

PLATFORMA observations on the background note for the CSOs and LAs thematic programme (2014-2020)

General remarks on the overall approach

- A **consultation process** is underway for local and regional governments, which outcomes expected for December 2012 should impact the programme's strategy. Therefore, we would like the detailed timeline for the strategy's approval to be clarified.
- PLATFORMA represents 24 partner organisations of local and regional governments, which have demonstrated interest in contributing to this consultation on the CSO-LA thematic programme. UCLG, CPMR, CUF, AFCCRE and the cities of Paris and Lyon have contributed to this draft note. However, **quality work requires time and proper mechanisms**. A window of opportunity of about 2 weeks in total is not appropriate enough for a consultation with networks.
- An indication of the **budget share** allocated to CSOs and to LRAs would be helpful at this point, with a confirmation that **2 distinct lines** are foreseen for each type of actors. Regarding funding, further observations are made throughout the document. For instance, we would like to have a clarification regarding the budget line dedicated to the priority 1.3 "territorial approach to development".
- Following the adoption of the "Agenda for change", clarification would be necessary regarding **the application of the differentiation principle in this thematic programme**. We call on the EC to ensure that LRA from countries no longer recipient of EU bilateral aid be eligible to the CSO-LA thematic programme.
- We call on the EC **to enlarge the list of eligible countries** to the first objective focusing on country level, in comparison with the last programming period. Eligible countries for LAs should be as numerous as the ones eligible for CSOs.
- As proposed in the CSO communication, **country roadmaps** should be established by EU delegations for LRAs. Following the results of the structured dialogue, we could even imagine the development of joint country roadmaps for CSOs and LAs.
- We request that, in the EU partner countries, **all levels of governance** (particularly LRAs and their representative associations) be consulted by the EU delegations during the programming stage, as the European Parliament put forward in its negotiating position on the proposal for a regulation establishing a financing instrument for development cooperation (title IV, article 11, 3).
- PLATFORMA reiterates the need for **an evaluation of the NSA-LA programme** in order to identify the strengths and weaknesses of the programme. A better visibility of the financed projects would benefit to all the potential applicants.
- The EC should maintain the publication of calls for proposals forecasts.

Comments on the introduction and proposed components

1- Background

- Two crucial references should be added in the background: first of all, the **Millennium Development Goals framework**, among which the objectives of poverty reduction, gender equality, environment protection and global partnership should be guiding principles for the EU thematic programmes as a whole. Furthermore, the **Busan Global Partnership for Effective Development Cooperation** should also be a strong component of the programme's background, with consequences in the programme's organisation (see observation on challenges and on the component 1 of the programme in particular).

2- Challenges

- In line with the Busan Partnership for Effective Development Cooperation, the second challenge should be reworded as follows: "challenges for CSOs and LRAs to effectively contribute to **democratic ownership** and governance and to **accountability to each other**"
- The third challenge should be reworded as follows : « limited access by populations to **basic public services**”

3- Proposed components

- **We welcome the articulation of the programme around 3 components**, which we consider relevant regarding the contribution of CSOs and LRAs to development.
- In particular, we would like to stress our support for the following items (details provided in corresponding sections):
 - Welcome innovation with component 1 focussing on the country level and foreseeing **pilot actions promoting a territorial approach to development**;
 - Significant priority set on **development education**, a major challenge for the upcoming budget period, with opening of this component to middle-income countries;
 - Distinction between support to development processes at country level in component 1 and support to structuring partner country networks included in component 2

4- Guiding principles

- We urge the Commission to adapt some of the proposed principles as follows:
 - "Considering CSOs' right of initiative" into "Considering CSOs' right of initiative and **LRAs' democratic legitimacy in countries where they are elected**"
 - "strategic engagement with CSOs" into "**strategic engagement with CSOs and LRAs from both Europe and partner countries** "
- We would like the Commission **to encourage a partnership and reciprocal approach between LRAs and CSOs** for all the proposed objectives.

