

17th September 2020, Dhaka

Open letter to Localization Technical Working Group (LTWG), Bangladesh



Isn't it a deliberate attempt to confuse Local NGO (LNGO) definition?

Confederated INGOs are indeed INGOs. LNGOs need space.

Dear Friends in LTWG,

1. **Objective and background of this open letter.** We raise this issue in reference to making an INGO (a part of an international confederation) the “Chair” of LTWG, which ideally should have been a local organization. The INGO claimed itself as a local/ national NGO of Bangladesh, mentioned in a [statement about localization, published in their confederation’s web site](#). They said that they have performed all due national legal obligation in Bangladesh to be a local NGO. Some other INGOs (not all of them) who are part of their own international federations have also claimed this. But we, the [BDCSOprocess](#), opposed this claim. The same claim was also strongly challenged and protested globally by all the southern local and NGOs during LMWG (Localization Marker Working Group) and IASC (Inter Agency Standing Committee) definition discourse. LTWG steering group should not have embarked on such a debated issue again, particularly in this very beginning stage. The simplicity of Bangladeshi local and national NGOs should not be exploited. In this open letter [BDCSOprocess](#) tried to explain the rationales behind this opposition, international and national references of agreed commitments/ agreements in this regard and above all, what wrong signals/ examples the LTWG is creating through this.

We consider this as legitimizing INGOs for fund raising at local and national level that creates an uneven competition with local and national NGOs. In fact, this will hinder the sovereign and sustainable growth of local and national NGOs which is envisaged in all Aid/ Development Effectiveness declarations especially in Grand Bargain commitments. It defeats the spirit of home grown local ownership. Moreover, we the local and national level NGOs believe that INGOs and UN agencies should limit their role in monitoring and technical assistance at the national level in view of complementarity and inclusiveness. They have even greater role to play at the international level. Some INGOs are already carrying forward with such activities.

In reference to the LTWG (Localization Technical Working Group) meeting held on 31st August, and the letter of Mr. Reza (Coordinator of BDCSOProcess) issued to you on 30th August, he tried to convey our reservations to the key organizers through one to one meeting and then in small groups involved in LTWG steering (UNRC officials, Start Fund Bangladesh, and NIRAPOD). We believe in positive engagement and friendship with all possible stakeholders. Now we are placing the key reservations of [BDCSOprocess](#), a process forum of Bangladeshi NGO/CSOs.

BDCSOprocess and its secretariat leaders have a long background of involvement in the global processes including in Principle of Partnership (2007), World Humanitarian Summit / Grand Bargain (2014 – 2016), Aid effectiveness to Development effectiveness (Monterrey 2003 to Nairobi 2016), countrywide awareness and campaign on all these issues and to frame country-specific demands (2017 – 2019) finally which was culminated in [a national conference during 2019](#) and announced [Charter of Accountability](#) and [Charter of Expectation](#) with a set of demands.

2. **While dealing with three different interest groups (L/NNGO, INGOs, and UN agencies) towards localization, LTWG should have been cautious about possible conflicts and could have a consensus on group process.** Especially, the involvement of UNRC office, who promotes multilateralism, escalated our **expectation of the highest level of transparency, neutrality (i.e., free from conflict of interest)** and consensus-building effort. They have intended to deal with this diverse interest group. It could have been done through open discussion with the leaders of distinctive groups as well as with the campaign group, who have record of mobilizing campaign on localization. Instead, they have jumped into steps one after another, only through email correspondence. This is how the entire process have created all these debates. We wonder whether it is a right step to attach this to HCTT (Humanitarian Coordination Task Team) in this state of affairs.
3. **The key steering holders (UNRC office, Start Fund Bangladesh, and NIRAPOD) overlooked the experience of conflict in NGO Platform (NGOP), in the Rohingya's response, Cox's Bazar.** The NGOP had to accommodate three separate voting categories i.e., local, national, and international NGOs. The platform is merely working as an information channel and is hardly able to play a role in advocacy as it face some limitations to establish common minimum principles of inter-group unity by defining complementarity and inclusiveness.
4. **Complementarity and inclusiveness. UN agencies and INGOs have a great role to play in monitoring and technical assistance.** We believe in complementarity and inclusiveness. No single agency can claim to have all in all capacity to respond to a humanitarian crisis. UN agencies, INGOs L/NNGOs- everyone's presence is needed but with a different role. We believe that UN and INGOs have a great role to play at the international level including conflict resolution, peace building, fundraising, research and campaign, especially to promote global humanitarian issues. For example, one INGO is organizing Rohingya diaspora worldwide to raise the voice on Rohingya issue. INGOs can play a great role to mobilize interfaith leaders for Rohingya issue and standing against the genocide. INGOs also could promote to share the responsibility of 1 million Rohingya refugee by many other countries when Bangladesh alone is shouldering it even after having other multidimensional problems including climate change. After the COVID 19 pandemic, INGOs and UN agencies could play a role against protectionism and to promote global citizenship to take humanitarian responsibilities. As stated in GB, all parties have agreed to promote a sustainable and accountable response mechanism and this is why we want to promote leadership and primacy of NGOs at the local level. We, therefore, urged UN agencies and INGOs to shift their role to monitoring and technical assistance and to handover the operation and implementation to LNGOs to ensure sustainability and accountability at the local level.
5. **Division of labor first in view of global commitment to have one team.** Identifying the different and special roles for entire humanitarian response according to comparative advantages as well as in view of GB and C4C commitments, all the UN agencies, INGOs, and L/NNGOs could be one team. Sustainable leadership and growth of LNGOs is possible if UN agencies and INGOs have (a) **policy and practice for criteria based partnership selection process, free from conflict of interest, which is transparent and competitive,** (b) **partnership agreement and practice based**

