POLICY BRIEF • CASA NEXUS ANALYTICAL REVIEW SERIES.

The INGO Reckoning.

A Post-Trump Adaptation.

Save Lives or Shape Out!

A Critical Policy Review of Humanitarian Actor Strategies at the Convergence of Conflict, Climate, and Compounding Crisis

Ochieng Onono-MeCOHD, MBA.

Co-CEO & Chairperson, CASA NEXUS Limited.

March 2026 • Nairobi, Kenya

Position Statement

The international humanitarian system is at a reckoning — not merely a funding crisis, not merely a political rupture, but a structural failure of purpose. The system built to save lives in conflict, famine, and disaster has expanded its mandate so far beyond its life-saving core that it now uses the language of climate resilience, sustainable development, and transformation to justify its existence in communities where people are dying today, not in a climatically modelled future.

This policy brief makes three arguments that the sector would prefer not to hear. First, the climate resilience mandate carried by INGOs into acute crisis settings is morally incoherent, operationally distracting, and institutionally self-serving. A family burying a child who died from cholera in South Sudan did not cause the climate crisis. They are not the appropriate target population for a climate adaptation programme. They need water, medicine, food, and safety. Second, the strategies declared by major humanitarian actors — OCHA, UNHCR, WFP, and the leading INGOs — are calibrated to organisational survival rather than the communities they claim to serve. Third, the Trumpist defunding rupture, catastrophic in its method, has created the only political window in a decade for genuine systemic reform. That window will close. What the sector does with it will define the next era of humanitarian action.

The brief proposes a specific policy architecture: a tiered mandate doctrine that separates the life-saving stratum from resilience and climate work by context, time, and actor type; a post-Trump financing compact built around anticipatory action and genuine localisation; and a clear test — save lives or shape out — for every INGO determining whether it still has a legitimate role in this system.

> **CORE THESIS.**
> The humanitarian system's expansion into climate resilience has diluted its life-saving mandate without measurably improving either life-saving outcomes or climate adaptation for affected communities. The sector must re-stratify its mandate, separate its actors by comparative function, and rebuild its financing architecture around the populations it exists to serve — not the reporting cycles it exists to satisfy.

Part I
The Compounding Crisis — What Is Actually Happening to Communities

1. The Scale and Character of Convergent Crisis.

The starting point for any honest policy discussion is what is happening to communities — not to organisations, not to funding pipelines, but to people. OCHA's Global Humanitarian Overview 2026 identifies 239 million people in humanitarian need, of whom 87 million face immediate life-threatening priority conditions requiring urgent response (OCHA, 2025a). That figure demands one critical footnote: OCHA adopted a narrower definition of humanitarian need specifically to align the appeal with funding reality — not because actual suffering has diminished. As the Norwegian Refugee Council noted on the day of the GHO 2026 launch: "The lower people in need figure does not mean that humanitarian needs have decreased — on the contrary, in many places the situation has worsened" (NRC, 2025). Behind these numbers are specific, verifiable realities: over 10 million people still displaced within Sudan at mid-2025 in conditions of acute food insecurity alongside active armed conflict — down from a peak of 14.3 million at end-2024 as people fled under adverse conditions rather than because the crisis resolved (UNHCR, 2025b). Two simultaneous famines unfolded in 2025 — in Gaza and Sudan — the first time in recorded history that two famines have occurred simultaneously (OCHA, 2025a). More than 380 aid workers were killed in 2025, the highest annual toll on record, while the 2025 humanitarian appeal received only USD 12 billion of USD 44 billion requested — the lowest funding level in a decade (OCHA, 2025a; Development Initiatives, 2025). An 80% reduction in food assistance to Syria in 2024 was not a policy choice. It was a consequence of money running out.

239M People in humanitarian need — GHO 2026 (OCHA, 2025a)	**117.3M** Forcibly displaced worldwide, mid-2025 (UNHCR, 2025b)	**83.4M** People living in internal displacement, end-2024 (IDMC, 2025)	**27%** 2025 GHO appeal funded — \$12B of \$44B (OCHA, 2025a; Dev. Init., 2025)

These are not statistics. They are policy failures — measurable, attributable, and preventable. Global Report by Internal Displacement Monitoring Centre (IDMC) on Internal Displacement 2025 records an unprecedented 83.4 million people living in internal displacement at the end of 2024 — the highest figure ever recorded, equivalent to the population of Germany, and more than double the figure from just six years ago (IDMC, 2025). Of these, 73.5 million were displaced by conflict and violence. Disasters triggered 45.8 million new internal displacements in 2024 alone — the highest annual figure since monitoring began in 2008 and more than double the decade average — with 29 countries reporting their highest disaster displacement figures on record (IDMC, 2025). Climate change is making these events more frequent and more severe: weather-related events triggered 99.5% of all disaster displacements in 2024 (IDMC, 2025). Critically, more than three-quarters of people internally displaced by conflict live in countries with high or very high climate vulnerability — compounding what are already catastrophic conditions (IDMC, 2025). In the Horn of Africa, the 2020–2023 drought was made at least 100 times more likely by climate change (UNHCR, 2023). In the Sahel, recurrent drought intersects with insurgency and governance collapse to create humanitarian emergencies that have not resolved across three decades of international investment.

