>
</tr>
<tr>
<td>CSO</td>
<td>Civil society organisation</td>
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<td>DAC</td>
<td>Development Assistance Committee</td>
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<td>DDC</td>
<td>Department of Development Cooperation</td>
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<tr>
<td>EU</td>
<td>European Union</td>
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<tr>
<td>GDP</td>
<td>Gross domestic product</td>
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<tr>
<td>GNI</td>
<td>Gross national income</td>
</tr>
<tr>
<td>ICRC</td>
<td>International Committee of the Red Cross</td>
</tr>
<tr>
<td>MFA</td>
<td>Ministry of Foreign Affairs</td>
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<tr>
<td>ODA</td>
<td>Official development assistance</td>
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<tr>
<td>OECD</td>
<td>Organisation for Economic Co-operation and Development</td>
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<tr>
<td>PiS</td>
<td>Prawo i Sprawiedliwość (Law and Justice)</td>
</tr>
<tr>
<td>SDG</td>
<td>Sustainable Development Goal</td>
</tr>
<tr>
<td>SEAH</td>
<td>Sexual exploitation, abuse and harassment</td>
</tr>
<tr>
<td>TAIEX</td>
<td>Technical Assistance and Information Exchange</td>
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<tr>
<td>UN</td>
<td>United Nations</td>
</tr>
<tr>
<td>UNFCCC</td>
<td>United Nations Framework Convention on Climate Change</td>
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<td>USAID</td>
<td>United States Agency for International Development</td>
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Currency codes:

<table>
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<td>Euro</td>
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<tr>
<td>PLN</td>
<td>Polish złoty</td>
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<tr>
<td>USD</td>
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Slight discrepancies in totals are due to rounding.

Annual average exchange rate: 1 USD = PLN; 1 USD = EUR

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<td>0.893</td>
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<td>0.845</td>
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Executive summary

This report assesses progress made since Poland’s first OECD DAC peer review in 2017, highlighting successes and challenges and providing recommendations for the future. It was prepared with reviewers from New Zealand and Sweden with support from the OECD Secretariat.

Poland’s legal and policy framework establish a clear ambition for its development and humanitarian assistance. Poland’s 2021-2030 multiannual programme is aligned with the 2030 Agenda and was adopted at a whole-of-government level by the Council of Ministers. While in principle it is owned across government, in practice, political support for development co-operation is a challenge and has presented a difficult context for Poland to deliver on its reform ambitions since 2017.

Poland’s official development assistance (ODA) has not kept pace with its strong economic trajectory and continues to comprise a large share of in-donor costs, as well as loans that are tied to Polish businesses. Total ODA increased from 0.13% to 0.15% of GNI over 2017 to 2021. In responding to urgent needs, Poland mobilised additional funding in 2022 with ODA exceptionally increasing to 0.51% of GNI. Maintaining this momentum to meet Poland’s commitment to allocate 0.33% of GNI as ODA by 2030 will require a sustained effort and a clear road map. In doing so, increasing the share of ODA that is delivered to partner countries and that is untied will be important, as recommended in 2017.

Poland’s impressive whole-of-society response to the impacts of Russia’s war of aggression in Ukraine demonstrated flexibility and an ability to mobilise different actors in times of need. A range of government ministries and actors were mobilised in Poland’s response including the Polish development bank, BGK. A wider range of actors are also increasingly engaging in the delivery of Polish ODA. Poland’s Solidarity Fund has been adaptive in responding to recent crises, growing substantially in the past three years in both budget and personnel, primarily through increased funding from external partners and different parts of the Polish government.

Making the most of this flexibility while equipping the MFA with the mandate and ability to steer an evolving development co-operation system is now an important challenge. The MFA’s Department of Development Cooperation (DDC) remains responsible for steering Polish development co-operation, but its mandate and capacity to do so need reaffirming. Empowering DDC with the necessary capabilities to build effective working relationships, supported by clear roles and responsibilities and backed up by political leadership, will be an important first step.

Making more effective use of the Development Co-operation Policy Council would strengthen policy formulation, co-ordination and strategic oversight. Political debate on development co-operation in Poland is limited and there is scope for the Policy Council to play a much greater role in providing advice, supporting co-ordination and in driving demand for results and oversight. Enhancing transparency and allocating time to discuss results, practice and policy would strengthen the Council’s ability to provide solid recommendations to the government. Including all key actors in the Council would ensure the Council can drive co-ordination, engage in productive discussions on challenges and opportunities for Polish co-operation, and support more strategic direction across the government.

Greater co-ordination across ministries would also increase coherence between policy goals. Poland’s policy documents commit to policy coherence for development and identify a set of priority areas.
Publishing line ministry reporting on policy coherence priorities and subsequent discussions would help to track progress and enable more informed public debate to help Poland work through difficult issues. Ensuring that Poland’s international policy stances do not impede agreements of strategic importance for sustainable development and developing countries would also ensure greater coherence across government and with Poland’s development co-operation efforts.

As pointed out in 2017, the ongoing reliance on annual projects to programme bilateral ODA is administratively burdensome and limits Poland’s ability to plan strategically in line with partner country priorities. The late announcement of calls for proposals and slow decision making have led to late disbursement of funds by the MFA in recent years. The range of very small projects managed under different instruments also risks duplication and incoherence. This fragmentation and annual programming is hampering Poland’s ability to co-ordinate with others in partner countries and to deliver on commitments to partner country ownership. Prioritising a more strategic, sustainable approach to programming bilateral ODA based on multi-year planning and budgeting, with fewer, but bigger projects will be important.