on the Principle of Partnership. UN agencies and INGOs should also redefine the so-called "capacity development" which is top-down, one way and a bit colonial. It should be considered as "capacity exchange" (Please see HPG-ODI study) accepting the LNGOs also have some inherent capacities which are indispensable for accountable humanitarian response at the local level.

6. **These are related to our reservations on (a) having an INGO as the Chair of LTWG.** Please note that we have profound respect for the contribution of that INGO and (b) limitation in Process as we felt LTWG is going a bit exclusively with different interest groups. Our reservations are as follows.
 - a. We consider the proposed **"Chair" of the LTWG** as an INGO according to the available international agreements, **and the chair should be a local NGO. This instance will convey a wrong signal to the world that Bangladeshi local and national NGOs have accepted the claimed entity (local and national) even when the INGO is a part of an international confederation. This is already debated and challenged at different global forum.**
 - b. **Being a part of its international confederation, the INGO get funds and technical assistance from their confederation members situated in different countries. Study shows that the INGO in Bangladesh gets such funding from their 17 federation members, on top of other donors.**
 - c. These might motivate other INGOs who are also considering themselves as local and national NGO having local staff and board members in the aid recipient countries. This will shrink spaces for the local NGOs by bringing them into a ploy of uneven competition for nationally available funds. The international funds will be even farther for them where different agencies consider allocating 25% for L/NNGOs. Start Fund Bangladesh is an example of what is hard to accept. **If INGOs believe in localization, they should believe in level playing field for L/NNGOs. INGOs' fundraising and leadership role could be limited to the international level.**
 - d. **We know few INGOs announced that they won't go for fundraising at national level considering the level playing field for L/NNGOs. We salute them.**
7. LTWG is proceeding with **three major limitations in process:**
 - a. LTWG did not have a **prior agreement on the process** (e.g., rules of the game, how to go with a diverse group for localization, minimizing conflicts among parties) with the key group leaders with these three distinctive groups, L/N NGOs, INGOs, and UN agencies;
 - b. LTWG has **not decided where to focus**, e.g., the focus should be the roadmap to localization and building consensus rather than the discourse on how and who would hold the portfolio. There are networks at global level, even in Bangladesh, the run and manage show without having tangible portfolio (e.g., BDCSOprocess);

- c. LTWG did not have **mapping on existing networks on localization, what are their positions, review of knowledge materials, thereby to identify learnings.** They have avoided BDCSOprocess (www.bd-cso-ngo.net) who have extensive background on the campaign, position, and knowledge/resource materials. They have also avoided Cox's Bazar based network CCNF (www.cxb-cso-ngo.net) who also has a long record of campaign, position, and knowledge materials on this particular issue. CCNF has success for having LTF (Localization Task Force) led by UNDP and IFRC, initiated by UN agencies. Due to all the lacking, LTWG might lead to create confusion/contradictions.