Conflict and climate are not separate crises managed by separate systems. They interact. Conflict destroys the adaptive capacity that would allow communities to survive climate shocks. Climate shocks — drought, flood, harvest failure — generate resource competition that fuels conflict. Displacement from either driver removes communities from the land and livelihood systems that provide any resilience at all. This compounding is not theoretical — it is the lived condition of populations in Sudan, Somalia, South Sudan, DRC, Myanmar, Haiti, and dozens of other contexts where the label ‘protracted crisis’ has become a polite term for an abandoned population (UNHCR, 2023; IDMC, 2025).

> “These communities are not facing a climate adaptation challenge. They are facing an existential crisis in which climate has become one of several overlapping forces trying to kill them. The framing matters enormously for what interventions are appropriate and who should be delivering them.”
>
> **— CASA NEXUS Policy Analysis (reading across OCHA, 2024; UNHCR, 2023; IDMC, 2025)**

1.1 The Compounding Effect That Actor Strategies Miss.

The crucial analytical point — missed by most major actor publications — is that convergence does not simply add crisis upon crisis. It multiplies vulnerability. A household that has lost its livestock to drought has no buffer when conflict displaces it. A community that has seen its water table fall over five years has no resilience when flooding destroys the crops it was counting on. A population already food-insecure cannot absorb the market disruption of a stop-work order cutting food distributions. The State of the Humanitarian System 2022 by Active Learning Network for Accountability and Performance in Humanitarian Action (ANLAP), documents that the sector's evaluative and planning architecture was designed for discrete, bounded crises with predictable trajectories (ALNAP, 2022). It was not designed for — and has not adapted to — the compounding, non-linear, and mutually amplifying crisis dynamics that now characterise the majority of humanitarian operating environments. The consequence is that actors respond to symptoms while the structural drivers compound unaddressed.

Part II
Actor Strategies — What the Sector Claims and What It Does.

2. What Major Actors Say Versus What Their Behaviour Signals.

The gap between stated strategy and operational behaviour is the central accountability failure of the contemporary humanitarian system. Major actors publish compelling frameworks — the Grand Bargain's localization targets, OCHA's coordination doctrine, UNHCR's climate-displacement analysis, WFP's efficiency commitments — and then operate in ways that systematically contradict those frameworks. This is not hypocrisy in the ordinary sense. It is the predictable output of institutions whose incentive structures reward self-perpetuation over the outcomes they declare.

2.1 The Grand Bargain: A Compact Designed to Fail.

The Grand Bargain, launched at the 2016 World Humanitarian Summit, committed signatories to channel 25% of humanitarian funding directly to local and national actors by 2020 (Grand Bargain Secretariat, 2024). By 2023, that figure stood at 0.6% of first-level funding — a marginal increase from 0.5% the previous year (Development Initiatives, 2025). This is not a gap or a delayed implementation. It is a structural refusal dressed as ambition.

The mechanism is not complicated. INGOs and multilateral agencies recover 20–30% indirect cost rates on all funding they manage, including funding they pass to local partners. Genuine localisation — which would mean local organisations holding donor relationships and associated overhead — would eliminate that revenue stream. The Grand Bargain's localization agenda was designed and monitored by the same institutions whose revenue depends on its non-implementation. The result was mathematically predictable (NEAR Network, 2024).

> “While international organisations speak of empowering local actors, they are often more concerned with maintaining their position as gatekeepers of aid.”
>
> **— Research finding cited in NEAR Network (2024)**

2.2 OCHA: The Coordinator Without a Triage Doctrine.

OCHA’s Global Humanitarian Overview 2026, launched December 2025, presents a USD 33 billion appeal targeting 135 million people across 50 countries, with an immediate priority ask of USD 23 billion for the 87 million people facing life-threatening needs (OCHA, 2025a). This is a dramatic reduction from the USD 44–45 billion requested in 2025 — yet 2025’s appeal received only USD 12 billion, barely 27% of requirements and the lowest funding level in a decade (Development Initiatives, 2025). The GHO 2026's reduced headline figures reflect a deliberate "humanitarian reset" — OCHA narrowing its definition to align the appeal with what is deemed fundable, not what is needed. OCHA's coordination role, in practice, has shifted from ensuring scarce resources reach the highest-priority needs to managing the political optics of a structurally underfunded system.

Currently it is the latter. IRC's Emergency Watchlist 2025 documents that Ukraine — with functional government, substantial domestic capacity, and a European political constituency — receives funding dramatically disproportionate to humanitarian need severity relative to Sudan, DRC, and Chad (IRC, 2024). Gaza receives international attention proportional to geopolitical salience, not to assessed need. OCHA's coordination role, in practice, is to manage the optics of this politically determined allocation, not to challenge it.

