Investing in fragile contexts: What Global Gateway for the Great Lakes region?

Policy Brief



EurAc

Europe-Central Africa Network

About EurAc

The Europe-Central Africa network (EurAc) was created in 2003 and brings together 29 members active in Central Africa, with a particular focus on the Great Lakes region. EurAc advocates for a strong, coherent and sustainable commitment from the European Union (EU) and its Member States to help the region build a better future.

As a network, collaborating with both European and African civil society actors, EurAc offers a common platform for exchange between civil society organisations (CSOs) and the institutions of the EU, thus creating a coordinated and holistic approach to addressing the challenges of the region, as well as proposing solutions adapted to the needs and realities on the ground.

Executive summary

Launched in late 2021, the Global Gateway initiative has, within a few years, established itself as a central component of the European Union's (EU) external action – a trend set to accelerate in the context of negotiations on the next multiannual financial framework (2028–2034). This trend raises a key question: **how can we ensure that the EU's strategic investments effectively contribute to the Sustainable Development Goals, to peace and to improving people's living conditions, particularly in fragile contexts such as the Great Lakes region?**

Owing to its reserves of critical minerals, the region has become a strategic area for the Global Gateway, as evidenced by the Lobito Corridor, the Kivu-Kinshasa Green Corridor and the memoranda of understanding signed by the EU with the Democratic Republic of the Congo (DRC) and subsequently with Rwanda. Nevertheless, in these countries, projects associated with the Global Gateway are taking place in environments characterised by persistent conflict, institutional weaknesses, governance deficits and a restricted civic space. Under these circumstances, investments in infrastructure, transport and natural resources cannot be assessed solely on the basis of their economic impact or their contribution to European strategic interests. Their relevance also depends on their ability to address local priorities, mitigate the risks of conflict and deliver tangible and sustainable benefits for local communities.

The analysis carried out by EurAc amongst 28 partners in the region highlights a disconnect between the stated ambitions of the Global Gateway and how well it is understood and embraced at local level. Whilst the initiative is generating high expectations regarding the opportunities it could offer, knowledge of its objectives, projects and implementation methods remains limited. 23 out of 28 respondents have already heard of the Global Gateway, but only 6 consider themselves to be familiar with it. There is a paradox between extensive European communication on the subject and information that struggles to reach organisations on the ground. At the same time, CSOs and the communities concerned are not sufficiently consulted: 20 respondents have never been consulted in connection with a Global Gateway project. This situation fuels confusion about the respective roles of the EU, its Member States and the various stakeholders involved, and reinforces the perception of the Global Gateway as an instrument serving European strategic interests rather than as a genuine means for a partnership.

The expectations expressed by the partners go beyond the mere economic benefits of the investments. Whilst job creation, the development of local economic activities, access to infrastructure and the strengthening of value chains are priorities, the partners also emphasise the importance of placing the objectives of peace, security, good governance, respect for human rights and citizen participation at the heart of Global Gateway projects. These expectations vary, however, depending on local contexts, highlighting the need for an approach tailored to the realities and specific characteristics of each region. Our partners also express concern that these investments may perpetuate existing imbalances, particularly if they prioritise the extraction and export of resources at the expense of the needs of local communities and economies. The Lobito corridor project is a particularly telling example of these tensions. Beyond the objectives of regional connectivity and the supply of raw materials, communities expect tangible benefits, such as improved transport links, easier access to markets and local jobs.

The roll-out of the Global Gateway is coming up against regional realities that the EU cannot ignore. In eastern DRC, flagship projects such as the Kivu-Kinshasa Green Corridor and the Ruzizi III hydroelectric project are located in areas affected by conflict and regional tensions, whilst conflict sensitivity remains, for the time being, poorly integrated into the initiative. Political uncertainty, linked to the debate on constitutional reform in the DRC and the approach of the 2027 presidential election in Burundi, undermines the continuity of commitments. Corruption and weak oversight mechanisms leave investments vulnerable to misappropriation of funds. Finally, the crackdown on civil society, particularly in Burundi and Rwanda, deprives projects of essential accountability and early-warning mechanisms. These risks do not merely jeopardise the success of the projects. Without safeguards, an investment presented as a driver of development may reinforce unequal power relations, fuel tensions and undermine the EU's image as a reliable partner.

The Global Gateway's so-called "360-degree approach" could make it possible to take better account of these interdependencies and address them, provided that it is translated into operational criteria, verifiable indicators and monitoring mechanisms tailored to local contexts. It should go beyond a general principle and provide clear, actionable guidance for project identification, impact assessment, and decision-making to address and mitigate risks or negative impacts when they arise.

For the EurAc network, enhancing the relevance of the Global Gateway in the Great Lakes region involves focusing on four complementary pillars:

1) **Systematically integrate issues relating to peace, governance and human rights into the core of Global Gateway projects.** Risk assessments must take into account the dynamics of conflict, corruption and the potential impact on local communities. Safeguards and monitoring mechanisms must be put in place to prevent harm and, where necessary, to redirect or suspend projects.

2) **Channel investment into local priorities and economies.** The communities concerned and CSOs must be involved from the project design stage, rather than merely being informed of decisions that have already been taken. Investment must promote the creation of decent jobs, local value chains and sustainable socio-economic benefits.

