

Dhaka and Coxsbazar, 9th January 2023

Subject: **“DG ECHO can minimize the Gap between Policy and Practice in Localization”**
Feedback from CCNF (www.cxb-cso-ngo.org) and BDCSOPProcess
(www.bd-cso-ngo.net) on draft EU paper “Promoting Equal Partnership with Local Responders in Humanitarian Settings: Guidance Note (December 2022).”

1. We welcome the paper, paper is encouraging for the local CSO/NGOs, we studied and discuss the papers with the leaders of local CSO/NGOs working in the ground and we have the following submissions in view to promote equal partnership with local responders.
2. **We praise ECHO commitment.** One of our leader Mr Abu Morshed Chowdhury – PHALS have had a meeting with DG ECHO Mr Michel Kohler along with representatives from eight other countries during November 2022. He found ECHO is committed for Grand Bargain 2.0 on the issues of (a) increasing multiyear funding, (b) increase to support country based pooled funds to promote localization, (c) committed to promote equitable partnership, (d) committed to supporting the value and use of needs assessment and (e) committed for earmarked funding. The team also highlighted the role of intermediaries, fund for anticipatory actions, especially for the Bangladesh which is very much prone for climate change impacts.
3. **At least 25% direct funding to southern NGOs.** We know that, there is no direct access for local NGOs working in southern countries to the ECHO, local NGOs can only have access if they go for partnership with any NGO of EU countries and with the leadership of EU NGOs. We do like to request to change the regulations. At least 25 % of the EU funding should go directly to the NGOs of southern countries.
4. **A cash contribution is hardly possible.** There are examples that, EU-funded NGOs and several UN agencies asking local NGOs to contribute around 5 to 15 % of the total budget allocation, it was in kind, and time from local NGO executives in past used to be considered as contributions, too. But now it has to ensure a cash contribution. EU has to understand that, local NGOs except for Micro Finance organizations, there is little capacity for contribution. So the practice has to be eliminated.
5. **Space only for homegrown local organizations.** Now it becomes a trend among international organizations (INGO) and federated INGOs to make local board and take local registration in southern countries and claim them as local NGOs. In this process, they raise funds both from the local level and also from the international level. A prominent pooled fund like Start Fund is one example in this regard. Local NGOs have to suffer uneven competition with INGOs in this regard. EU has to be aware of this and give facilities only to homegrown local organizations.
6. **Study findings should be taken from already implemented localization projects.** There are a lot of localization projects is being funded by donors being managed by INGOs in our countries. In the name of the participation, they take the participation of local NGO leaders in the committee, but in fact, it is the INGO leaders who control everything, but all the risks are being transferred to local NGOs. In the name of capacity building, there is a huge amount of training is being conducted, there is a little amount of project work. There is hardly any baseline study, for the identification of policy and practice bottlenecks both at the macro and micro levels. There should be studies in this regard and also we need to identify what good pieces of evidence have worked well in respect of developing local organizations and local leadership.

7. **Guidance should also address UN agencies, as they do the job in partnership with local NGOs.** The guidance has been drafted basically addressing INGOs, but in some of our countries, the majority of humanitarian funding is channeled through UN agencies, e.g., around 80 % funding being channeled through UN agencies in Rohingya response. CERF (Central Emergency Response Fund) is mostly channeled to UN agencies. So, we urge the EU to address this guidance should also toward the UN agencies as they also take a partnership with local NGOs.
8. **Policy for partnership selection should be in a transparent and competitive manner.** For the promotion of sustainable and accountable management and leadership of local NGOs needs fair and transparent competition in getting funds is necessary. Though there are most of the time open advertisements inviting EOI (Expression of Interest) but most of the partnership selections by UN agencies and INGOs are being happened in a non-transparent manner, and there are allegations of cronyism and patron-client relations. So, UN agencies and INGOs should prepare a policy taking the long-term perspectives, which has to be practiced transparently and competitively to promote local organizations based on sustainability and accountability. Agencies and INGOs should give priority to accommodate critical CSO voices in the frontline, so that there is a continuous voice for gaining efficiency from effectivity.
9. **EU has to embark on CSO, rather than promoting NGOs as service contractors.** EU has to embark on CSO building, in our country context, we do not tell the NGOs as CSO who only do service delivery. We want to see the NGOs along with service delivery and also fighting for democracy and human rights at the local level. We strongly believe that, without commitment to democracy and human rights there will be hardly any responsive and accountable government that is taking care of its citizen on a sustainable basis.
10. **Simple proposal and reporting format for a greater inclusivity of local NGOs and promoting Localization.** Due to huge task and long analytical project proposal format, many local NGOs cannot go with it. So, the only option goes to that INGO, who has the capacity to fill it up and select local NGOs as partner of their choice. This practice loses transparency and reflects poor participation of local NOGs in the bidding. Therefore, introducing simple proposal, Reporting format, and partnership regulations, will enable local NGOs to be engaged more.
11. **The guidance note is an excellent document. But it would lose momentum if it is kind of a Merely moral guidance, and not obligatory.** No intermediary INGO will be held accountable if there was any breach of partnership with local NGOs in humanitarian response. After the project, there should be a 3 rd party evaluation on the performance of both the INGO & local partners and the report directly goes to ECHO.

Drafted by;

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