> **STRATEGIC GAP — OCHA**
> OCHA's coordination architecture was designed for a world in which needs coordination was the primary challenge. With USD 23 billion needed immediately for life-threatening needs in 2026, with 2025 funding at only 27% of requirements, and with the GHO itself adopting a narrower definition of need to match available funds rather than actual suffering, the primary challenge is principled triage — a function for which OCHA has neither the doctrine nor the institutional authority. This is the single most consequential gap in the humanitarian coordination system (OCHA, 2025a; Development Initiatives, 2025; IRC, 2024).

2.3 UNHCR: Normative Expansion, Operational Retreat.

UNHCR's Global Trends 2024 documents 123.2 million people forcibly displaced at end-2024 — a near-doubling in a decade (UNHCR, 2025a). By mid-2025, that figure had declined to 117.3 million — the first meaningful decrease in over a decade, driven largely by returns in Syria, Sudan, DRC, and Afghanistan (UNHCR, 2025b). UNHCR is careful to note that many of these returns occurred under adverse conditions, to areas where insecurity persists and services are absent, raising serious questions about their sustainability. Simultaneously, UNHCR projects 136 million forcibly displaced and stateless people by end-2026 (UNHCR, 2026). Against this backdrop, UNHCR faces potential loss of direct assistance to 11.6 million refugees following the US funding suspension, while simultaneously expanding its normative framing to include climate-related movement, development displacement, and statelessness (OCHA, 2025a). The institutional response has been to expand the definitional scope of the mandate while contracting operational capacity — the classic response of an organisation whose credibility depends on relevance, but whose resources can no longer sustain delivery.

UNHCR's No Escape (2023) represents genuine analytical work on the climate-displacement nexus — the finding that 90 million displaced people live in countries with high-to-extreme climate hazard exposure is important and should inform policy. But there is a critical distinction between analytical framing and operational mandate. UNHCR's analysis of climate-displacement linkages does not translate into an UNHCR mandate to implement climate adaptation programming in acute crisis settings. The former is valuable. The latter is mandate overreach.

2.4 The INGO Response: Three Diverging Trajectories.

Among INGOs, the response to converging funding cuts and expanded mandates is producing three diverging trajectories, documented across ICVA's (2025) survey and multiple sector assessments:

- A significant cohort retreating to emergency core activities, closing country programmes, and renegotiating contracts toward emergency-only frameworks. Among organisations receiving USAID funding, 67% faced stop-work orders and 30–40% staff reductions are underway across major INGOs (ICVA, 2025). This trajectory is operationally rational but risks becoming permanent rather than transitional.
- A larger cohort attempting to preserve programme diversity through efficiency investments — anticipatory action, cash programming, technology — while renegotiating overhead structures. The institutional incentive is to maintain the full mandate footprint, including climate resilience and development work, because mandate breadth determines donor portfolio relevance and, through that, revenue.
- A smaller cohort using the crisis to restructure — transferring programme leadership to local partners, exiting delivery for technical advisory roles, and accepting the revenue reduction that genuine localisation implies. This trajectory is the most consequential and the least common.

The distribution across these trajectories — heavily weighted toward mandate defence rather than genuine transformation — reflects the fundamental misalignment between organisational incentives and humanitarian purpose that the sector has failed to resolve through self-regulation for two decades (ALNAP, 2022).

Part III
The Climate Mandate Question — The Moral and Operational Case

3. Should INGOs Be Doing Climate Resilience At All?

This is the question the sector will not ask itself. It is a question of mandate, of comparative advantage, and — most fundamentally — of moral coherence. To answer it rigorously, it is necessary to first establish two things: what climate resilience programming actually requires, and who bears the burden of the climate crisis that is being addressed.

3.1 Who Created the Crisis — and Who Pays for It.

The climate crisis was created by industrialised economies over 200 years of emissions. The populations most affected by it — the communities in the Sahel, the Horn of Africa, South Asia, and the Pacific — contributed least to its creation. Burkina Faso receives less than 1% of global climate finance despite being among the world's most climate-vulnerable nations (IDMC, 2025). Uganda hosts nearly two million refugees from climate-conflict compound crises while contributing negligibly to the carbon concentrations generating those crises (UNHCR, 2025a).

This matters for the INGO mandate question in a specific and direct way. When an INGO implements climate resilience programming in a crisis-affected community, it is — whether it acknowledges this or not — delivering a service that wealthy polluting nations should be funding as reparation and duty, not as charity brokered through an international NGO. The INGO's role in this transaction is to absorb donor overhead, deliver a programme that may or may not be appropriate to the community's actual priorities, and report back to donors in frameworks that satisfy climate finance accountability requirements.

> “The family in Renk, South Sudan, who has just watched her children go three nights without food did not choose to be the subject of a climate adaptation project. She is the subject of it because climate finance is available and humanitarian finance is not. That is not solidarity. It is budget arbitrage.”
>
> **— CASA NEXUS Policy Analysis**

3.2 The Acute Stratum: Where Climate Resilience Has No Legitimate Role

During acute emergency response — the first 72 hours to 12 weeks of a crisis — the primary humanitarian objectives are unambiguous: mortality reduction, injury treatment, WASH stabilisation, food provision, protection from violence, and shelter. Climate change is background context at this stratum, not an operational variable. A cholera response in Yemen does not benefit from climate attribution analysis. A food distribution in Jonglei State does not require a climate vulnerability assessment before vehicles move.