3) **Develop a genuinely regional approach.** Projects must take account of the economic, political and security interdependencies between the DRC, Burundi and Rwanda, and be aligned with the EU's renewed strategy for the Great Lakes region, which serves as the framework for European action in the region. Better regional coordination, in particular through joint project planning by EU delegations, can help to address cross-border needs whilst minimising the risk of exacerbating tensions.

4) **Make civil society a fully-fledged partner.** This entails accessible and transparent information, regular and inclusive consultations through a dedicated regional framework, independent complaints mechanisms, and funding to enable CSOs to contribute to the monitoring of investments. In contexts where civic space is severely restricted, confidential and secure channels for participation must also be provided.

I. Introduction

Launched in late 2021, the Global Gateway has, in just a few years, established itself as a central element of the European Union's (EU) foreign policy discourse and strategy, as the EU seeks to assert its strategic interests against a backdrop of intensified geopolitical competition. By combining the financing of major infrastructure projects across several key sectors, the joint mobilisation of public and private funds under the "Team Europe[1] approach", and the promotion of a model that respects social, environmental and governance standards, the EU aims to make the Global Gateway a strong alternative to other international investment models.

However, the Global Gateway is not merely a comprehensive funding strategy across 11 key sectors, which include, in particular, transport, communications, energy and critical minerals. In recent years, it has gradually expanded beyond its initial scope to the point of redefining the way in which the EU designs and implements its external action and international cooperation. This momentum is set to accelerate in the context of negotiations on the EU's next Multiannual Financial Framework (MFF). Indeed, the European Commission has proposed allocating €200 billion[2] to the future "Global Europe" instrument for the period 2028–2034, whilst, in its conclusions of 15 June 2026, the Council explicitly designated the Global Gateway as a key pillar of the Union's external action. **These developments suggest that the Global Gateway could gradually become the benchmark framework for European external action and cooperation.**

However, this shift raises significant questions about how the EU designs and implements its international partnerships. Indeed, a strategy of this scale cannot be credibly sustained in the long term if it is too opaque and drawn up without genuine dialogue and the inclusion of European civil societies and the partner countries concerned. Even more worrying is that, by placing its geostrategic interests, the security of its supplies and European competitiveness at the heart of its external action, the EU runs the risk of seeing development objectives relegated to the background in the name of other interests deemed to be priorities. Yet the reduction and eradication of poverty constitute the primary objective of the Union's development cooperation. The European Treaties enshrine the promotion of sustainable economic, social and environmental development in partner countries, as well as environmental protection and the fight against climate change, amongst the objectives of its external action. They also establish the defence of human rights, democracy and the rule of law as guiding principles of this action.

[1] What is the Europe Team?
DG INTPA
[2] Amount now reduced to 157 billion euros following a proposal by the Irish Presidency

The rise of the Global Gateway therefore raises a fundamental question: **is the EU prepared to leave some of its historic commitments behind in the name of the strategic and economic interests at the heart of the Global Gateway?**

This tension manifests itself in a particular way in the Great Lakes region. Owing to its significant potential in terms of the global energy transition, new information and communication technologies, and the defence sector, the region has become a strategic area for the roll-out of the Global Gateway in Africa. A series of announcements regarding "flagship[3]" projects, notably the Lobito Corridor[4] and the Kivu-Kinshasa Green Corridor[5], illustrates the region's importance within this new framework. However, the controversies sparked by the signing of memoranda of understanding on critical minerals between the EU and the DRC, and subsequently with Rwanda, highlight the tensions between European ambitions and the realities of a region marked by armed conflict, persistent insecurity, regional tensions, the closure or restriction of civic spaces, and governance deficits. In this framework, the Global Gateway's ability to generate positive outcomes for local populations can be questioned. Unless its operational approaches are adapted to local risks and dynamics, **the initiative could, on the contrary, exacerbate existing vulnerabilities, thereby compromising both its development objectives and its own credibility.**

In light of these developments, the Europe-Central Africa network (EurAc) advocates for an approach rooted in local realities and needs. With this in mind, we gathered and analysed the views of our local partners to better understand how the Global Gateway is perceived on the ground. This policy brief sets out the key findings from a questionnaire designed and distributed to our partners in three countries of the Great Lakes region: the Democratic Republic of the Congo (DRC), Burundi and Rwanda. The questions were organised into several thematic areas, including overall understanding, identified sectors and projects, the quality of communication, and expectations regarding the Global Gateway. A total of 28 responses were collected, mainly from civil society organisations (CSOs) operating in the DRC and Burundi across various sectors[6]. Interviews were subsequently conducted with several of the respondents to explore certain aspects of the study in greater depth. It is important to note that the data collected through this questionnaire has several limitations, particularly regarding sample size and geographical representativeness. The primary aim of this analysis is to identify the limitations and opportunities of the Global Gateway initiative in the Great Lakes region based on the perspectives of several organisations working on the ground.

[3] List of Global Gateway projects, DG INTPA
[4] Lobito Corridor overview page, DG INTPA
[5] Green Corridor overview page, DG INTPA
[6] Sectors of activity including, in particular: human rights, the environment and the green transition, governance, peace and security, citizen participation, civic space, humanitarian aid, health and economic development (non-exhaustive list)



II. How is the Global Gateway perceived in the Great Lakes region?

The responses gathered highlight several trends and areas for attention regarding perceptions of the Global Gateway. They reveal a paradox: whilst the initiative raises high expectations regarding the opportunities it could offer, actual understanding remains limited. This disconnect raises questions about its objectives, how it is being implemented, and the role of local stakeholders, highlighting widespread uncertainty about the initiative on the ground.