It is easily foreseeable that in such situation the process results have chances to go to the hand of powerful groups, which might create chaos and damage to the growth and leadership of L/NNGOs. The leadership of L/NNGO is essential for localization as stated in [Grand Bargain commitment](#), [Principle of Partnership](#), [Charter for Change](#), and also in recently published [IASC \(Inter-Agency Standing Committee\) interim guideline on localization during COVID 19](#). We have to understand that the prevailing situation, ongoing practice, fund scarcity and uneven competition for the fund might create chances to deprive the LNGOs.

8. **Confusion on who is local, national, and international.** Some colleagues in the 31st August meeting tried to convince that it is still undecided and there are confusions on the definition of local, national, and international NGOs. From our common sense, we can easily understand or decide who is local, national, and international.

Apart from that, let's see the IASC definition. [IASC](#) is the highest body in respect of coordinating humanitarian response formed in view of UN resolutions 46/182 of 1991. Please go through the ['Definition Paper, IASC Humanitarian Task Team, Localization Marker Working Group, 24 January 2018.'](#)

Local and national non-state actors are "Organizations engaged in relief that are headquartered and operating in their own aid recipient country and which are not affiliated to an international NGO". Note: "A local actor is not considered to be affiliated merely because it is part of a network, confederation or alliance wherein it maintains independent fundraising and governance systems" (text endorsed by GB signatories). Local and national non-state actors include:

- a. *National NGOs/civil society organizations (CSOs): National NGOs/CSOs operating in the aid recipient country in which they are headquartered, working in multiple subnational regions, and not affiliated to an international NGO. This category can also include national faith-based organizations.*
- b. *Local NGOs/CSOs: Local NGOs/CSOs operating in a specific, geographically defined, subnational area of an aid recipient country, without affiliation to an international NGO/CSO. This category can also include community-based organizations and local faith-based organizations.*

In this paper, it is also stated on who are international both from the southern and Northern origin. Here are quotes from the same paper.

Definitions that are not included in the above categorization of national and local actors are:

- *Internationally affiliated organizations: Organizations that are affiliated to an international organization through inter-linked financing, contracting, governance, and/or decision-making systems. This category does not include local and national organizations that are part of networks, confederations, or alliances wherein those organizations maintain independent fundraising and governance systems.*
- *Southern international NGOs: NGOs based in aid recipient countries that are not OECD member countries, carrying out operations outside of the aid recipient country in which they are headquartered and not affiliated to an international NGO. The same organization can be classified as a national NGO/CSO when carrying out operations within the country in which they are headquartered.*
- *International NGOs: NGOs are not based on an aid recipient country and carrying out operations in one or more aid recipient countries.*

It is clear who could be local, national, and international. But, we know that some INGO can take benefits to claim themselves local and national as they did in their localization paper, taking the advantage of confusion created by "Note" mentioned above. Although according to some lines of definitions they are not local and national. In the same way, Southern-based INGOs cannot be considered as national NGOs, but there is a confusing line too.

But, Southern local activists have contested all these confusions in different forums, please see the [A4EP \(Alliance for Empowering Partners\) papers published in the UN OCHA website "Relief Web"](#). They argued to stick to the original suggestions from Localization Marker Working Group (LMWG) as follows. [The same view has also been expressed by the NEAR letter to the Grand bargain leader during June 2017. A4EP, NEAR](#) are also networks of southern NGO / CSOs.

Definition of local and national actors:

National NGOs/civil society organizations (CSOs): National NGOs/CSOs operating in the aid recipient country in which they are headquartered, working in multiple subnational regions, and not affiliated to an international NGO. This category can also include national faith-based organizations.

Local NGOs/CSOs: Local NGOs/CSOs operating in a specific, geographically defined, subnational area of an aid recipient country, without affiliation to an international NGO/CSO. This category can also include community-based organizations and local faith-based organizations.

Final definitions adopted by the IASC??

Once the definitions were submitted to the signatories through the co-conveners, effort ensued to dilute the definitions as many international confederations, who have country offices and INGOs with national offices in the global south, wanted their national offices

*to qualify for the 25% funding committed for the local/national actors. **Consequently, the definitions were significantly altered, violating the democratic pattern followed thus far, to suit the interest of such global actors.***

Please note that the LMWG proposal was based on a long proposal and especially based on a worldwide survey with around 450 respondents, where these definitions had received around 90% affirmative vote.