The insertion of climate resilience framing into acute response serves one purpose: it makes humanitarian programming dual-codeable for climate finance. Green Climate Fund grants, CREWS allocations, and bilateral climate ODA are available in volumes that traditional humanitarian funding is not. When OCHA (2024) frames anticipatory action as climate adaptation, or when UNHCR (2023) positions its emergency shelter programming as climate-resilient reconstruction, it is not improving outcomes for affected communities. It is expanding the financing envelope accessible to the same institutional actors doing the same things under a new label.

> **THE MORAL INDICTMENT.**
> Inserting climate resilience requirements into acute emergency programming imposes a burden of proof — demonstrate climate-adaptive design, integrate climate risk criteria, report against climate finance indicators — on programming aimed at people who are dying from conditions that require immediate, unconditional response. The climate conditions did not cause the acute need in isolation, and climate adaptation measures cannot address the acute need. Imposing climate framing at the acute stratum delays response, distorts targeting, and diverts programming resources toward donor compliance rather than community need (ALNAP, 2022; OCHA, 2024).

This is not a dismissal of climate change's causal role. As UNHCR (2023) documents compellingly, climate change is a threat multiplier that generates and intensifies the conditions of crisis. That causal analysis is important and should drive policy — specifically climate finance policy, emissions reduction commitments, and loss and damage mechanisms. But the appropriate response to a climate-caused crisis at the acute phase is emergency relief, not climate adaptation programming. The cause does not change the intervention. The cause changes the obligation of wealthy nations to fund the intervention unconditionally and permanently.

3.3 The Mandate Overreach in Evidence.

UNHCR's normative expansion to include climate-related displacement, OCHA's framing of anticipatory action as climate adaptation, WFP's climate-resilient food systems programming in active conflict zones — these represent a progressive blurring of the emergency mandate that ALNAP's State of the Humanitarian System 2022 documents has not improved outcomes (ALNAP, 2022). The sector is wider and more expensively staffed than at any point in its history. Its impact on durable solutions — reduction of chronic displacement, prevention of recurrent crisis, sustainable food security — has not improved proportionally.

The Grand Bargain Secretariat's (2024) own data are the evidence: after nearly a decade of nexus programming, triple nexus frameworks, and climate-humanitarian integration initiatives, direct funding to local actors stands at 0.6% and displacement has nearly doubled. The mandate expansion has served organisations. It has not served communities.

> "An INGO implementing a climate-resilient WASH project in an active conflict zone is not making a community more climate-resilient. It is making its next donor report more fundable. These are not the same thing, and conflating them costs lives."
>
> **— CASA NEXUS Policy Analysis**

3.4 When Climate Work Is Legitimate — and Who Should Do It.

The argument is not that climate resilience programming is never appropriate. It is that it is appropriate in specific contexts, at specific phases, and — crucially — by actors whose mandate and accountability structures are designed for multi-year adaptive work rather than emergency response. The sequencing is not a technicality. It is a moral and operational requirement.

Response Phase and Context	Climate Work: Legitimate Mandate, Wrong Actor, or Distortion?
Acute emergency (0–12 weeks) Active conflict, famine, epidemic	DISTORTION. No legitimate climate resilience mandate at this stratum under any circumstances. Emergency actors must respond to immediate survival needs without climate compliance requirements. (OCHA, 2024; UNHCR, 2023)
Protracted displacement without active conflict Refugee camps, protracted IDP settlements	PARTIAL LEGITIMACY — wrong actor. Climate-informed shelter, WASH, and livelihood design is appropriate. But the actor should be development-mandated (UNDP, bilateral development agencies, local government) — not emergency

Response Phase and Context	Climate Work: Legitimate Mandate, Wrong Actor, or Distortion?
	INGOs converting programmes to access climate finance. (World Bank, 2017)
Early recovery (3–18 months post-onset) Post-conflict, post-disaster reconstruction	LEGITIMATE — with conditions. Climate risk should inform reconstruction choices: shelter standards, WASH siting, livelihood design. The implementing actor should have a genuine transition mandate, not an emergency mandate extended to retain programme funding. (UNHCR, 2023; FAO et al., 2025)
Disaster Risk Reduction Non-emergency periods, community preparedness	CORE MANDATE for the right actors. Early warning systems, anticipatory action trigger design, community-level climate risk mapping. This is where climate science directly saves lives. INGOs with DRR mandates, IDMC, FAO — appropriate. Emergency-mandate INGOs maintaining DRR programmes to avoid mandate contraction — problematic. (FAO et al., 2025; IDMC, 2025)
Long-term development Stable or stabilising contexts	LEGITIMATE — but not an INGO mandate. Climate-adaptive agriculture, social protection design, migration planning, green infrastructure. These belong to national governments, bilateral development agencies, and local civil society — not to international NGOs whose expertise and accountability structures are calibrated for emergency response. (World Bank, 2017; OECD, 2019)
Policy and advocacy International climate finance negotiations	ESSENTIAL — for the right voices. Loss and damage, climate justice, NDC implementation, climate finance access for fragile states. This advocacy should be led by affected country governments and local civil society, with INGOs providing technical and amplification support — not positioning themselves as the primary voice of communities they do not represent. (NEAR Network, 2024)

