Who Delivers Humanitarian Aid When Europe Cannot?

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According to OECD figures, international humanitarian aid from official donors dropped by an estimated 9.6% in 2024, amounting to $24.2 billion (≈ €22-23 billion) for first time in six years. That same year, the European Commission's initial humanitarian allocation reached just over €1.8 billion.

Taken together, these funding levels were woefully inadequate compared with the nearly 300 million people estimated to need humanitarian assistance in 2024, a gap that helps explain why NGOs report mounting constraints and struggles to keep pace with war-driven displacements or migration pressures.

Compounding these funding shortfalls, NGOs face an increasingly restrictive compliance and regulatory environment. Expanded anti-money-laundering and counter-terrorism requirements, rising insurance premiums, and tightening administrative controls make operations slower, riskier, and more expensive, shaping not just how aid is delivered but whether missions are feasible at all.

As professional organisations interventions contract under the combined weight of financial cuts and regulatory constraints, citizens and informal volunteer networks are stepping in to fill critical gaps. Their actions reflect urgency and solidarity, but they also reveal a deeper structural shift: a transfer of operational and legal risk from institutions to individuals acting without institutional protection.

This raises a stark question: can Europe's humanitarian model survive current financial and regulatory pressures while still protecting lives and upholding its values?

Since 2018, the EU and its Member States have significantly tightened anti-money-laundering (AML) and counterterrorism (CTF) rules, creating an additional layer of challenges for the nonprofit sector. The Financial Action Task Force (FATF), the global standard-setter on AML/CTF, continues to classify NGOs as relatively high-risk clients. This perception drives banks to "de-risking", a practice in which financial institutions terminate or restrict client relationships to avoid risk rather than manage it, often leaving NGOs without access to essential banking services.

These dynamics have made humanitarian operations slower, more expensive, and in some cases, unsustainable, particularly for smaller organisations since funds can be stuck in banking limbo for months, local partners can lose access to financial services entirely, and organisations are sometimes forced into costly workarounds or informal cash channels that increase security and compliance risks.

NGOs also navigate a fragmented regulatory landscape of overlapping EU directives, national laws, and local administrative requirements that generate legal uncertainty and procedural delays. In Greece, organisations operating in refugee camps must register in state-controlled registries, submit extensive documentation, and renew permits frequently, obligations many smaller NGOs struggle to meet. Similar frameworks have been introduced or tightened in Hungary, Italy, and Poland, often justified on security or transparency grounds.

Administrative oversight increasingly intersects with criminal law. Policies restricting facilitation of irregular migration are sometimes applied to humanitarian activities, affecting how transport, shelter, and search-and-rescue operations can be conducted. Even without prosecutions, the risk of investigation, fines, or asset seizure deters action. Italy's Law 15/2023, governing NGO rescue vessels, exemplifies this trend, which human rights organisations describe as the "criminalisation of solidarity".

Compliance is no longer merely procedural, it has become a tool of control that systematically discourages humanitarian presence where needs are most acute.

In 2024, EU Official Development Assistance (ODA) as a share of GNI fell to 0.47%, down from 0.53% the year before, shrinking the resources available to respond to escalating humanitarian crises, with seven EU Member States, including Germany, France, the Netherlands and Sweden, announcing plans to implement further reductions in the subsequent years. Nonetheless, their cuts would risk undermining European NGO's long-term stability, resilience, and multilateral credibility, as they collectively account for roughly 75% of global ODA.

Compounding these shortfalls, operational costs are rising sharply. Logistics, transport, staff retention, and high-risk insurances have become increasingly expensive. In December 2024, Médecins Sans Frontières (MSF) suspended its Geo Barents search-and-rescue (SAR) vessel after sustained insurance, legal, and logistical challenges made the mission unfeasible. MSF relaunched SAR operations in 2025 with a smaller, less costly vessel with lower insurance requirements and reduced exposure to regulatory risks, underscoring how combined regulatory and financial barriers force organisations to redesign missions at significant operational costs.

These financial constraints do not simply stretch budgets; they determine which missions are feasible, shape the scale of aid delivery, and shift operational risk from institutions to individuals. Across crises in Ukraine, Gaza, and Sudan, these constraints slow timely responses leaving NGOs unable to deliver life-saving aid.