Clearer, whole-of-government objectives in each partner country would better guide programming. Increasing the geographic and thematic focus of ODA allocations, as recommended in Poland’s last peer review, would enhance quality and impact. Poland should also be careful not to dilute its added value by increasing the number of thematic priorities. Using consultations with partner governments as the starting point for formulating rolling country plans that capture all of Poland’s engagement in a country and align with Poland’s comparative advantage will be an important next step. Having an established system of performance monitoring, evaluation and reporting is a key criterion for DAC membership and critical for effective bilateral co-operation.

Investing in improved project management capabilities would enhance quality and effectiveness. This should focus on strengthening the MFA’s systems to manage for risk and mainstream gender equality and climate and environment. Building on learning from other DAC members, greater collaboration across Polish actors would also ensure that future efforts to strengthen the Solidarity Fund’s systems driven by its EU pillar assessment can contribute to improved practice and knowledge across all Polish Aid.

Human resources are a significant bottleneck and need investing in as a priority. Human resource constraints are particularly acute in DDC, affecting its ability to deliver on much-needed reforms and bringing real risks for the quality of Poland’s co-operation. Focusing on how the MFA can become more attractive to retain skilled and qualified staff, investing in training, buying in additional skills where needed and strengthening development capabilities in embassies would support more effective partnerships.

The European Union remains Poland’s primary multilateral channel, but more can be done to prioritise development in its political engagement. Poland’s 2025 Presidency of the Council of the European Union comes at a strategic moment, and Poland has an important opportunity to build on the response to Russia’s war in Ukraine to raise awareness and show leadership. Stepping up co-ordination with other EU Member States in partner countries would also better enable Poland to leverage its presence and added value.

Fully harnessing the strengths of civil society organisations (CSOs) requires a longer-term approach to funding and partnering. While Poland’s policies recognise the key role that civil society plays in Polish Aid, partnerships are constrained by declining funding, predictability and trust. Moving towards core funding and a partnership model that does not rely on annual calls for proposals would be in line with good practice. More systematic and comprehensive dialogue would help to rebuild trust and support more effective working partnerships. There is also potential to better mobilise civil society to raise awareness of the relevance of development co-operation across Polish society and at a political level.

The Development Co-operation Profile of Poland provides additional information on Poland’s co-operation. Polish practices to inspire other DAC members and development actors are described on the learning platform, Development Co-operation TIPs - Tools Insights Practices.
The DAC’s recommendations to Poland

1. 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.

2. 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.

3. 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.

4. To maximise the contributions of all actors in the Polish development co-operation system, supported by more effective working level co-operation and communication:
   a. 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;
   b. all ministries should align their ODA activities to the commitments and priorities articulated in the multiannual programme and respond to the MFA’s direction;
   c. 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
   d. BGK should work with the MFA to bring a development lens to its growing engagement in partner countries.

5. 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.

6. 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.

7. To achieve greater efficiency and impact in its bilateral ODA and as recommended in 2017, Poland should take a more programmatic approach, including by:
   a. focusing its bilateral ODA budget on a narrow set of priority countries and themes and ensure that allocations match these priorities;
   b. 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
   c. significantly reducing the number of calls for proposals to enable more substantial and sustainable projects, including phasing out those managed in MFA headquarters.

8. To more effectively manage bilateral ODA, the MFA should:
   a. 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;
   b. reinstate an evaluation function; and
   c. 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.
9. 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.

10. 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:
   a. address barriers to providing core and longer-term funding to civil society organisations;
   b. undertake systematic and meaningful consultations with civil society; and
   c. together with civil society, establish a vision for civil society’s role in Polish development co-operation, including as actors in their own right.
Infographic 1. Highlights from the 2023 Development Co-operation Peer Review of Poland

**POLAND’S STRENGTHS...**

- **A long term strategy aligning Polish co-operation with the 2030 Agenda**
  
  The 2021-2030 multiannual programme provides a framework for Polish development assistance.

- **An impressive whole-of-society response to recent crises**
  
  War at Poland’s border has spurred thinking on more joined-up humanitarian, development and peace efforts.

- **A range of public institutions support partner country reforms**
  
  Polish institutions participate in EU Twinning and TAEX projects on public finance, banking, and agriculture.

**...AND AREAS FOR IMPROVEMENT**

- **Strengthen the institutional set-up to reflect an evolving system and invest in development capability**

- **Meet international ODA commitments and link bilateral programming to clear strategic goals**

- **Invest in results and evaluation backed by stronger leadership and resources**

- **Reinvigorate partnerships with civil society through predictable core funding and transparent procedures**

**PROGRESS SINCE THE PREVIOUS PEER REVIEW**

Poland partially implemented 8 of the 15 recommendations made in its first review in 2017. The remaining 7 recommendations were not implemented.

- **P ARTIALLY IMPLEMENTED**
- **N OT IMPLEMENTED**
Infographic 2. Poland’s development co-operation at a glance

1. Poland’s development co-operation at a glance

   **IN 2022, POLAND SURPASSED ITS COMMITMENT TO PROVIDE 0.33% OF GROSS NATIONAL INCOME (GNI) AS ODA DUE TO SUPPORT TO UKRAINIAN REFUGEES**

   ![Graph showing ODA trends from 2016 to 2021.]