THE SEQUENCING PRINCIPLE — A POLICY LINE

Climate resilience work belongs at early recovery, DRR, long-term development, and policy strata. It must be implemented by actors with appropriate mandates and multi-year accountability frameworks. Any INGO inserting climate compliance requirements into acute emergency programming should be required to demonstrate — to an independent evaluator, not to its own reporting system — that this does not delay, distort, or reduce the volume of life-saving assistance delivered. The default presumption should be that it does.

Part IV
The Post-Trump Rupture — A Catastrophic Test of a Broken System

4. What the Trumpist Defunding Has Exposed.

The Trump administration's humanitarian retrenchment — USAID's effective closure on 1 July 2025, the Rescissions Act recovering nearly USD 9 billion in committed funding, stop-work orders across 67% of INGO USAID portfolios (ICVA, 2025) — is the most significant rupture in the international humanitarian financing architecture since the system's post-WWII construction. It is not a cyclical austerity. It is ideological demolition. But the demolition has exposed foundations that the sector's own publications admit were structurally unsound.

4.1 The Critique That the Sector Will Not Own.

The Trumpist argument against the INGO complex has four distinct threads. Three of them have substantial empirical support in the sector's own data.

- Somalia, Haiti, South Sudan, and DRC — three or four decades of humanitarian investment; persistent crisis. ALNAP's (2022) State of the Humanitarian System acknowledges that durable solutions have not been achieved at scale in virtually any protracted crisis context. The humanitarian system has become structurally dependent on the persistence of need. When need resolves, the system loses revenue. That is a conflict of interest the sector has never adequately addressed.
- Development Initiatives (2025) documents that 58% of humanitarian funding flows to multilateral agencies and 23% to INGOs — institutions that collectively recover tens of billions in indirect costs. The CALP Network's (2025) evidence that eliminating intermediaries in cash programming produces measurable cost efficiency gains confirms that the overhead structure, while partially justified by accountability requirements, is also partially justified by institutional interest in its own continuation.
- The Grand Bargain Secretariat's (2024) own data — 0.6% direct to local actors after nine years of commitment — are the indictment. NEAR Network's (2024) publications name the mechanism: INGOs recover overhead on pass-through funding and therefore have a direct financial incentive to remain as intermediaries rather than facilitate genuine local ownership. International organisations have structurally displaced local civil society from funding relationships, talent, and operational leadership.
- IRC's (2024) Emergency Watchlist data read against OCHA's Financial Tracking Service confirm that funding allocation follows geopolitical salience rather than humanitarian need. Ukraine and Gaza — maximum geopolitical visibility — receive disproportionate

funding. Sudan and DRC — maximum need, minimum geopolitical salience — receive insufficient funding. OCHA's (2024) own data are the evidence for the claim, but OCHA does not make the claim.

> "Is the Trumpist critique partially correct? On dependency, overhead, local displacement, and political capture of funding — yes. The sector's own published data confirm it. On the solution — catastrophically no. Abrupt defunding does not reform a broken system. It collapses the imperfect system onto the people it was already failing most severely."
>
> **— CASA NEXUS Policy Analysis (reading across ALNAP, 2022; Development Initiatives, 2025; ICVA, 2025; NEAR Network, 2024)**

4.2 What Abrupt Defunding Actually Produces.

ICVA's Lives on the Line (2025) documents the operational reality of abrupt defunding with specificity: 80% of local organisations reported immediate downstream impacts including contract termination and stop orders; national staff lost livelihoods without the safety nets available to international personnel; programmes in progress were abandoned without transition planning; and beneficiaries were left without services in contexts where alternative providers did not exist. This is not dependency reduction — it is organised abandonment.

The World Bank's (2017) research on forced displacement provides the longer-term economic frame: the costs of unmanaged displacement — to host economies, to regional stability, to long-term development trajectories — significantly exceed the costs of the humanitarian assistance that mitigates them. The USD 23 billion immediate priority ask in OCHA's GHO 2026 is large in human terms (OCHA, 2025a). It is a fraction of the costs that inadequately managed displacement imposes on global systems through labour disruption, regional instability, public health risks transferred across borders, and political destabilisation in host countries that generates its own security costs for the donor governments that have just cut aid.

> **THE POST-TRUMP REALITY**
>
> The Trumpist defunding has not resolved the structural failures it diagnosed. It has added a new crisis — mass programme discontinuation, beneficiary abandonment, and local organisation collapse — to the existing crisis of inadequate, inequitably distributed funding. The sector cannot respond by lobbying for restoration of the status quo ante. That status quo was broken before the defunding. The challenge is to use the rupture to build the replacement architecture.