1. The initiative raises high expectations

One key finding from the questionnaire is the generally favourable perception of the EU and the Global Gateway, mainly linked to the prospects for economic development and improved living conditions in the region. Expectations largely centre on the benefits that investments could bring to local communities and businesses. When asked to define the Global Gateway, respondents described it as *"a multi-sector initiative with a real impact on the ground*[7]*"*, *"a far-reaching economic and financial strategy aimed at offering alternative opportunities for trade, connectivity and sustainable development*[8]" or *"an EU tool to support the development of the Great Lakes region*[9]*"*. In contexts characterised by poverty and significant vulnerabilities, economic development is also seen as a driver of peace and stability. Some responses therefore draw a link between poverty, a lack of opportunities and conflict, and emphasise the importance of tackling these factors to contribute to long-term stability in the region.

However, this positive perception does not necessarilty translate to unconditional support. For the respondents, the development dimension must remain at the heart of the Global Gateway, with projects that have a positive, visible and sustainable impact on the ground and, above all, meet the needs expressed by the communities. Several responses thus refer to an approach *"based on local development*[10]*"*, which *"contributes to development*[11]*"*, promotes *"sustainable development and poverty reduction*[12] and meets *"the Sustainable Development Goals by 2030*[13]*"*.

[7] Respondent 2
[8] Respondent 12
[9] Respondent 6
[10] Respondent 1
[11] Respondent10
[12] Respondent 26
[13] Respondent 8

The initiative's geopolitical dimensions and competitiveness objectives are not necessarily contested, but, according to our partners, they should not take precedence over development objectives. Expectations also extend beyond mere economic investment. When asked about the sectors most relevant and likely to have an impact on the region, respondents cited infrastructure projects in the energy and transport sectors, as well as the promotion of peace and security, governance, social cohesion, the protection of human rights and the environment, and regional integration. Considerations relating to gender and youth were also mentioned on several occasions.

However, the responses reveal differing priorities amongst CSOs in the region, particularly in the DRC. For CSOs based in eastern DRC, projects relating to governance and security are predominantly identified as likely to have an impact on the ground, whilst in the rest of the country, expectations focus more on transport and the energy sector. In Burundi, partners' expectations are more strongly centred on economic development, particularly in the health and education sectors, but also on issues of governance, civic space and citizen participation, whilst highlighting the restrictions that hinder CSOs' work in these areas. One respondent even refers to some "Sword of Damocles", forcing Burundian CSOs to *"shift their focus to other, less contentious areas*[14]*"*.

These differences show that expectations regarding the Global Gateway are closely linked to local realities, arguing for an approach tailored to the needs of each specific context.

[14] Respondent 22

2. The initiative is well-known but difficult to grasp

A more in-depth analysis of the responses regarding the content of this initiative shows that, **while the Global Gateway has attracted considerable interest among our partners, its objectives, scope, and implementation remain poorly understood.** Of the 28 representatives of organisations who took part in the study, 23 stated that they had already heard of it. However, when asked in more detail about their level of knowledge, 3 respondents indicated they had none, 11 had very little knowledge and 8 had an average level of knowledge, com-

compared with only 6 who considered themselves to have a good to very good understanding of the Global Gateway. Geographical disparities are also emerging, with Burundian CSOs and Congolese CSOs based in the east making up the majority of respondents who stated they were unfamiliar with the Global Gateway.

This limited level of awareness is also evident when it comes to identifying specific projects and the actors involved. Respondents struggled to distinguish between projects under the Global Gateway and those funded through other European or bilateral channels. Some responses thus refer to the Uvinza–Musongati railway linking Tanzania to Burundi, with the African Development Bank as the main donor, or to the Great Lakes Trade Facilitation and Integration Project (GLTFP), which is entirely supported by the World Bank. It is also difficult to clearly identify who decides on, finances and implements the projects. In total, 18 respondents stated that they did not know which projects are being funded in their country, nor the amounts allocated to them. One of them pointed out: *"we are aware of several Global Gateway initiatives and areas of intervention in the region, but we feel that the information available to local organisations and communities remains insufficiently detailed to allow us to gain a comprehensive overview of all the projects*[15]". Among the best-informed partners, the same projects are repeatedly mentioned, namely the Lobito Corridor, the Kivu-Kinshasa Green Corridor and the Ruzizi III hydroelectric project.

Finally, this confusion is reflected in the responses regarding the role that local organisations could play in the implementation of the projects. As one respondent summarises[16], it is *"difficult to know, given that we do not know everything that is being done as part of this initiative".*

[15] Respondent 28
[16] Respondent 20

3. The initiative suffers from a lack of transparency

Analysis of the questionnaire responses confirms a persistent lack of communication, information and transparency surrounding the Global Gateway – an issue that has been highlighted for several years by European CSOs – which contrasts with the EU's stated ambition of a partnership of equals. However, as several respondents emphasise, to be effective, such partnerships require *"open communication, where every voice counts*[17]", but this necessitates a shift from a communication strategy that is essentially "marketing-oriented" to one that serves as a *"governance tool ensuring that local communities are the first to be informed*[18]".