   **MOST POLISH ODA IS DELIVERED MULTILATERALLY**

   2021, Current prices

   ![Pie chart showing 70% multilateral, 30% bilateral.

2. Only 3 of Poland’s priority countries are among the top 10 recipients of ODA

   **ONLY 3 OF POLAND’S PRIORITY COUNTRIES ARE AMONG THE TOP 10 RECIPIENTS OF ODA**

   2020-21 average

   ![Pie chart showing distribution of ODA by priority countries.]

3. The EU is by far the most important recipient of Poland’s multilateral ODA

   **THE EU IS BY FAR THE MOST IMPORTANT RECIPIENT OF POLAND’S MULTILATERAL ODA**

   Gross disbursements in USD millions, 2021 constant prices

   ![Bar chart showing the EU as the largest recipient, followed by other multilateral institutions.]

4. The public sector is the main channel for implementing bilateral ODA

   **THE PUBLIC SECTOR IS THE MAIN CHANNEL FOR IMPLEMENTING BILATERAL ODA**

   2020-21 average, % of gross disbursements, 2021 constant

   ![Pie chart showing 53% public sector, 6% NGOs, 11% multilateral organisations, and 0% PPPs and private sector.]

5. Poland provided USD 41 million in ODA to fragile contexts in 2020-21, mostly for development objectives

   **POLAND PROVIDED USD 41 MILLION IN ODA TO FRAGILE CONTEXTS IN 2020-21, MOSTLY FOR DEVELOPMENT OBJECTIVES**

   2021 constant

   ![Pie chart showing 77% development, 12% peace, and 11% humanitarian assistance.]

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OECD DEVELOPMENT CO-OPERATION PEER REVIEWS: POLAND 2023 © OECD 2023
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]). 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

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[1]). 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[14]). 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). 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**

![Department of Development Cooperation's organisational structure diagram](image)

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. 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 in 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. 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. 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. 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]). This includes greater engagement with the European Union, including with EU guarantee instruments, following BGK’s pillar assessment in 2020. The clear division of labour on private sector development 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 (JEFCIC). 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]). 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]).

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, 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 attached 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[10]). 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

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OECD DEVELOPMENT CO-OPERATION PEER REVIEWS: POLAND 2023 © OECD 2023
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”). 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). 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.
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. \(^3\) 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. 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\(^{[25]}\)).\(^3\) 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\(^{[1]}\)).\(^3\) 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 Vietnam, 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, 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.

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).


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.\(^{36}\) 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]).
Reliance on annual calls for proposals also limits Poland’s ability to invest strategically and fulfill 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. 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.

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[1]). 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,
hinder both transparency and accountability on the results Poland is achieving (Government of Poland, 2023[34]).

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]). 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). 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; EU, 2020). 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).

**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; EU, 2020). 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).

**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) 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. 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 coordinates 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). 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 voïvodes (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.

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). 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.
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. 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[41]). 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:
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

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). 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.
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 sensitize 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.\(^5^3\)

**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]).\(^5^4\) 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**

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**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.

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.

References


MFA (2023), *Zał. Wytyczne dotyczące informowania o projektach 2023 (Guidelines for information about projects and marking projects 2023)*.

MFA (2022), *2023 Development Cooperation Plan*, Government of Poland, Warsaw, [https://www.gov.pl/attachment/5451a61b-1aae-4fc1-9a07-0c563db634a1](https://www.gov.pl/attachment/5451a61b-1aae-4fc1-9a07-0c563db634a1).


[...references mentioned in the document...]

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Notes


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](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[1]).

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\[1\]).


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.


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/pl/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.


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[83]). 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.
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.

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]).

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]).

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.

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.

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.

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]).
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.

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.

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.

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.

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.

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]).

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]).

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

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]).

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]).

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]).

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-społeczne-programu-współpracy-z-organizacjami-pozarządowymi (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-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]).
Annex A. Progress since the 2017 DAC peer review recommendations

Towards a comprehensive Polish development effort

<table>
<thead>
<tr>
<th>2017 Peer Review Recommendations</th>
<th>Progress</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1.1</strong> As it develops its approach to implementing Agenda 2030 Poland should integrate development co-operation and its other international commitments on sustainable development.</td>
<td>Partially implemented</td>
</tr>
<tr>
<td></td>
<td>Poland’s most recent Multiannual Programme was consulted across government and appears to be a key reference document for other ministries. There is, however, room to improve implementation (i.e. the extent to which the plan actually guides different official development assistance [ODA] allocations). General understanding of and support for development co-operation across the government remains low.</td>
</tr>
</tbody>
</table>

| **1.2** To deliver policies that are coherent with the aspirations of developing countries, Poland should: | Not implemented |
| | • clarify institutional roles, responsibilities and mechanisms for making its policies coherent with development objectives; and |
| | • ensure that government departments have resources and capacity to conduct regulatory impact assessments. |
| | Poland has not yet developed mechanisms to systematically identify and address potential transboundary impacts of domestic policies. While regulatory impact assessments continue to be used, they do not yet consider transboundary issues. Co-ordination across government remains challenging and the different roles and mandates for following up on policy coherence for sustainable development remain unclear. |