- We would also like to add a specific principle regarding the need to consider the **diversity of LRAs** as actors given the various states of decentralisation in partner countries
- The principle of **flexible funding** is fundamental. However, further indication on how to make funding flexible is required. As relevant as what you do is how you do it. In this regard, we believe that the implementation should move beyond the project approach and seek to establish **medium term strategic partnerships with all relevant actors involved**.

Remarks on Component 1 “Focus on country level: enhancing CSOs and LAs contribution to development and governance processes

1.1 To enhance CSOs’ contribution in development processes

- CSOs capacity in engaging in public policy processes: we suggest that the programme supports CSO contribution in policy making not only at the national and sector level, but also at the **sub-national level**.
- Based on the Communication on Europe's engagement with Civil Society in external relations, we would like the EC to recall here that **“ensuring effective provision of social services - including health, education and social protection - is the responsibility of governments, whether on central or local level, depending on the institutional framework of the country”**, as stated in point 4.3. Supporting CSOs’ role for improved social service delivery therefore needs clarifying. According to the note, the programme foresees supporting this role in least developed countries and in fragile States, with **no mention of public authorities responsible for service delivery** at all. Such a truncated vision would be a shortcoming in the programme’s design.
 CSOs may play a significant role in service delivery in particular contexts where public authorities, including local governments, are deficient or not able to operate efficiently. However, **for the sake of good governance and sustainability**, such experiences should remain exceptional and **cannot be promoted as a guiding principle for this thematic programme**.
 There would be a **risk of weakening already weak public institutions** such as local governments responsible for basic service delivery in many countries. Rather than promoting CSOs’ role as service providers, we call on the EC **to support LRAs in fulfilling their responsibility in a medium/long term perspective, including in partnership with CSOs**. Only in these conditions can service delivery contribute to **State building and improved local governance**. In particular situations where CSOs are to contribute to service delivery, their action should aim to support/train public authorities and to hold them accountable in the end.
- PLATFORMA reiterates that all CSO-LA calls for proposals should include a partnership and reciprocal approach between LRAs and CSOs. Too often, calls for proposals launched by EU delegations within the budget-line for Non State Actors, were closed to LRA as partners. **We therefore call on the EC to make LAs eligible as partners in all calls for proposals**.

1.2 To enhance LRAs’ contribution in development processes

- In terms of the enabling environment for LRAs, stronger emphasis should be made on **decentralisation reforms** and **LRAs capacity for self-government**. However, the focus on the enabling environment seems rather ambitious for the scope of this thematic programme. We believe such a global objective rather applies to **geographic programmes**.
In the framework of this programme, an analytical work could be conducted with the LRAs associations to set priorities on countries where decentralisation processes are weak, blocked or even declining, or where the participation of LRAs to national budget is very low (below 10%, hence limiting their operational resources).
- Rather than focusing on the support to LRAs for the development of an enabling environment, we would like to highlight **LRAs' role in service delivery** (1.2.2).

Based on some of the axis of the 1.2.1 priority, we would also like to recall LRAs crucial role **in operating democracy at the local level** a crucial principle not explicitly included in the note.

- We also would like to **divide support to pro-poor service delivery and inclusive and sustainable growth into two different sub-priorities**. There is indeed a risk that specific calls for proposals launched by the EC delegations will narrow the scope of the cooperation and focus only on one of these two issues. Both topics should be addressed separately for each call for proposals.
- Furthermore, examining the roles and added values of both CSOs and LRAs are relevant in the case of **fragile States** and therefore this should be addressed in the section 1.2 as well.
- In terms of the "how", the note should explicitly make reference to "**decentralised cooperation**", given that it is a key instrumental mechanism for LRAs to share expertise, transfer knowledge, build capacities etc (great experiences of North/South and South/South cooperations).
- Therefore, the programme should **focus on capacity building and transfer of expertise both through decentralised cooperation partnerships and support to national associations**, which have a strong advocacy and oversight role to play and also offer an **important multiplier effect** for a modest programme like the CSO-LA programme.
- We suggest that the programme recognizes and supports the role that **European LRAs** play in support of their counterparts in partner countries but also in support of CSO in partner and European countries, as well as in the advocacy and awareness raising area.
- As mentioned earlier, **country roadmaps** should also be established by EU delegations for LRAs. A joint country roadmap for CSOs and LAs would provide an efficient reply to the results of the structured dialogue.
- In terms of delivering public services and promoting inclusive and sustainable growth, we suggest that stronger reference is made to poverty reduction and fight against social exclusion.
- In addition, it would be key that the programme strengthens the capacity of LRAs in implementing and monitoring the development effectiveness agenda