Respondents do indeed express a desire to better understand the initiative and to be more closely involved in it, but on condition of *"equitable access to information*[19]*". One respondent goes further and states: "Civil society should be a communication partner, not just a bystander*[20]". The responses received confirm this need: 19 out of 28 respondents consider this communication to be 'not very transparent' or 'not transparent at all'. The reasons cited include a lack of local dissemination of information (23 respondents), low involvement of local stakeholders (19 respondents), the absence of easily accessible and usable public data (12 respondents) and the excessive centralisation of information (10 respondents). The lack of information available in local languages is also a significant barrier, further limiting access for local communities and organisations to information about the projects.

Another factor that reinforces this analysis concerns the extent to which local stakeholders are consulted. Indeed, out of 28 respondents, 20 had never been consulted in connection with a Global Gateway project. For those partners who had been consulted, this was most often via intermediaries such as their European partners, and rarely in a direct and structured manner. Three respondents nevertheless mentioned the EU Delegation in the DRC as a point of contact, but in the context of ad hoc exchanges not necessarily linked to a specific Global Gateway project.

[17] Respondent 9
[18] Respondent 1
[19] Respondent 28
[20] Respondent 18

4. The initiative is linked to extractivism

Another point of concern, specific to the context of the Great Lakes region, relates to the prominence given to the extractivist narrative. Indeed, several of our partners associate the Global Gateway with a desire to secure supplies of mineral resources for the benefit of European industry. One respondent summarised their perception of the initiative as follows: "The Global Gateway is a European strategy aimed at securing the supply chain for strategic minerals such as copper and cobalt". This interpretation is also reflected in the list of projects that respondents spontaneously associate with the Global Gateway, notably the Lobito corridor. This high profile appears to be due to the extensive communication efforts undertaken by the EU regarding this project, as well as the scale of the investments mobilised, estimated at nearly 2 billion euros[21].

Several concerns arise from this analysis, particularly regarding the local impact of mining projects and the risk that they may contribute to the conflict economy. Partners fear that the export of raw minerals, without local processing or the development of value chains, will replicate the economic models already at work in the region, with limited benefits for local economies and populations. In this regard, one respondent[22] emphasises that "the Lobito corridor will further favour an export-oriented economy in the DRC, as the minerals will be exported in their raw state". In eastern DRC, this concern is compounded by the risk that the resources mobilised may be appropriated by actors involved in the conflicts, indirectly benefit armed groups, or reinforce certain economic and political interests. One respondent sums up this concern with a question: "What mechanisms has the EU put in place to prevent the Global Gateway from exacerbating existing conflicts[23]*?" For the partners,* **the main challenge is therefore to ensure that the projects generate local economic benefits without reinforcing the dynamics of conflict affecting the region.**

[21] Lobito Corridor overview page, DG INTPA
[22] Respondent 25
[23] Respondent 27

The findings point to an inherent tension in perceptions of the Global Gateway. The same respondents who associate the initiative with development, peace, security, good governance, and poverty reduction also link it to the pursuit of strategic natural resources. **This interpretation is not contradictory, but it reminds us of the importance for the EU to ensure that its geo-economic ambitions do not take precedence over development objectives and locally expressed needs.**

The example of the Lobito corridor: strategic ambitions versus local realities

As part of the Lobito Corridor project, EurAc member organisation International Peace Information Service (IPIS) conducted a study amongst communities and provincial and local authorities along the Kolwezi–Dilolo route, focusing on perceptions of the opportunities and risks associated with the corridor's development. Four key points emerge from this analysis:

- **The Lobito Corridor is a flagship project of the Global Gateway, but its impact on development remains opaque:** whilst it is primarily designed to improve the transport of minerals from the DRC and Zambia to the port of Lobito, the EU presents this corridor as a broader project for development and regional integration. However, without investment in access roads, railway stations, freight capacity and reliable services, improvements to the railway infrastructure alone will not be sufficient to generate local development.

- **Communities broadly support the railway project, but their expectations differ from the rhetoric of donors and mining companies:** along the Kolwezi–Dilolo route, almost the majority of those surveyed said they were in favour of railway development. Their main expectations relate to the introduction of regular passenger services, the transport of local agricultural produce and the creation of local jobs. However, these needs remain largely unaddressed by private investment and donor funding allocated to railway development.

- **Local participation and a fair distribution of benefits will be essential to contributing to the region's development:** communities expect the corridor to generate jobs, particularly for young people, with priority given to the local workforce. They also want agricultural producers and small local businesses to be able to access the corridor and participate in emerging value chains, rather than seeing this infrastructure benefit mining companies. The case of Kasaji is emblematic in this respect: although it is the province's second-largest town and lies at the crossroads of numerous agricultural areas, it is reportedly not being considered in the rail rehabilitation project.

- **Meaningful consultation remains a weak point of the project:** three-quarters of those interviewed along the corridor said they were aware of the project, but the information often came from rumours or social media. For their part, local CSOs and other stakeholders, such as drivers' unions, reported that they had not been officially consulted. These shortcomings raise questions about local ownership of a project that is nevertheless presented as a driver of development for the region.

The Lobito Corridor illustrates that the scale of investment alone is not sufficient to gauge a project's impact on the region's development. Beyond the staggering sums committed and the expected mining flows, the corridor's success will therefore have to be measured by its tangible benefits for local communities. In this regard, IPIS identifies four key dimensions for making Lobito a genuine development corridor: connectivity, governance, inclusion and the management of economic transition.



III. An ambition that comes up against regional realities

Analysis of the responses collected through this questionnaire has highlighted both the expectations raised by the Global Gateway and its limitations. Whilst the initiative aims to bring about a fundamental shift in the European approach to international cooperation and partnerships, its implementation in a fragile context such as the one of the Great Lakes region is undermined by specific realities. These must be taken into account if the EU aims at genuinely contributing to the objectives of stability and peace - preconditions necessary for the successful implementation of this strategy.