Vision and policies for development co-operation

<table>
<thead>
<tr>
<th>2017 Peer Review Recommendations</th>
<th>Progress</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2.1</strong> To strengthen its strategic framework, Poland should:</td>
<td>Partially implemented</td>
</tr>
<tr>
<td></td>
<td>• have a policy for providing loans and scholarships that aligns with principles for aid effectiveness, the objectives of the Development Cooperation Act, multiannual programmes and Agenda 2030.</td>
</tr>
<tr>
<td></td>
<td>• provide clear objectives and guidance for delivering on priorities such as reducing poverty and cross-cutting issues such as gender equality and environmental protection.</td>
</tr>
<tr>
<td></td>
<td>• define a strategic approach to meeting the needs of different partner countries in a way that adds value and complements support provided by other development partners.</td>
</tr>
<tr>
<td></td>
<td>Poland committed to no longer providing tied loans to least developed countries and adopted a policy in 2019 linking loans to thematic and geographic priorities. Further progress on untying aid is needed. Poland has improved the co-ordination of its various scholarship programmes, including through the creation of a new agency in 2017, NAWA. The 2021-2030 Multiannual Programme provides some additional details for staff on Poland’s cross-cutting issues, and reducing inequality is a priority. There is no new guidance to support staff on linking development co-operation allocations to reducing poverty. Planned guidance on cross-cutting issues is stalled, in part due to resource constraints. There is no clear guidance for staff to ensure allocations support a systematic, country-driven response. Interventions remain fragmented, are not country led and co-ordination with other donors at country level could be improved.</td>
</tr>
</tbody>
</table>
Aid volume and allocation

<table>
<thead>
<tr>
<th>2017 Peer Review Recommendations</th>
<th>Progress</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1 As it increases ODA to meet its commitments Poland should allocate more resources to the bilateral budget.</td>
<td>Partially implemented</td>
</tr>
<tr>
<td>Poland’s bilateral ODA fell in volume between 2017 and 2020. It increased in 2021 and 2022 due to COVID-related support (donation of vaccines) and in-donor refugee costs. There is currently no plan in place to increase Poland’s programmable bilateral ODA in 2023 or beyond.</td>
<td></td>
</tr>
<tr>
<td>3.2 Poland should focus its bilateral aid, including loans and scholarships, on priority countries and themes.</td>
<td>Partially implemented</td>
</tr>
<tr>
<td>The Multiannual Programme usefully retains a limit of ten priority partner countries. The share of ODA going to Poland’s top 10 recipients increased between 2017 and 2021. However, seven out of the 10 are not priority partner countries. Poland’s thematic priorities are increasingly broadly defined.</td>
<td></td>
</tr>
<tr>
<td>3.3 Poland should allocate its multilateral contributions in a strategic, whole-of-government way to support implementation of its development co-operation priorities.</td>
<td>Partially implemented</td>
</tr>
<tr>
<td>There is good co-ordination between the Ministry of Foreign Affairs (MFA), the Ministry of Finance and the Central Bank on contributions to international finance institutions. Poland consistently allocates funding to a set of United Nations partners; however, the number of organisations receiving funding is increasing while overall volumes are decreasing, causing fragmentation. Multilateral ODA is planned on an annual basis, limiting strategic planning.</td>
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Organisation and management

<table>
<thead>
<tr>
<th>2017 Peer Review Recommendations</th>
<th>Progress</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1 To strengthen and make more efficient its business model and free up staff time for other strategic activities, the Ministry of Foreign Affairs should rationalise the overall number of channels for the special budget reserve and streamline calls for proposals.</td>
<td>Partially implemented</td>
</tr>
<tr>
<td>The Department of Development Cooperation’s (DDC) business model remains instrument-based, with significant staff time spent on project administration. The DDC must still administer many individual calls for proposals. The reallocation of a share of the special budget reserve to the MFA budget since 2021 has the potential to improve flexibility and streamline decision making.</td>
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</tr>
<tr>
<td>4.2 Poland should make greater effort to bring different parts of the aid system together and draw on technical capacity throughout the system.</td>
<td>Not implemented</td>
</tr>
<tr>
<td>The Policy Council is seen as the main mechanism through which to co-ordinate different actors in the system. It remains underutilised. There is significant scope for Poland to better leverage capability and expertise outside the MFA, including in think tanks and civil society, as well as the Solidarity Fund.</td>
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Development co-operation delivery and partnerships

<table>
<thead>
<tr>
<th>2017 Peer Review Recommendations</th>
<th>Progress</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.1 Poland’s objective to increase aid transparency, predictability, ownership and focus should shape its aid modalities and partnerships.</td>
<td>Partially implemented</td>
</tr>
<tr>
<td>The continued reliance on small projects, managed through calls for proposals, is limiting the scope for predictability, ownership and focus. The use of modular projects has somewhat improved predictability for civil society organisations, but this remains limited. The annual budget restricts Poland from developing a forward expenditure plan. Planned reforms to improve transparency have been delayed.</td>
<td></td>
</tr>
<tr>
<td>5.2 The Ministry of Foreign Affairs should communicate its vision, strategy and criteria for reforming its aid modalities to help implementing partners, such as NGOs, to work in a different way.</td>
<td>Not implemented</td>
</tr>
<tr>
<td>There has been no systematic consultation or discussion on how to move away from an annual, contract-based approach to partnering. The context for partnering with Polish civil society organisations has become more challenging, with less dialogue.</td>
<td></td>
</tr>
<tr>
<td>5.3 Poland should bring its ODA in line with the Revised DAC Recommendation on Untying ODA to the Least Developed Countries and Heavily Indebted Poor Countries (2014) and the DAC Recommendation on Terms and Conditions of Aid (1978).</td>
<td>Partially implemented</td>
</tr>
<tr>
<td>Poland is reducing the amount of ODA tied under the Recommendation, although it has not yet fully met the Recommendation. Poland has improved its performance against the Recommendation on terms and conditions, meeting the norm for the special terms for all least developed countries for first time in 2021 (98.7%).</td>
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### Results and accountability