As regulatory, administrative, and financial pressures constrain professional humanitarian actors, now informal volunteer accounts for roughly 25.0% of participation, more than double of formal, organisation-based volunteering (11.7%). This shift signals a EU's growing reliance on community-led networks to sustain humanitarian response, particularly in migration, border, and emergency contexts where institutional actors have scaled back or withdrawn.

For instance, groups like Samos Volunteers, a grassroots collective operating on the Greek island of Samos, have provided continuous support since the European refugee crisis began, offering psychosocial assistance, educational programming, and basic services in overcrowded camps, long after initial NGO engagement.

While this mobilisations reflects solidarity and civic resilience, it also exposes a structural vulnerability in Europe's humanitarian model. Volunteers increasingly perform functions once carried out by trained professionals, often without insurance, legal backing, or safeguarding frameworks. In politically sensitive settings, particularly those linked to migration control, individuals face heightened risks of investigation, fines, equipment seizure, or criminal liability, even when acting in life-saving capacities.

What emerges is not a temporary stopgap but a redistribution of responsibility: operational and legal risk shifts from institutions to individuals, allowing states to preserve humanitarian coverage while limiting financial and political exposure. Over time, this informalisation risks producing a fragile, uneven system, one that relies on goodwill rather than durable, rights-based humanitarian access.

Europe's humanitarian system can only be rebalanced by restoring legal certainty, operational stability, and protection for civic engagement.

The EU should adopt a legal shield for humanitarian action, explicitly safeguarding formal NGOs activities, from being criminalised as facilitation of irregular migration or flagged under financial compliance rules. It would require Member States to embed these protections into national law and provide clear EU-level guidance to prosecutors, border authorities, and financial institutions to prevent misuse of anti-smuggling or AML rules against NGOs.

By removing ambiguity, the framework would prevent over-enforcement, safeguard NGOs and volunteers, and secure humanitarian action as a legitimate public duty.

Operational constraints and rising insurance costs could be addressed through the establishment of an EU humanitarian risk facility; a publicly backed insurance and reinsurance mechanism covering high-risk humanitarian operations, including maritime search-and-rescue, missions in conflict zones, and legal liability for transport or shelter provision.

By absorbing extreme-risk exposure that private insurers are unwilling to cover, the pool would allow NGOs to maintain essential missions without redesigning operations to reduce financial or regulatory risk. Jointly funded by the EU, Member States, and capped NGO contributions, this approach would convert operational uncertainty into a manageable, shared system. Flexible rapid-response cash windows could be embedded to cover immediate operational needs, reducing reliance on informal channels.

The EU should formalise civic solidarity through a humanitarian reserve corps, a standing pool of trained civilians deployable during crises to reinforce professional NGOs. Members would receive training in legal basics, safeguarding, logistics, and humanitarian principles, while enjoying insurance, legal protection, and clear operational mandates.

Activated only during major emergencies, the Corps would supplement, not replace, professional actors, ensuring that volunteering remains a structured, supported contribution rather than a risky substitution for institutional capacity.

Finally, Europe must implement a transparent Humanitarian Access and Risk Monitoring System. Member States would report blocked operations, NGO operational constraints, insurance gaps, and volunteer legal risks on a quarterly basis. This system would track whether legal, financial, and operational safeguards are effectively applied, allowing the EU to adjust policy

in real time and hold governments accountable for “de-risking” practices that undermine humanitarian capacity.

Together, these initiatives would restore Europe’s credibility, reduce the over-reliance on volunteers in legal grey zones, and create a more resilient, rights-based humanitarian system.

Europe’s humanitarian values are not eroding because of indifference, but because the systems meant to uphold them have become risk-averse, fragmented, and financially brittle. As compliance burdens, funding gaps, and legal uncertainty constrain professional organisations, the burden of response is quietly shifting onto citizens acting without protection, predictability, or accountability. This is neither sustainable nor fair.

Rebalancing Europe’s humanitarian effort is therefore not about weakening safeguards, but about restoring proportionality, flexibility, and trust in those delivering aid. Without targeted reforms, Europe risks normalising a model in which life-saving assistance depends on individual courage rather than institutional capacity.

A humanitarian system that survives only because its citizens break rules to save lives is not resilient, it is failing by design.

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