

CONCORD COMMENTS ON THE WORKING DOCUMENT ON THE MULTIANNUAL ACTION PROGRAMME FOR 2015 PART II, 2016 AND 2017 OF THE THEMATIC PROGRAMME "CIVIL SOCIETY ORGANISATIONS AND LOCAL AUTHORITIES"

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CONCORD welcomes the European Commission's release of this working document and the initiative it represents to consult PFD stakeholders on the new CSO-LA Programme and intensify the dialogue throughout the EC programming process. This approach puts into practice the intention to create "a meaningful and structured participation of CSOs in domestic policies of partner countries, in the EU programming cycle and in international processes" (see Communication 'The Roots of Democracy and Sustainable Development: Europe's Engagement with Civil Society in External Relations', 2012).

CONCORD's ambition, following the structured dialogue outcomes, is to be able to contribute together with all other relevant development actors in the identification and programming of actions implemented under the 2014-2020 MFF, in an attempt to create a robust partnership between the European Commission, CSOs and other relevant stakeholders. This partnership will be based on a common evaluation of needs; joint definition of strategic goals and opportunities for innovation and mechanisms to monitor and evaluate effectiveness of each intervention.

CONCORD takes this opportunity to express its willingness for an intensified dialogue with the EC and reiterates the call for a more in-depth reflection on the changing role of European CSOs in EU development cooperation in order to strengthen the key partnership between European civil society and the European Commission.

The following recommendations result from the analysis of the working document on the MAAP for 2015 Part II, 2016 and 2017 of the Thematic Programme "Civil Society Organisations and Local Authorities" recently presented by the European Commission. Recommendations likewise follow a series of previous consultations on the new CSO-LA Programme organised in early February 2014 during the Strategic dialogue, in June 2014 before the publication of the CSO-LA MIP and in October, after the publication of the 2014 CSO-LA AAP.

Long term planning and predictability of funds are strong points in favour of counting on only one Multi annual Action Programme (add to the fact that an increase of 22% of the budget 2014-2020 compared to 2007-2013 allows to improve the planning and the impact). Truly, an unallocated reserve of the budget would allow facing unforeseen priorities or events. In this context, the Mid-term Evaluation in 2017 is more important than in the previous Financial Frame 2007-2013, since it will orient a new MAAP of three more years. A strong emphasis on this evaluation should be underlined from the very beginning of this process.

Aid modalities and selection procedures

The discussions on delivery mechanisms, namely a range of different aid modalities and selection procedures that are best suited to address CSOs' and LAs' needs, were already at the core of the structured dialogue. During the debates the feasibility of each aid support model was explored in light of any potential constraints imposed by the EC legal framework and the appropriateness of the delivery mechanism to effectively address different actors' needs.

The CSO-LA MAAP 2015-2017 takes on board the conclusions of the structured dialogue and refers to aid modalities that best respond to the widest possible range of actors, needs and country contexts. However, the working document doesn't yet provide enough information to enable an in-depth evaluation of the modalities proposed and therefore accurate reflection on their effectiveness, compliance with principles of transparency, right of initiative and equal access for all actors. It clearly establishes call for proposals as the default award mechanism, limiting the space to introduce other aid modalities like follow-up grants or pooled funds. Using a proper mix, especially at the delegation level, could also help to improve efficiency; in addition to combining years or programmes.

Under priority 1, the MAAP working document states that calls for proposals will remain the default award mechanism, and that it is likely that budgets for consecutive years will be merged into one call for proposals. However, the table outlining indicative allocations is only organized per region. In order to gain the most benefits of a MAAP for the EC and CSOs alike, a breakdown per country and year would be highly welcome.

Also, the working document refers to the possibility of awarding of grants without a call for proposals. While this is already used, especially in fragile states, CONCORD would encourage the EC to identify clear and transparent criteria on the selection process of the recipient organisations. CONCORD would also encourage the EC to provide more information on the number of direct grants which will be awarded.