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<thead>
<tr>
<th>2017 Peer Review Recommendations</th>
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</thead>
<tbody>
<tr>
<td><strong>6.1</strong> Poland should build a culture of working towards results and develop an approach to managing for results throughout the portfolio.</td>
<td>Not implemented</td>
</tr>
<tr>
<td>Planned development of a results-based management system was paused due to staffing resource constraints. There remains a general lack of understanding and support for results across the MFA and very limited accountability requirements to parliament. The MFA’s annual reports on development co-operation were last published in 2019.</td>
<td></td>
</tr>
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</table>

| **6.2** Building on progress with evaluation so far, Poland should guarantee the independence of evaluation from policy and programming and broaden its scope to all aid channels. | Not implemented |
| Prior to 2020, evaluations and research were commissioned through public procurement processes. After 2020, Poland abolished the evaluation function in DDC due to limited staff resources. No evaluations have been published since 2020. It is unclear whether management responses were developed in the past. |

### Humanitarian assistance

<table>
<thead>
<tr>
<th>2017 Peer Review Recommendations</th>
<th>Progress</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>7.1</strong> Poland should avoid spreading its humanitarian aid too thinly by focusing on a few priorities where it can play a valuable role during a humanitarian and crisis response.</td>
<td>Not implemented</td>
</tr>
<tr>
<td>Poland has maintained the following geographical and horizontal priorities of its humanitarian aid: the crisis in the Syrian Arab Republic and the neighbouring countries; Eastern Ukraine (until 2021); Ukraine since February 2022; the protection of civilians, including persons with disabilities. The Development Cooperation Act was amended in 2020 to allow Poland’s Solidarity Fund to provide humanitarian aid to other countries.</td>
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</table>

| **7.2** Poland should explore ways of forming strategic partnerships with Polish NGOs, for example to enable a timely response. | Not implemented |
| In 2018, Poland signed a memorandum of understanding with the International Committee of the Red Cross. Beyond this, however, Poland has not made progress in terms of forming more strategic partnerships with development or humanitarian non-governmental organisations. |
Annex B. Progress against OECD legal instruments under the responsibility of the DAC

Recommendations adopted by the Development Assistance Committee

Recommendation on the Terms and Conditions of Aid (1978) [OECD/LEGAL/5006]

The average grant element of Polish ODA commitments was 99.1% in 2020 and 99.0% in 2021. This exceeds the norm of 86%, and therefore meets the requirements of Paragraph 2 of the Recommendation on the Terms and Conditions of Aid. Poland’s preliminary ODA as a share of GNI also surpassed the DAC average country effort of 0.38% for the first time in 2022 (preliminary figures). This meets the requirements of Paragraph 3 of the Recommendation.

In 2021, Poland also met for the first time the commitment on the special terms for least developed countries (LDCs) (Paragraph 8), exceeding the 90% norm. The grant element of bilateral ODA commitments to LDCs reached 98.71% in 2021, compared to 86.89% in 2020. If this trend persists for 2022 and beyond, Poland will be on track to meet the alternative norm of maintaining a three-year average of grant element of bilateral ODA to LDCs beyond 86%.

Recommendation on Untying Official Development Assistance (2001) [OECD/LEGAL/5015]

Poland is not yet aligning with the DAC Recommendation on Untying Official Development Assistance. The share of de jure untied ODA provided to countries covered by the Recommendation stood at just 7.5% in 2021, compared to 24% in 2020 (OECD, 2022[1]).

Poland awarded more than 80% of contracts (in terms of value) to domestic entities, largely domestic CSOs.

Regarding adherence to the transparency provision of the Recommendation, Poland consistently reports to the DAC Secretariat on its ex post contract awards. Poland usually does not have any contracts above the Special Drawing Rights 700 000 ex ante notification threshold.


Poland is transitioning to a modernised crisis response system that would more systematically adopt the Humanitarian, Development and Peace (HDP) Nexus approach. Poland has two very distinct responses to crises and crisis risks. In Poland’s neighbourhood, the HDP nexus approach is well articulated because Poland’s development co-operation has a clear political objective of supporting democracy and preventing crisis. In this geography, peace is the objective to which development co-operation is mobilised, historically through the Solidarity Fund. This is a rare case of a DAC member adopting an HDP nexus approach by design.
In other geographical areas, peace, development and humanitarian assistance are more disjointed. The aggregation of separate projects across humanitarian, development or peace sectors does not reflect an intentionally designed HDP nexus approach, in which each individual engagement is relevant. In Lebanon, for example, there is no strategic link between Poland’s participation in the United Nations Interim Force in Lebanon (UNIFIL) with 192 troops (UN, 2023[2]) and its different infrastructure or humanitarian operations in other parts of the country.