1.3 To support pilot actions promoting a territorial approach to development

- A response to one of the structured dialogue's recommendations, **this innovation is a strength** of the proposed programme.
- In various sections of the note, stronger contribution to and articulation between national and local policy-making is pointed as a major challenge for the programme. We believe that this sub-component could provide great **opportunities for CSOs and LRAs to join forces in this regard and reinforce their partnerships for the benefit of the local level (territory)**.
- **Existing successful experiences** could be promoted to demonstrate the impact of such partnerships.
- The **role of each category of actors** should be respected, including the leading and **coordination role of LRAs** as legitimate public institutions in multi-actor development plans, should be made clear in this sub-component. Pilot actions should contribute to reinforcing local public institutions, increasing local actors' participation in local policies and improving LRAs' accountability to citizens and CSOs.
- The framework for pilot actions should be established carefully and **put forward concrete expected results**. Experience has proved that these types of "participatory development plans" supported by donors should be well-anchored in the territory and respond to clearly identified needs jointly put forward by the actors involved. Furthermore, when possible, the State should be supportive of this kind of initiatives so as to ensure good articulation between local and national policies. All development actors involved in the given territory, like European LRAs for instance, should also be involved in the initiative to avoid duplication.
- In terms of budget allocations and scope of activities, what complementarity and distinction are foreseen with sub-components 1.1 and 1.2? As mentioned before we urge the EC to make both CSO and LRA to be eligible for all sub-priorities 1.1., 1.2 and 1.3.

Remarks on component 2: strengthening CSO and LA networks in the field of development at regional, EU and global level

- English and French versions of the note differ on this component. LRAs networks are missing in some parts of this component. We urge the Commission to make corrections and **circulate the right version in both languages** so that comments are made properly.
- We are proposing the following modifications:
 - Quoted issues of cooperation: health, trade, human rights, migration, global justice, climate change, **food safety**, aid effectiveness.
 - In this regard, European CSOs **and European LAs** can play an important role in promoting networking and coordination at different levels and in linking their local partners to global networks and to global policy debates.
 - Strengthened CSO **and LA** coordination at regional and global level
 - The programme will also seek to strengthen European CSO **and European LA** platforms, including their capacity to build transnational alliances, to coordinate and collaborate, and to actively engage in advocacy and contribute to EU development policy processes.

- In terms of supporting LRAs networks, the programme should aim to grant **multiannual institutional programmes** in order to reinforce the networks' representativeness, capacities and advocacy.
- We believe important to support actions aiming to **contribute to the EU development agenda**, and cooperation between CSOs and LAs.
- While we believe important to support networks at regional, EU and global level, and in light of our comment above on the important support to European actors, **clarification on the budget allocation** would be necessary given that the ambition is higher than in the former NSA-LA programme with roughly an unchanging budget allocation.

Remarks on component 3: development education and awareness raising

- Opening up to DEAR actions in partner countries is positive and we can imagine triangular initiatives (for example, 2 LRA in Europe + 1 LRA from partner countries) **provided that eligibility criteria are not too restrictive.**
- Development education is a major challenge for the future EU development policy.
- The programme should also support the capacity building per se and **networking of LRA in the field of DEAR.**