Part V

The Policy Mix — Save Lives or Shape Out

5. The Reckoning: A Policy Architecture for What Comes Next.

The sector does not lack analysis. It lacks the institutional will to act on the analysis it has already produced. Every major finding in this brief is derivable from the sector's own published evaluations — ALNAP, Development Initiatives, Grand Bargain Secretariat, ICVA, NEAR Network, UNHCR, OCHA, FAO, World Bank. The analysis has been available. The conclusions have not been drawn. The policy architecture proposed here draws them explicitly.

5.1 The Tiered Mandate Doctrine: The Non-Negotiable Starting Point.

The foundational policy requirement is a tiered mandate doctrine that defines what actors do at what phase — and enforces it through financing conditionality rather than voluntary commitment. The voluntary commitment model (the Grand Bargain, the triple nexus, the localization agenda) has produced 0.6% localisation after nine years. Enforcement through financing is the only mechanism with a credible track record.

Mandate Tier	Mandate Scope, Eligible Actors, and Financing Instrument
Tier 0 — Life-Saving Response (Acute emergency, 0–12 weeks)	Scope: Mortality reduction, emergency food, WASH stabilisation, emergency shelter, protection from violence. No climate compliance requirements. No development outcomes. No nexus framing. Eligible actors: Emergency-mandated INGOs and local organisations with demonstrated acute response capacity. UN agencies with emergency mandates (UNICEF, WFP emergency operations, UNHCR emergency response). Financing: Fully flexible, multi-year pre-positioned emergency funding. Zero earmarking. Allocated by published triage doctrine based on severity-adjusted need — not geopolitical salience.
Tier 1 — Transition and Early Recovery (3–24 months post-onset)	Scope: Reconstruction informed by climate risk, livelihood restoration, WASH consolidation, protection mainstreaming. Climate risk may be integrated where it directly reduces reconstruction vulnerability — not as a compliance requirement. Eligible actors: INGOs with explicit transition mandates; local organisations with demonstrated recovery programming capacity; UNDP; bilateral development agencies with nexus programming

Mandate Tier	Mandate Scope, Eligible Actors, and Financing Instrument
	experience. Financing: Blended humanitarian-development financing with explicit phase-out timelines. Local actor direct funding at minimum 50% of country allocations.
Tier 2 — Resilience and Risk Reduction (Non-emergency, DRR contexts)	Scope: Early warning systems, anticipatory action framework development, climate-adaptive livelihood programming, community risk mapping. Implemented only in contexts where basic security and functioning governance exist. Eligible actors: Local civil society organisations as primary implementers; INGOs as technical advisors; IDMC, FAO, climate finance specialised agencies. Financing: Climate finance instruments (Green Climate Fund, Adaptation Fund, CREWS) accessed directly by local organisations and national governments — not brokered through INGOs. INGOs may receive technical assistance funding only.
Tier 3 — Long-Term Development (Stable or stabilising contexts)	Scope: Climate-adaptive agriculture, social protection, green infrastructure, migration corridor planning, governance and institutional capacity development. Eligible actors: National governments, local development organisations, bilateral development agencies. INGOs without demonstrated long-term development comparative advantage should not be present at this tier. Financing: Development ODA, World Bank IDA, private investment. Not counted against humanitarian funding envelopes.

5.2 The Anticipatory Action Imperative: From Modality to Infrastructure.

FAO, WFP, and OCHA’s 2025 synthesis documents a USD 7 return for every USD 1 invested in anticipatory action — the highest cost-effectiveness ratio in the humanitarian portfolio (FAO et al., 2025). Anticipatory action currently constitutes less than 1% of humanitarian funding. The USD 33 billion GHO 2026 appeal and USD 23 billion immediate priority ask (OCHA, 2025a) make the investment calculus stark: at the documented 7:1 return, USD 1 billion in anticipatory action funding is the equivalent of USD 7 billion in post-shock response. The sector is choosing the expensive option, repeatedly, because organisational incentives reward emergency response scale rather than prevention (Development Initiatives, 2025).

The policy requirement is to treat anticipatory action as essential infrastructure — equivalent to emergency stockpiling — rather than as a programming modality competing for marginal allocations. A dedicated global anticipatory action facility, capitalised at USD 3–5 billion annually through pre-committed donor contributions linked to IDMC's and OCHA's risk frameworks, would enable pre-arranged financing for the top 50 conflict-climate risk contexts before crises unfold. Development Initiatives' (2025) recommendation to scale from under 1% to at least 5% of humanitarian funding is the conservative floor, not the ceiling.

ANTICIPATORY ACTION — THE POLICY CASE.