1. The Global Gateway in the face of conflict and insecurity

A key concern, specifically raised by partners based in eastern DRC, relates to the fragile security and humanitarian context in which the Global Gateway intends to operate. Ongoing conflicts in the Kivus and Ituri, compounded by other pockets of tension and violence in several regions of the country – notably in Kasai and Katanga – continue to undermine the livelihoods of local populations and economic activities. Despite the various peace processes and ongoing negotiations, the situation remains unstable and commitments are struggling to translate into tangible improvements on the ground.

Against this backdrop, several of our partners are questioning the Global Gateway's ability to achieve its objectives in places where the minimum conditions for stability are not in place and where violence is a daily occurrence. As long as insecurity and forced displacement continue to affect local populations and economic actors, investments in infrastructure, transport, and natural resources will fail to deliver the desired outcomes. This is the case with the Kivu-Kinshasa Green Corridor and the Ruzizi III hydroelectric project, both located in areas directly affected by the conflict in eastern DRC and by regional tensions. However, conflict sensitivity remains poorly integrated into the Global Gateway. According to ECDPM[24], there is little evidence of the systematic application of European conflict analysis frameworks to projects, and the initiative currently lacks both clear commitments and guidelines for infrastructure projects.

[24] Global Gateway investments in fragile settings: How to do it? ECDPM, 21 November 2025

It is equally important to recognise that investments are not merely affected by conflict; they can also influence conflict dynamics and, in some cases, exacerbate them. Security cannot be reduced to a precondition for projects or to their protection. It requires inclusive governance, underpinned by local institutions capable of fulfilling their responsibilities, effective community participation in decisions affecting their territory and their access to economic opportunities, and the establishment of mechanisms to ensure the equitable sharing of benefits. These requirements are particularly important in sectors linked to natural resources and agricultural value chains. By intensifying competition for land and resources, investments carried out without consulting communities or ensuring a fair sharing of benefits risk fuelling a sense of exclusion and stoking existing tensions.

2. The Global Gateway in the face of political instability

Beyond security concerns, the political instability characterising several countries in the Great Lakes region also constitutes a risk factor for investment. Institutional crises, political tensions and weak state capacity can affect the continuity of public policies, and consequently the long-term implementation and monitoring of projects. Shifts in priorities, uncertainties surrounding reforms or the electoral calendar, as well as the fragility of certain institutions, are also likely to delay projects or call certain commitments into question. **The predictability and robustness of the political and institutional framework thus appear to be key conditions for the sustainability of investments.**

The DRC is a particularly telling example of these risks. The ongoing debate over a constitutional amendment and a possible third term for President Tshisekedi, as well as the concerns expressed by the opposition and sections of civil society regarding the electoral timetable, are helping to perpetuate a climate of political uncertainty. The recent announcement of the formation of the Front for the Refoundation of the Nation (FRN), a new political-military alliance encompassing the AFC/M23, adds a further layer of unpredictability. In certain areas, a new political crisis could reignite existing cycles of violence and trigger fresh clashes between communities.

Given that trust in institutions is limited, these uncertainties raise questions about the Congolese state's ability to sustain, over the long term, the commitments necessary for investment to materialise. Similarly, in Burundi, the concentration of political power in the hands of the CNDD-FDD and the prospect of the 2027 presidential election are fuelling a climate of uncertainty. Added to this is a highly fragile economic and financial situation, characterised by shortages of foreign currency and fuel – all factors that could affect national and regional projects.

[25] Transparency International, Corruption Perception Index, 2025
[26] Respondent 28

3. The Global Gateway and the challenges of corruption and poor governance

In addition to these risks, there are significant weaknesses in governance and legal systems. In terms of perceived corruption, the DRC and Burundi are among the states that classify at the bottom of the ranking (implying that the perceived corruption rates are very high) [25]. Whilst this indicator does not, on its own, reflect the full range of governance issues, it does provide a fairly accurate picture of the environment in which investments are to be implemented. Inadequate oversight mechanisms, weak institutions and impunity can indeed foster mismanagement, opaque contract awards, favouritism or the misappropriation of funds.

These vulnerabilities have direct repercussions on local communities. Legal uncertainty, in particular, places local communities at a disadvantage when they have to defend their interests against companies with greater resources and bargaining power. It can also limit the benefits that projects bring to local communities and exacerbate inequalities. This issue is particularly acute in Burundi, where corruption affects many public sectors against a backdrop of institutional weakness and persistent impunity.

As one respondent emphasised, "the EU must assist Burundi in sectors that directly affect the population and set guidelines to ensure that this does not benefit the government[26]".

In the DRC, the same concerns are expressed regarding the management and oversight of investments. One respondent emphasises that *"financial malpractice is common in this type of project in the DRC, and goes unpunished*[27]*"*.

For the partners interviewed, these risks also raise a question of credibility. If investments are perceived as primarily driven by strategic considerations, without sufficient safeguards regarding governance, human rights and democratic principles, the EU risks undermining its image as a reliable partner. **Good governance should not be regarded as a peripheral aspect of the Global Gateway, but as one of the conditions for its success.** Beyond ensuring their physical security, the protection of investments requires transparency in their allocation and implementation, as well as the strengthening of institutions and effective oversight and redress mechanisms.