Finally, A4EP asked in the paper for following in respect of the definition

- ***Immediate restoration of the original definition of local and national actors produced by the LMWG;***
- ***To respect the spirit of commitment the Grand Bargain, only home-grown organizations, with no direct or indirect affiliations with international affiliations, should be considered local and national actors.***

As stated in the [latest Grand Bargain agreements](#), please note the spirit as below. *"National and local responders comprising governments, communities, Red Cross and Red Crescent National Societies and local civil society are often the first to respond to crises, remaining in the communities they serve before, after, and during emergencies. Grand Bargain Signatories are committed to making principled humanitarian action **as local as possible and as international as necessary** recognizing that international humanitarian actors play a vital role particularly in situations of armed conflict. **Grand Bargain Signatories engage with local and national responders in a spirit of partnership and aim to reinforce rather than replace local and national capacities.***

So, there should not be any ambiguity concerning the definition of local, national and international entities. We should concentrate on the homegrown organizations without linking to any international affiliation who is local and national.

9. **BDCSOprocess takes position to keep such spaces exclusively for local NGOs.** On top of these major opinions flow, our position in this regard:

- While the proposed chair, the INGO is a part of an international federation, it should not claim itself as a national and local actor, while it talks about believing in localization. Having a distinctive advantage, it can create uneven level playing field for local and national NGOs regarding fundraising at the national level (e.g., competing at Start Fund Bangladesh).
- The INGO should consider handing over the national level spaces to local and national NGOs if they believe in and intended for localization.
- According to their website, they have very little partnership with local and national NGOs especially in Bangladesh. Then we wonder whether they have any experience in this regard.
- We believe, apart from fundraising scope, colleagues and leaders of local and national NGOs should be promoted to all possible leadership at local and national level. Because it is the best and only available ground for leadership exercise space for L/NNGOs.

10. Last but not the least, is LTWG heading towards reinventing the wheel? Enough talk, it is time to walk ahead. BDCSO process do like to refer a document released on 1st October 2017 and endorsed by around 50 prominent local, national NGOs and including networks like NIRAPD, titled [“Our Common Space, Our Complementary Role, Equitable Partnership, Sovereign and Accountable Civil Society Growth”](#). This paper is an outcome document of the long participatory process, placed in [a public forum on 19th August 2017 funded by Oxfam and Start Fund Bangladesh](#), and where a good number of INGO and L/NNGO leaders participated and spoke. The document proposed **five key demands, such as:**

- (i) INGOs should stop fundraising at the national level;
- (ii) Whistle blowing and complaint response policies should be included in UN and INGO partnership policies;
- (iii) Minimum 10% overhead cost to the partner organization, not only for central management but also for future institutional development;
- (iv) Stop the brain drain from NNGOs, introduce an equal level of compensation for the same level of competencies;
- (v) Partnership agreements must include a clause of arbitration and joint/reciprocal evaluation.

Here are 17 specific demands from L/NNGOs in this regard:

- 1) INGOs and UN agencies’ primary role should be to facilitate and promote local civil society in the global south.
- 2) Principle and criteria based partnership with LNGO/ NNGOs, creating a transparent and healthy competition but maintaining the highest level of inclusiveness and coordination.
- 3) Bengali should be the communication language for all INGOs and UN agencies working in Bangladesh while they will be communicating with partners.
- 4) Activate existing networks first, before forming a new network, the process must be transparent and inclusive.
- 5) INGOs must prioritize a campaign against "De-globalization of humanity and responsibility" in their country of origin.
- 6) Cash programming should not be considered without considering local context, which might undermine civil society development, and a community approach in southern countries.
- 7) Priority should be to create self-esteem and self-made approach: capacity standard has to be contextual, accountability should be first rather than accounts-ability.
- 8) Localization means local control: the national pooled fund should be managed, controlled, and owned by NNGOs. Creating intermediary contradicts sustainability.
- 9) LNGO and NNGOs who’s leadership is originated from a specific locality or group of people should get priority to implement projects for that specific locality or groups: No to imported NNGO or LNGOs in a locality with temporary project assignments.
- 10) We all (UN organization / INGOs/ NNGOs/ LNGOs) should have a participatory multi-stakeholder and open review of the cyclone (e.g., Ruanu and Mora) and flood (e.g., Haor) response in view of WHS and GB policy outcome. Duplication of mistakes is a wastage of resources.