Every USD 1 invested in anticipatory action before a crisis saves USD 7 in emergency response costs (FAO et al., 2025). Bangladesh anticipatory assistance reached 500,000 people within five days of a flood warning at half the cost of post-shock response. The IRC's Nigeria pilot demonstrated superior household welfare outcomes for anticipatory cash recipients versus post-shock recipients. The evidence is unambiguous. The only reason anticipatory action remains marginal is that the organisations managing emergency response funding have no institutional incentive to reduce the scale of emergency response. Anticipatory action reduces demand for emergency services. It does not reduce demand for the capacity of organisations that build and manage those services. That is the structural barrier to scaling it.

5.3 The Localisation Imperative: Enforce or Abandon the Commitment.

The Grand Bargain's localisation commitment has been voluntarily failed for nine years (Grand Bargain Secretariat, 2024). The NEAR Network's (2024) analysis establishes why: the actors responsible for implementing localisation are the same actors whose revenue depends on its non-implementation. The policy response is to remove the implementation responsibility from those actors and enforce localisation through direct financing conditionality.

The specific policy requirements are: country-based pooled funds must direct a minimum of 60% of allocations directly to local and national organisations by 2028, increasing to 75% by 2030; INGOs accessing pooled fund resources must compete as technical service providers rather than primary implementers; overhead recovery on pass-through funding to local actors must be capped at 8% — the administrative cost of grant management, not the full INGO indirect cost rate; and all localisation progress must be independently verified by actors outside the Grand Bargain signatory community before donor reporting credit is granted.

5.4 The Test: Save Lives or Shape Out.

The culminating policy requirement is a mandate fitness test for every INGO operating in the humanitarian space. In the post-Trump resource environment, the question is not ‘should INGOs exist?’ It is ‘which INGO functions are genuinely irreplaceable, which are locally replicable with investment, and what transition architecture protects populations during the transfer?’ Every INGO must answer three questions with independently verified evidence:

- Can you demonstrate, with comparison group evidence or independently verified outcome data, that your acute response programming reduces mortality and morbidity outcomes that would not otherwise be achieved by local actors with equivalent resources? If yes, your acute response mandate is justified. If not, you are delivering a service that can and should be delivered by others.

- Are you genuinely transferring capacity — decision-making authority, donor relationships, technical expertise, institutional accountability — to local organisations? Or are you sub-granting to local partners while retaining control over strategy, reporting, and the donor relationship? The former is a legitimate transition function. The latter is localisation as performance.
- Have you built and activated a credible, time-bound exit plan for each programme and each country operation, with successor organisations and transition support identified? Or are you indefinitely extending programme timelines because exit threatens organisational revenue? The humanitarian system does not need organisations that cannot exit. It needs organisations that build the conditions for their own irrelevance.

> "The INGO industrial complex was built to serve a purpose. That purpose is saving lives and building the conditions for communities to no longer need emergency assistance. An INGO that cannot demonstrate progress toward making itself unnecessary in any given context is not serving that purpose. It is serving itself."
>
> **— CASA NEXUS Policy Analysis**

Part VI
Conclusion-The Reckoning Is Here.

The convergence of armed conflict, climate-driven displacement, and the most severe humanitarian funding contraction in modern history has created a compounding polycrisis. OCHA's GHO 2026 identifies 239 million people in humanitarian need — a figure explicitly narrowed by methodology change to align with available funding, masking actual need that is higher and worsening (OCHA, 2025a; NRC, 2025). IDMC's GRID 2025 records 83.4 million people in internal displacement at end-2024 — a record high (IDMC, 2025). Two simultaneous famines unfolded in 2025 for the first time in recorded history. The system built to respond to that crisis has expanded its mandate beyond its capacity, created institutional incentive structures that reward self-perpetuation over impact, and allowed climate finance competition to distort the sequencing and targeting of emergency response. The Trumpist rupture has exposed these failures by removing the funding that was concealing them.

The findings of this brief are direct. The strategies of major humanitarian actors — as documented in their own publications — are calibrated to organisational survival rather than community outcomes (ALNAP, 2022; Development Initiatives, 2025; Grand Bargain Secretariat, 2024). The climate resilience mandate being applied to communities in acute crisis is morally incoherent — those communities did not cause the climate crisis and cannot be asked to 'adapt' to it while fighting disease, famine, and violence simultaneously. The anticipatory action evidence is clear and the sector's failure to scale it is a structural choice, not an evidence gap (FAO et al., 2025). The localisation commitment is nine years old, has produced 0.6% direct funding, and will not improve through voluntary compliance (NEAR Network, 2024). And the Trumpist defunding, valid in its diagnosis of dependency, overhead, and political capture, is catastrophic in its solution — abandonment of the most vulnerable as punishment for the failures of the most powerful (ICVA, 2025).

The policy architecture proposed here — tiered mandate doctrine enforced through financing conditionality, anticipatory action scaled to core infrastructure, localisation enforced rather than aspirational, and a mandate fitness test for every INGO — is derivable from the sector's own published evidence. It does not require new knowledge. It requires institutional honesty and political will.