In fragile contexts, these safeguards are all the more necessary given that the 'Global Europe' proposal – the future funding instrument for the Global Gateway – would allow direct grants, without a call for proposals, to be awarded to EU-based companies for projects deemed to be of 'strategic interest', particularly in the critical raw materials sector[28].

[27] Respondent 12
[28] A companion guide to the Global Europe instrument proposal, ECDPM, 21 juillet 2025

4. The Global Gateway in repressive environments

Another key concern from our partners' perspective relates to partnerships with authoritarian regimes and, more broadly, the implementation of projects in environments where civic space is severely restricted. This issue is particularly relevant for our Burundian partners, who are questioning the safeguards put in place to ensure the effective, free and secure participation of civil society in Global Gateway projects. Indeed, since the 2015 crisis, the country has been marked by persistent and systematic repression of dissenting voices, which has resulted especially in violence, arbitrary arrests, enforced disappearances and the exile of numerous civil society actors. In such contexts characterised by a restricted civic space and legislative frameworks that are increasingly restrictive for CSOs, traditional consultation mechanisms are insufficient to guarantee the full and

effective participation of these actors. **Our local partners therefore emphasise the need for the EU to adapt its methods of dialogue and consultation to the national context, particularly where the scope for action of civil society actors is severely limited.**

However, this lock-in also poses a risk to the investments themselves. When civil society is unable to fulfil its role independently, projects are deprived of essential accountability and early-warning mechanisms for reporting abuses, social and environmental risks, or for detecting the misappropriation and exploitation of projects by elites or dominant actors, thereby limiting their impact and sustainability.

The recent conclusions of the Council[29] and the European Parliament's report[30] on the implementation of the Global Gateway both highlight the still overly limited role of civil society and call for its participation to be strengthened in partner countries. **In the Great Lakes region, however, this ambition cannot be realised without genuinely taking into account the specific constraints and risks faced by CSOs in the region and putting in place adaptation strategies aimed at encouraging their participation.** Otherwise, the EU's stated objective of involving them more closely in the design, implementation and monitoring of projects risks remaining purely theoretical.

[29] Council conclusions on the Global Gateway strategy, Council of the EU, 15 June 2026
[30] European Parliament report on the Global Gateway, European Parliament, 5 March 2026

IV. The 360-degree approach: a response tailored to the reality of the Great Lakes region?

To address the limitations identified by civil society in the implementation of the Global Gateway, the European Commission is now promoting a "360-degree approach". By placing development objectives at the heart of the initiative[31], it aims to go beyond a mere infrastructure investment strategy. This new direction appears, at first glance, to be relevant in a fragile context such as that of the Great Lakes region, where inflexible funding instruments that are overly focused on profitability fail to meet the needs of the most vulnerable populations. However, the details of this approach remain unclear, particularly regarding its objectives and implementation arrangements. It is also raising questions within civil society, which fears that it may primarily constitute a shift in narrative designed to make the Global Gateway more acceptable to member states and partner countries.

It is precisely to inform these discussions that EurAc has chosen to build on the concerns expressed by its partners in the Great Lakes region. From this analysis, four pillars emerge as essential for making the Global Gateway a tool that can produce positive, visible and sustainable impacts on the ground. Through these recommendations, EurAc aims to contribute to the debate surrounding the 360-degree approach and to advocate for it to result in European action that is more firmly rooted in the priorities and needs of its partners, and consistent with the framework the EU has set for itself through its renewed strategy for the Great Lakes.

Pillar 1: Placing peace, security and good governance at the heart of Global Gateway projects

In a fragile context such as that of the Great Lakes region, Global Gateway projects cannot be separated from the political, security and institutional dynamics within which they operate. For our partners, it is not enough to create the conditions for projects to be implemented; the projects themselves must also contribute to lasting peace and stability. Issues linked to governance, justice, human rights and security must therefore be integrated right from the design and selection stages of projects. Several partners even believe that the Global Gateway could go one step further and serve as a genuine lever for placing these issues back at the centre of cooperation and political

[31] This approach is based on six principles: democratic values and high standards, good governance, transparency, equal and mutually beneficial partnerships, green and clean investment, security, and a catalytic effect on private investment.

dialogue with the countries of the region.

This requirement is in line with the "do no harm" principle and the Council's conclusions of 15 June 2026 on the Global Gateway[32], which call for reliance on risk analysis and the adoption of a conflict-sensitive approach. The European Parliament goes further: it considers that the Global Gateway does not yet fully address the complexity of fragile environments and calls for a better integration of investment, political dialogue, peace, stability and humanitarian action.

It is precisely this need that the 360-degree approach should address. In a context such as that of the Great Lakes region, it should enable the systematic assessment of projects' impacts on governance, human rights and conflict dynamics. In practical terms, this involves carrying out, at an early stage, an in-depth assessment of local contexts and the structural causes of conflict and updating it regularly; defining indicators to monitor the impact of projects on the ground, including developments in land disputes, community complaints or security incidents; and establishing mechanisms to adapt, reorient or suspend projects where they risk exacerbating existing vulnerabilities.

Finally, participatory governance programmes such as ESPER[33] demonstrate that the sustainability of investments in fragile contexts also depends on their being embedded within legitimate and enduring institutions capable of ensuring the continuity of public action beyond political cycles. This requires strengthening accountability mechanisms and effectively involving the communities concerned in decision-making, in order to foster their ownership of the projects and ensure that their benefits are sustainable.