The DAC Recommendation is built on the premises of prevention always, development wherever possible and humanitarian assistance only when necessary. Most of Poland’s priority or additional countries are fragile but not in conflict. Several of them face particular governance issues or crises. Poland can build on its expertise in democratisation, governance and crisis prevention to support both government and civil societies, ensuring that society is an integral part of all structural change and reforms.

Beyond its strategic aspect, building an HDP nexus response to crises and crisis risks entails operational and financial flexibility. Supporting local civil society requires significant decision-making power at embassy level. In addition, Poland’s funding processes continue to be constrained. The calls for proposal modality and annual programming prevent Poland from building the long-term partnerships that are required to reach long-term development and support governance objectives.

Thanks to Poland’s experience in mobilising its ODA toward a clear political objective, there is scope for building a more comprehensive system to respond to crises risks and autocratisation.

**DAC Recommendation on Ending Sexual Exploitation, Abuse and Harassment in Development Co-operation and Humanitarian Assistance (2019)** [OECD/LEGAL/5020]

Regarding the development of policies and professional conduct standards (Pillar 1), Poland’s Solidarity Fund has developed a code of conduct to prevent discrimination and harassment (Solidarity Fund, 2021[3]). The MFA has not yet developed a similar code of conduct.

Poland has classified sexual exploitation and abuse and sexual harassment as crimes under Polish labour laws, applicable to those working in government. Poland could develop specific guidelines on how this applies in a development and humanitarian assistance context, including when working with external partners.

Regarding the development of a victim/survivor-centred response (Pillar 2), Poland states that it has taken initial steps towards adopting a more victim/survivor-centred approach, but how these efforts apply in practice remains unclear. Poland needs to accelerate progress on specific measures, including dedicated services and co-ordinated support to sexual exploitation, abuse and harassment victim/survivors, and addressing the underlying causes of violence. Integrating SEAH in regular staff training and risk assessments to underpin a stronger environment of prevention would support implementation of the Recommendation.

Regarding training and awareness raising (Pillar 4), Poland has translated the DAC Recommendation into Polish. However, this is awaiting approval for publication on the MFA’s website and is therefore not yet public (MFA, 2023[4]). Poland has taken steps to disseminate the DAC Recommendation with civil society partners and local authorities, which is to be further encouraged.

Regarding international co-ordination for preventing SEAH (Pillar 5), Poland will need to continue collaborating with international stakeholders – including through the DAC Reference Group on Ending SEAH – to ensure progress against implementation of the DAC Recommendation. Poland has committed to co-operate closely with other DAC members on the Recommendation (MFA, 2023[5]). Clarifying Poland’s priorities for this engagement and communicating on these can help to deliver on this commitment.
Recommendation on Enabling Civil Society in Development Co-operation and Humanitarian Assistance (2021) [OECD/LEGAL/5021]

Regarding respecting, protecting and promoting civic space (Pillar 1), Poland aims to promote civic space in Eastern Partnership countries. In its four Eastern Partnership priority partner countries, Polish Aid is committed to “building civil society, including efforts to ensure flexible, inclusive, participatory and representative decision-making at all levels of government” (MFA, 2021[5]). To this end, Poland has translated the DAC Recommendation into Polish and published it online (Government of Poland, 2022[6]).

Poland also intends to engage in dialogue with partner country governments through the preparation of partner country strategies (MFA, 2023[4]). There is no evidence of co-ordination or exchange of information with other providers or international, regional or national bodies to monitor the evolution and state of civic space in partner countries. In Moldova, Polish Aid implemented through Polish CSOs is not systematically recorded in the partner government’s ODA management systems, complicating oversight and accountability.

Regarding supporting and engaging with civil society (Pillar 2), Poland considers CSOs to be key implementing partners of Polish Aid. Excluding funding to the Solidarity Fund, which Poland considers as a CSO in its ODA reporting to the OECD, the share of total bilateral ODA funding to and through CSOs averaged 7.9% over the period 2017-21 (OECD, 2023[7]). This contrasts with the OECD-DAC average of 14.7% over the same period. To date, Poland does not provide core support to CSOs. As there are legal and regulatory constraints for Poland to provide financial support to non-Polish CSOs within partner countries Polish CSOs are required to partner with local institutions and organisations as a means to strengthen civil society in partner countries.

In line with the DAC Recommendation (Pillar 2, Provisions 3 and 4.a and Pillar 3, Provisions 3 and 4), Poland is encouraged to provide financial support to more diverse civil society actors, including those in partner countries; increase the availability of direct, flexible and predictable support, including core support and/or programme-based support to CSOs; work with CSOs to implement mutual capacity building to address CSOs’ vulnerabilities; and support more equitable partnerships between provider country and/or international CSOs and partner country CSOs they work with.

Recommendations adopted by the OECD Council

OECD Recommendation on Policy Coherence for Sustainable Development (2019) [OECD/LEGAL/0381]

Poland’s policy documents commit to policy coherence for sustainable development at the national government level. The MFA is mandated to co-ordinate government activities to consider the possible spill over or transboundary effects of policies and regulations on other countries, including developing countries, while the Ministry of Economic Development and Technology is responsible for the national implementation of the SDGs (Government of Poland, 2021[8]).