The humanitarian imperative — saving lives, alleviating suffering, preserving dignity — is not in dispute. What is in dispute is whether the current institutional architecture serves that imperative or has gradually subordinated it to the imperative of institutional survival. The populations of Sudan, South Sudan, DRC, Myanmar, Somalia, and the dozens of forgotten crises cannot afford a decade of institutional self-preservation dressed as reform. The reckoning is here. The choice — save lives or shape out — cannot be deferred.

POLICY SUMMARY — THE FIVE REQUIREMENTS

Enforce a four-tier mandate framework through financing conditionality — not voluntary commitment. No climate compliance requirements at the acute emergency stratum. Full stop.

Scale from <1% to 5% minimum of humanitarian funding by 2026 through pre-committed donor contributions. Treat anticipatory action as essential infrastructure, not a competitive programming modality. (FAO et al., 2025; Development Initiatives, 2025)

Country-based pooled funds to direct 60% directly to local actors by 2028, rising to 75% by 2030. INGO overhead on pass-through capped at 8%. Independent verification required. (NEAR Network, 2024; Grand Bargain Secretariat, 2024)

OCHA to develop and publish a transparent global triage doctrine based on severity-adjusted need — removing the current de facto triage by media attention and geopolitical proximity. The GHO 2026's own adoption of a narrower needs definition to match available funding confirms that triage is already happening; the question is whether it is principled and transparent. (OCHA, 2025a; IRC, 2024)

Every INGO to pass independently verified Save Lives, Shape, and Shape Out tests as conditions of continued access to pooled and bilateral humanitarian financing. Organisations that cannot pass the test should be assisted to exit responsibly — not funded indefinitely.

References

ALNAP. (2022). State of the humanitarian system 2022. ALNAP/ODI. https://www.alnap.org/sohs

CALP Network. (2025). Cost-effectiveness in humanitarian work: Cash-based programming. CALP Network. https://www.calpnetwork.org

Development Initiatives. (2025). Global humanitarian assistance report 2025. Development Initiatives. https://www.devinit.org/resources/global-humanitarian-assistance-report-2025

FAO, WFP, & OCHA. (2025). Saving lives, time and money: Evidence from anticipatory action. Food and Agriculture Organization of the United Nations. https://www.fao.org/publications/anticipatory-action

FAO, IFAD, UNICEF, WFP, & WHO. (2024). The state of food security and nutrition in the world 2024. FAO. https://doi.org/10.4060/cd1254en

Grand Bargain Secretariat. (2024). Grand Bargain annual report 2024. Inter-Agency Standing Committee. https://www.interagencystandingcommittee.org/grand-bargain

ICVA. (2025). Lives on the line: The human impact of US foreign aid shifts. International Council of Voluntary Agencies. https://www.icvanetwork.org

IDMC. (2025). Global report on internal displacement 2025. Internal Displacement Monitoring Centre. https://www.internal-displacement.org/global-report/grid2025

IRC. (2024). Emergency watchlist 2025. International Rescue Committee. https://www.rescue.org/report/2025-emergency-watchlist

MSF. (2023). Access at risk: Humanitarian space and the peace-security nexus. Médecins Sans Frontières. https://www.msf.org/access-risk

NEAR Network. (2024). Shifting the power: NEAR Network localization progress report. NEAR Network. https://www.near.ngo

NRC. (2025, December 8). 2026: Millions in need will not get aid unless global solidarity revived. Norwegian Refugee Council. https://www.nrc.no/news/2025/december/2026-millions-in-need

OCHA. (2024). Global humanitarian overview 2025. United Nations Office for the Coordination of Humanitarian Affairs. https://www.unocha.org/publications/report/world/global-humanitarian-overview-2025

OCHA. (2025a). Global humanitarian overview 2026. United Nations Office for the Coordination of Humanitarian Affairs. https://www.unocha.org/publications/report/world/global-humanitarian-overview-2026-enesfr

OCHA. (2025b). Anticipatory action: Smart, fast and cost-effective humanitarian assistance. United Nations Office for the Coordination of Humanitarian Affairs. https://www.unocha.org/anticipatory-action

ODI/HPG. (2023). Nexus in practice: Evidence from field settings. Overseas Development Institute, Humanitarian Policy Group. https://odi.org/en/publications/nexus-in-practice

OECD. (2019). Recommendation on the humanitarian-development-peace nexus. OECD Publishing. https://doi.org/10.1787/e5162c65-en

UNHCR. (2023). No escape: On the frontlines of climate change, conflict and forced displacement. United Nations High Commissioner for Refugees. https://www.unhcr.org/no-escape

UNHCR. (2025a). Global trends: Forced displacement in 2024. United Nations High Commissioner for Refugees. https://www.unhcr.org/global-trends

UNHCR. (2025b). Mid-year trends 2025. United Nations High Commissioner for Refugees. https://www.unhcr.org/publications/mid-year-trends

UNHCR. (2026). Global appeal 2026. United Nations High Commissioner for Refugees. https://www.unhcr.org/publications/global-appeal-2026

World Bank. (2017). Forcibly displaced: Toward a development approach supporting refugees, the internally displaced, and their hosts. World Bank Group. https://doi.org/10.1596/978-1-4648-0938-5