CONCORD would welcome further detail regarding Action Documents I and II under Priority 1. The short description of this objective significantly narrows down the role CSOs may have in country operations. For example, while we welcome the objective of going 'beyond the traditional model of CSOs as pure service deliverers', as expressed in the CSO-LA MIP, and commend the role CSOs can have in contributing to governance and accountability, we consider essential that the MAAP also foresees CSOs as partners for pro-poor social services. Not doing so would undermine the 'strong political commitment at the EU level' to support CSOs in their full potential as development actors. The importance of keeping at least some share of the programme dedicated to the provision of social services is well justified in the above-mentioned EC Communication on engaging with civil society and has been also confirmed in the 2014 CSO-LA AAP.

Under priority 2 of the programme, the working document mentions the adoption of Framework Partnership Agreements in the framework of cooperation with CSOs' regional and global organisations. An appropriate balance among geographic regions and types of actors will be sought, allowing different categories of Civil Society Organisations to be supported. Nevertheless, the MAAP only mentions that the use of FPAs under priority 2 will be rolled out to also include CSO networks, but it does not clarify what distinguishes working based on FPAs compared to other types of grant agreements, in terms of effectiveness, transparency etc. The MAAP is not specific on what kind of participatory process the EC will use to involve CSOs in their design. It is implied that FPAs will be signed after the 2014/2015 call for proposals, but questions remain as to how the call for proposals and guidelines will be adjusted to allow for this, in terms of shift of focus from a project design approach to the identification of FPA longer term

strategic objectives.

In the case of the global and regional associations of LAs, a direct award mechanism is used since there is a de facto monopoly situation. CONCORD encourages the EC to employ the FPA mechanism with CSO networks bearing in mind the risk pointed out in the technical sheet 3 of the structured dialogue that using framework partnerships may contribute to concentrating funding to a limited number of CSOs. This mechanism should be used taking steps to maintain the flexibility necessary when supporting civil society networks.

CONCORD is willing to participate in further discussions and is currently developing suggestions about FPAs, on the basis of the reflections already made during the strategic dialogue process. CONCORD is also aware of the ongoing discussions of the EC on the use of FPAs for the purpose of re-granting within priority 1 of the CSO-LA programme. We are at the EC's disposal for any dialogue on this issue, and will submit separate observations on this to the EC.

Synergies with the CSO Roadmaps

The CSO-LA MIP and 2014 AAP mentioned the CSO Roadmaps as tools for the EU to support a more strategic and transparent EU approach to engaging with CSOs, and referred to them as an instrument to be applied and developed in the framework of the CSO-LA programme.

Based on previous observations and an analysis of the Roadmap processes recently finalised, CONCORD offers its availability to discuss this process in detail and asks for a more structured participation in its future development. If there is a need for support at delegation level on the operationalization of the CSO Roadmaps, CONCORD would be available to contribute to this alongside other stakeholders including regional and national CSOs.

Integration of basic principles and cross-cutting issues

The working document, being only a summary of the CSO-LA MAAP Programme, does not include detailed information on how principles of non-discrimination, human rights, rule of law, good governance, gender equality, women's empowerment and mainstreaming environment will be addressed by the Programme. In light of the importance of these issues, CONCORD encourages guidelines on the integration of basic principles and cross-cutting issues in the CSO-LA Programme to be included in the annexes to the MAAP. CONCORD would like to see the MAAP to be clearer on how compliance with these principles will be ensured and monitored and how targets identified in the EU Gender Action Plan and the new Human Rights toolbox will be integrated in the CSO-LA programme.

Development Education and Awareness Raising

The information provided by the working document, in line with the MIP, is brief and mentions no major changes in the shape of the new DEAR programme, compared to the previous programming period.

Before shaping the new DEAR programme in detail and defining the upcoming 2016 call for proposals, CONCORD would suggest evaluating the new features introduced in the 2013/2014 call for proposals.

Especially the required budget size and geographic coverage should be evaluated in light of effects of the level of coordination required for coordinating organisations, as well as potential effects for smaller CSOs and their access to DEAR funding for projects with a European dimension.

CONCORD welcomes maintaining a strong and effective DEAR programme and emphasizes that it should be focused on supporting CSOs and LAs. CONCORD remains at the EC's disposal for a more extensive and comprehensive analysis and consultations with all stakeholders in order to keep this programme component in line with the aim and objective of the CSO-LA Programme.