Poland has identified five priority policy coherence issues and has listed them in its development co-operation policy documents. As of 2023, they are: illicit financial flows in the areas of fighting tax evasion and money laundering; combatting illegal trade in endangered plant and animal species; implementation of corporate social responsibility standards; sustainable cities and communities; and climate, including the natural environment and the seas.

Activities in these priority areas should be implemented by the relevant line ministry as a lead institution, in co-operation with the MFA and in consultation with other ministries. Priority issues are set out in Poland’s multiannual programme and updated from time to time in annual plans. Co-ordination between line ministries and the MFA on these issues appears to be on an ad hoc basis. The government is expected to
present progress on each priority area to the Policy Council on an annual basis (Government of Poland, 2021[8]). As Policy Council discussions and the progress reports are not made public, it is unclear whether this does indeed take place and the extent to which this helps Poland resolve policy trade-offs in practice. Institutional responsibilities for following up on priorities need to be clarified.

Regulatory impact assessments are required for all laws and regulations, enabling the Ministry of Economy and Development to monitor the implementation of the SDGs and look at the impact of regulations beyond individual ministerial silos. They do not yet consider the transboundary impacts of Polish laws and regulations on other countries’ development aspirations despite a commitment during the last peer review to include this.

OECD Recommendation for Development Co-operation Actors on Managing the Risk of Corruption (2016) [OECD/LEGAL/0431]

Poland relies on mandatory anti-corruption e-learning courses as one of its main tools to manage corruption risks in its development and humanitarian assistance operations. These are linked to codes of conduct, guidance on asset declarations, and whistleblower and reporting mechanisms. There is scope to develop these further, in particular with regard to their application to and use by external partners. Further, it appears that the Polish development co-operation system recorded no reports of allegations of corruption or intentional misuse of resources in recent years. This near absence of corruption reports questions the efficiency of the corruption risk management system. Evidence from other donor countries highlights the fact that no reported allegations or incidents of corruption raises concerns on the effectiveness of detection and reporting mechanisms. Looking into the disincentives to report suspicions of corruption, with a view to better tackling them, could improve the risk management system.

The Recommendation calls for an active and systematic assessment and management of corruption risks. The extent and frequency with which Poland assesses corruption risks is unclear – as are risks that extend beyond the fiduciary dimension (e.g. conflicts of interest, nepotism, reputational risks, etc.). Enhanced and systematic coverage of these risks would likely help enhance the effectiveness and integrity of Polish ODA.

OECD Recommendation on Environmental Assessment of Development Assistance Projects and Programmes (2020) [OECD/LEGAL/0458]

Recent annual plans specify that all projects need to be preceded by an analysis of their compliance with cross-cutting priorities, including that a project does not harm the environment (MFA, 2022[9]; 2021[5]). Not all projects are analysed for their potential impact on climate and the environment. Guidelines associated with the 2023 call for proposals include some additional guidance for partners on how Poland expects climate and the environment to be considered in project design. The degree to which these support more effective mainstreaming remains to be seen, and monitoring reports suggest limited understanding by staff and partners of how to integrate climate and environment considerations into project design. Another barrier appears to be the lack of general consent that cross-cutting priorities need reinforced as well as a lack of specific expertise within the MFA. Poland could make greater use of the DAC Secretariat and the statistical peer review mechanisms to improve the screening and use of the Rio Markers.

With respect to investments of commercial clients financed by BGK, a requirement has been implemented to screen and verify the potential impact on the climate and environment, both from the perspective of the financed transaction itself and the existing business activity of the business partner. The verification procedure takes place as part of the broadly understood ESG risk management system. At a national level, Poland has set goals for improving efforts to protect the environment and tackle climate change and has undertaken carbon neutrality commitments under the United Nations Framework Convention on Climate Change (UNFCCC). However, the rule of climate neutrality for projects has not yet been adopted as a
binding principle for Polish Aid. Climate, including the environment and the seas, is among Poland’s priority policy coherence for development issues (as of 2023).

**OECD-DAC Declarations**

*DAC Declaration on a new approach to align development co-operation with the goals of the Paris Agreement on Climate Change (2021)* [OECD/LEGAL/0466]

Polish Aid recognises climate as a priority aspect of development in line with international agreements, including the Paris Agreement on Climate Change and the Convention on Biological Diversity. According to the 2021-2030 Multiannual Programme, climate is both a cross-cutting and a priority area of Polish development assistance, with the current programme adding forests and biodiversity and renewable energy to Polish Aid’s priority themes. Climate is also one of Poland’s Policy Coherence for Development priority areas. Poland has undertaken carbon neutrality commitments under the UNFCCC but has not yet adopted the rule of climate neutrality for projects as a binding principle for Polish ODA (MFA, 2023[4]).

The current Multiannual Programme (2021-2030) commits Polish development co-operation to not harm the environment; perceive climate change as a risk to achieving the SGDs; strive to reduce greenhouse gas emissions relating to project activities; support the effective functioning of the economy and society in a changing climate; contribute to capacity building for using renewable energy sources as well as adapting to climate change and mitigating its effects; and promote sustainable management of natural resources, protection of biodiversity and ecosystems.