[32] Council conclusions on the Global Gateway strategy, Council of the EU, 15 June 2026
[33] ESPER (*Ensemble pour la sécurité et la paix dans l'est de la RDC*), a Congolese government programme implemented since 2020 by Cordaid in North Kivu, South Kivu and Ituri, with funding from the Netherlands.

Pillar 2: Building the initiaitve from the bottom-up with a genuine local impact

The Global Gateway will only manage to fulfil its development ambitions if it is genuinely rooted in the realities and priorities of communities, and if it makes a concrete contribution to improving their living conditions and effectively realising their rights. As one respondent put it, *"true development begins at local level with the communities*[34]". This necessity is also recognised at European level: the European Parliament has highlighted the limitations of an overly "top-down" approach and called for the real needs of partner countries to be placed at the heart of the Global Gateway, whilst the Council emphasises local ownership and early, meaningful engagement with authorities and CSOs throughout the project cycle.

[34] Respondent 8

In practice, this means building on development priorities defined at national and local levels, rather than on projects primarily designed at European level. Communities and local authorities must be consulted in the areas concerned as soon as needs are identified and projects selected, prior to any approval, and then involved at every stage of the cycle: design, implementation and evaluation. Genuine ownership, however, requires going beyond mere consultation. Co-decision-making mechanisms, such as steering committees bringing together local authorities, communities and CSOs, as well as partnerships with local economic stakeholders, must give them real influence over decisions.

This approach also involves rethinking the way in which projects are evaluated. Their impact should not be measured solely in terms of economic benefits or the amounts invested, but also in terms of their contribution to reducing poverty and inequality and to bringing about tangible improvements in people's living conditions, particularly those of the most vulnerable. This requires transparent accountability mechanisms, enabling public scrutiny of projects and ensuring a fair distribution of their economic benefits.

Pillar 3: Ensuring the Global Gateway as part of a genuine regional approach

In the Great Lakes region, local focus must necessarily be complemented by regional approach. Indeed, the region's economic, political, security and social dynamics are characterised by deep interdependence, and **projects designed at the level of a single country can have significant repercussions beyond its national borders**. As one respondent put it, *"links between countries are essential to the survival of communities, especially in eastern DRC*[35]*".* Several partners are therefore calling on the EU to better integrate the cross-border dimension and regional economic development when selecting Global Gateway projects. One of them emphasises the need *"to avoid a strictly national approach to issues relating to natural resources, value chains, regional trade and environmental protection*[36]". This requirement is also in line with the EU's renewed strategy for the Great Lakes region. As the framework for all European action in the region, it highlights the objective of moving *"from competition to cooperation and integration*[37]*"* by drawing mostly on cross-border trade, regional corridors and regional civil society dynamics.

Such an approach requires **promoting projects involving several countries.** The corridor model often highlighted by the Global Gateway as flagship projects should be the subject of further consultation, at both national and regional levels. This strategy is particularly relevant in the Great Lakes region, where the interdependencies between countries make cooperation and dialogue between stakeholders essential. However, it requires reliance on civil society, which can play a role in strengthening ties between cross-border communities, facilitating the flow of information and fostering the emergence of a regional vision for the projects.

Several partners have therefore suggested **the creation of a sub-regional hub** to improve information sharing and strengthen exchanges between the relevant stakeholders, in order to ensure that these projects genuinely meet development objectives. Such network-

[35] Respondent 8
[36] Respondent 28
[37] Renewed EU Strategy for the Great Lakes, Council of the EU, 20 February 2023

ing initiatives already exist amongst civil society actors, but would benefit from being more structured and supported, notably through dedicated funding and more systematic involvement of local and national authorities, the private sector and international donors.

On the European side, although the EU already has several regional 'Team Europe' initiatives, Global Gateway investments are still largely programmed on a country-by-country basis. The next programming period (2028–2034) offers an opportunity to move beyond this compartmentalisation by **strengthening coordination between EU delegations in the Great Lakes region** so that they can jointly programme regional projects.

Pillar 4: Making civil society in the Great Lakes region a key partner

The success of the Global Gateway in the Great Lakes region will depend largely on the role assigned to European and local civil society, a role that must go far beyond mere consultation.

Firstly, it is essential to adapt participation mechanisms to the realities of the region. The Global Gateway Civil Society and Local Authorities Advisory Platform, established in 2023, quickly revealed its limitations, particularly because it brings together stakeholders from very different backgrounds. In the Great Lakes region, **a dedicated regional mechanism** would help to avoid excessive centralisation of the decision-making process and better consider the region's political and social realities, including the restrictions on civic space in certain countries. These restrictions must not lead to the exclusion of local civil society; it should instead prompt the EU to guarantee effective access to information, provide for secure consultation procedures and protect those who report abuses.

Civil society must also be involved throughout the entire project cycle, from the identification of needs to evaluation. Such co-design would improve the relevance and feasibility of projects, whilst enabling better anticipation of their environmental, social and human rights impacts. Equally important is its role in monitoring and accountability, through independent oversight of transparency, resource use and adherence to

commitments. This involvement must include both local CSOs, which contribute their knowledge of local realities and needs, and European CSOs, which can monitor compliance with EU standards and frameworks. **However, to be able to fulfil this role fully, CSOs must have sufficient resources and capacity.** These should be ensured through dedicated funding that guarantees the CSO participation without creating dependence on the actors responsible for the actual project implementation.