Measures to achieve Poland’s commitments are primarily carried out through the “Polish Development Assistance” annual calls for proposals. In practice, Poland’s ODA programming does not reflect the importance Poland places on climate both as a priority area and a cross-cutting topic. In 2020-21, Poland committed just 4.4% of its total bilateral allocable aid (USD 6.2 million) in support of the environment and the Rio Conventions (compared to the DAC average of 34.3%), down from 27.7% in 2018-19 (OECD, 2023[10]).

The MFA is working on developing tools to better integrate climate into Polish Aid projects. A series of questions for potential implementing partners has been added to project grant forms, encouraging partners to include climate considerations into project planning. Questions include whether a project includes environmental awareness building and/or communication as part of its activities, and whether the project aims to increase the capacity of local communities to adapt to the effects of climate change.

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MFA (2022), 2023 Development Cooperation Plan, Government of Poland, Warsaw, 
https://www.gov.pl/attachment/5451a61b-1aae-4fc1-9a07-0c563db634a1. [9]

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https://doi.org/10.1787/e3ce3d47-en. [10]

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Solidarity Fund (2021), Code of Conduct: To Prevent Discrimination and Harassment, Including 
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UN (2023), Troop and Police Contributors (database), https://peacekeeping.un.org/en/troop-and-
police-contributors. [2]

Notes

1 See: https://www.gov.pl/web/polskapomoc/rekomendacje-komitetu-pomocy-rozwojowej-oecd-w-
sprawie-wlaczenia-społeczeństwa-obywatelskiego-we-wspolprace-rozwojowa-i-pomoc-
humanitarna#:~:text=Rekomendacje%20Komitetu%20Pomocy%20Rozwojowej%20OECD%20w%20sprawie%20w%20spoleczenstwa-obywatelskiego-we-wspolprace-rozwojowa-i-pomoc-humanitarna.

https://za-granica.org.pl/rekomendacje-dac-ws-wlaczenia-
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Annex C. Organisations consulted during the peer review

Organisations consulted in Poland

Public authorities

1. Bank Gospodarstwa Krajowego (BGK)
2. Central Bank of Poland
3. Government Strategic Reserves Agency
4. Main School of Fire Service (SGSP)
5. Marshal’s Office of the Podkarpackie Voivodeship
6. Ministry of Climate and Environment
7. Ministry of Development Funds and Regional Policy
8. Ministry of Economic Development and Technology
9. Ministry of Education and Science
10. Ministry of Finance
11. Ministry of Foreign Affairs
12. Ministry of Health
13. Ministry of Interior and Administration
14. National Headquarters of the State Fire Service
15. National School of Public Administration (KSAP)
16. Polish National Agency for Academic Exchange (NAWA)

Civil society organisations and other actors

17. Caritas Poland
18. Centre for Eastern Studies
19. Foundation ADRA Poland
20. Fundacja Dobra Wola
21. Grupa Zagranica
22. Klub Inteligencji Katolickiej (KIK)
23. Order of Malta (Fundacja Pomoc Maltańska-Maltańska Służba Medyczna)
24. Polish Center for International Aid (PCPM)
25. Polish Humanitarian Action (PAH)
26. Polish Institute of International Affairs (PISM)
27. Stowarzyszenie Leczymy z Misją
Organisations consulted in Moldova

Moldovan authorities

30. Mayor of Cimișlia
31. Ministry of Energy
32. Ministry of Finance
33. Ministry of Infrastructure and Regional Development
34. Ministry of Internal Affairs
35. Regional Development Agency South

Polish authorities and other development co-operation providers in Moldova

36. Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH
37. EU Delegation
38. European Bank for Reconstruction and Development
39. European Investment Bank
40. Polish Embassy, Chisinau
41. Solidarity Fund PL in Moldova
42. United Nations Resident Co-ordinator
43. United States Agency for International Development (USAID)

Civil society organisations and other actors in Moldova

44. Congress of Ukrainians in the Republic of Moldova
45. iHelp Foundation
46. Local Action Group
47. Mostenitorii
48. National LEADER Network

Other organisations consulted for the review

49. Caritas Jerusalem
50. European Commission
51. Georgia Ministry of Regional Development and Infrastructure
52. Instytut Pracy i Edukacji
53. International Committee of the Red Cross (ICRC)
54. Office of Governor of Guria, Georgia
55. Southern Tanzania Elephant Program (STEP)
56. United Nations Development Programme, Istanbul Regional Hub
57. United Nations Office for the Coordination of Humanitarian Affairs (UN OCHA)
59. United Nations High Commissioner for Refugees (UNHCR)
60. Visegrad Fund
61. World Food Programme
OECD Development Co-operation Peer Reviews

POLAND

The OECD’s Development Assistance Committee (DAC) conducts peer reviews of individual members once every five to six years. Reviews seek to improve the quality and effectiveness of members’ development co-operation, highlighting good practices and recommending improvements. A DAC member since 2013, Poland has aligned its 2021-2030 Multiannual Programme with the 2030 Agenda, under the leadership of the Ministry of Foreign Affairs (MFA). Building on recommendations made in Poland’s first peer review in 2017, this review identifies opportunities for the Polish development co-operation system to work better together, programme bilateral official development assistance (ODA) more efficiently, and enhance multilateral and civil society partnerships. Recommendations include moving from annual calls for proposals to a more sustainable partnerships model, strengthening the MFA’s capabilities to co-ordinate with other actors in partner countries and better aligning Poland’s international engagement with its commitments to sustainable development.