[38] Respondent 12

Civil society also acts as a vital conduit for **making information on the Global Gateway accessible at local level.** Through awareness-raising campaigns, community workshops, webinars and collaboration with local media and faith-based organisations, it can help raise awareness of the initiative and its projects amongst the communities concerned.

Finally, c**ivil society plays an advocacy and mobilisation role.** By bringing the voice of communities into decision-making forums and helping to create, at local level, the conditions necessary for the success and sustainability of projects, it strengthens their credibility, ensures the ongoing commitment of communities, and thereby reduces the risk of tensions and conflicts. As one of the partners clearly puts it, civil society plays a "fundamental role as a bridge between institutions and the grassroots, ensuring the inclusivity, sustainability and social acceptance of projects[38]".

This full and complete inclusion of civil society actors is all the more essential as it helps **to fill the gap left by international partners in certain areas.** Security developments have, in fact, restricted the presence and operational capabilities of many international actors on the ground. Local organisations, which have a presence and networks rooted in the communities, are therefore particularly well placed to monitor local dynamics, report on developments on the ground and contribute to a better understanding of the needs and risks associated with projects.

V. Recommendations

To the EEAS, the European Commission and EU delegations:

- **Implement the Global Gateway in line with the objectives of the EU's renewed strategy for the Great Lakes region and adopt a genuinely regional approach.** The Council has made this strategy the reference framework for all EU action in the region. Consequently, Global Gateway projects should be designed, selected and evaluated in the light of its objectives, in particular regional integration. This involves prioritising multi-country projects, conceiving corridors as spaces for cooperation that take account of their impact on communities, and jointly programming regional projects between EU delegations in the next programming period.

- **Incorporate respect for human rights, the pursuit of sustainable stability and good governance as priority criteria for project selection and implementation.** In a context as fluctuating as that of the Great Lakes, this entails a systematic conflict sensitivity analysis, updated throughout the project cycle, covering political, security and social risks as well as the project's effects on local and regional conflict dynamics. Independent monitoring mechanisms, drawing in particular on CSO networks where international partners have a limited presence, should enable alerts to be raised directly with the European authorities and, where necessary, for projects to be reoriented or suspended.

To the European Commission and EU delegations:

- **Institutionalise the participation of local and European civil society throughout the Global Gateway project cycle.** Such inclusion will only be possible through the establishment of a separate mechanism, tailored to the realities of the Great Lakes region and endowed with a clear mandate: a) access to information, b) contribution to project design, c) monitoring of implementation and formulation of recommendations. This mechanism could take the form of a sub-regional hub, bringing together civil society, communities, local authorities and economic actors. At project level, local steering committees involving these same stakeholders should have genuine co-decision-making powers. In contexts where civic space is restricted, alternative and secure methods of participation should be planned for (remote consultations, confidential channels or the involvement of CSOs in exile).

- **Improve transparency and access to information on the Global Gateway.** By ensuring the accessible and timely publication of information relating to projects, their objectives, funding, partners and impact assessments, so as to enable effective public scrutiny of their implementation. The information should be available in formats and languages that are easily accessible to local communities and CSOs. The EU should also draw on civil society's capacity to relay information to disseminate and contextualise this information at local level, in particular through awareness-raising activities, community workshops, webinars or by working with local media and faith-based organisations.

To the European Parliament and Member States, in the context of negotiations for the next Multiannual Financial Framework (MFF):

- **Ensure that the Global Gateway complements, rather than replaces, development cooperation instruments in the Great Lakes region.** Grant funding and concessional instruments must remain available for those components of the 360-degree approach that are not driven by a profit-making rationale. They must also continue to benefit territories and populations that cannot be reached by investments based on profitability criteria, particularly in conflict zones. The mobilisation of private funding under the Global Gateway should therefore remain additional and complementary and should not lead to development aid being diverted from its primary objectives.

- **Ensure, in the next MFF, dedicated funding to enable local CSOs to participate fully in processes related to the Global Gateway.** This funding should be multi-annual, flexible and accessible to small local organisations. It should cover capacity-building on technical and financial issues specific to the Global Gateway, as well as the costs associated with the organisations' security in high-risk contexts.

To Member States and European financial institutions:

- **Ensure that the Global Gateway complies with and strengthens European rules on the responsibility of businesses and financial institutions regarding human, social and environmental rights.** Access to its funding and guarantees should be conditional upon effective due diligence, in particular in accordance with the Corporate Sustainability Due Diligence Directive (CSDDD), but also for actors and minerals not covered by these regulations. Particular attention should be paid to supply chains for natural resources, risks associated with conflict economies, and the impacts of investments on local communities.

- **Establish accessible, independent and secure grievance and complaints mechanisms.** These mechanisms should be accessible to affected communities and local CSOs, as well as to international CSOs representing or supporting the interests of communities. They should enable the confidential reporting of negative impacts, rights violations or issues related to project implementation, and ensure transparent follow-up on complaints and the responses provided.

EurAc wishes to emphasise that none of these recommendations can be implemented by a single actor. The Global Gateway is based on a shared architecture involving the EEAS, the European Commission, the EU delegations, the Member States and the European financial institutions. **Its effectiveness therefore depends on coordinated action at every stage, from the policy framework right through to the monitoring of projects on the ground.** It is precisely this coherence that is currently lacking, and it is on this basis that the 360-degree approach will be able to deliver tangible results for the people of the Great Lakes region.



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