

Comments on the Progress since Paris Report from the Task Team on CSO Development Effectiveness and Enabling Environment (July 4th 2011)

We welcome the fact that this document draws upon the work of the various clusters as well as other evidence on the progress made since the Paris Declaration and the Accra Agenda for Action. We especially appreciate that the Report points to some of the evidence in the Task Team's Review of Evidence paper. It would be welcomed if the Task Team paper could be added to the References and Bibliography, at least for Chapter 2. We also welcome the reference made in the text to the Istanbul Principles of CSO Effectiveness, which is a major progress on the part of CSOs since the AAA.

We believe the report could benefit from a broader coverage of the role of civil society and would like to make the following suggestions:

Chapter 2: Ownership

It is welcomed development that this year's PD-survey included an optional module regarding broad participation in development policies (see para 21). We note that there are references to the limitations of this voluntary process of measuring broad-based ownership, such as the completion by a limited number of countries, and the fact that the answer is based on self-reporting. The text would benefit by adding a bullet point to raise the possibility that the low response rate (16%) could be an indication of the lack of value accorded to the concept and practice of broad-based and inclusive ownership, and a lack of incentives for the 80 countries that participated in the 2011 Paris Monitoring Survey to track progress regarding AAA principles on broad-based ownership. This lack of value accorded to the concept may be linked to the more restrictive environment facing CSOs in a number of countries (some reports mention that up to 90 countries have recently implemented restrictions to the enabling environment for CSO, which runs counter of the commitments made in AAA regarding the enabling environment for CSOs).

Hence, the fact that the text is referring to restrictive legislation is appreciated. It should be noted that this worrying tendencies to limit CSO activities are not confined to a few countries, but there are well documented evidence in a large number of countries (both in donor and partner countries) that the enabling environment for CSOs is becoming more restrictive. It would also be worth mentioning that the language and concepts of the Paris Declaration, particular the reference to "country ownership" and "alignment", are in some instances being misinterpreted in developing country's regulatory frameworks, that overly-constrain CSO activities (for further information see the Task Team's Review of Evidence and reports from CIVICUS and ICNL). Similarly, in some donor countries there are increasingly directive policies that orient donors' engagement with CSOs and that are narrowing modalities of support which may affect the effectiveness of CSOs as development actors.

Chapter 5: Transparency and accountability

Although fully supporting the need for transparency, and recognizing that all development actors have a responsibility to be accountable for their aid and development efforts, we believe that it would be

important to problematize the issue of transparency a bit further. For example in para 23 a sentence could be added about the need for specific discussion on the best way for IATI to address donors' aid flows to and through CSOs, with attention to the following issues:

- Ethical obligations regarding confidentiality, particularly acute in failed or fragile states or the growing number of countries restricting space for civil society operations so as to not jeopardise the continued operations, safety and security of CSOs or individuals associated with them.
- Reporting burden on CSO recipients of aid and their partners ensure the detailed data required by IATI is updated on a quarterly basis

Finally, overall it would be useful to see even short coverage of civil society under the chapters covering the other principles besides ownership. A short discussion of whether and how donors are coordinating their support to CSOs, as well as whether and how CSOs are coordinating amongst themselves and with other actors, and/or the degree to which the Istanbul Principles might help address this issue, could be included in the Harmonisation chapter. Some evidence on this topic is found in the OECD study, but other sources might need to be drawn from too.

More detailed comments:

Chapter 1: Future Considerations section

Given the centrality of ownership to the success of all Paris and Accra commitments and aid effectiveness overall, and the considerable evidence covered by Chapter 1, the "Future considerations" section could be stronger. For example,

Bullet one: "Strengthening ownership and capacity - including that of non-state actors - to develop, *implement and monitor* evidence-based and prioritised strategies and policies should be seen as a longer-term endeavour." The addition in italics would address the issue raised in para 21 that while non-state actors are sometimes involved in the formulation of national development strategies, there is not so much engagement in implementation and monitoring activities.

Bullet two: There is already considerable evidence pointing to gaps with regard to citizen participation and the enabling environment, some key sources of which are pointed to in the Report, including the Survey's optional module on inclusive ownership and sources pulled together by the Task Team on CSO Development Effectiveness in its Review of Evidence. While the reference to a need for continued evidence gathering is welcome, and while the political sensitivity of this topic is recognized, stronger wording is needed here in keeping with the kind of wording used to conclude other chapters in the Report. The paragraph could be edited with the following in italics: "Measuring the extent to which commitments on "ownership" have been implemented remains challenging, *though there is evidence to suggest limited progress to date, and in some instances, a reversal.* Continued efforts to *monitor and generate* evidence on the broader dimensions of ownership - including citizen participation and the environment in which non-state actors operate - could help to *build common understanding of the way*

in which inclusive ownership underpins the sustainability of all efforts to enhance aid effectiveness, while strengthening dialogue internationally and at the country level, and building support for fuller implementation of commitments on ownership."

Bullet three: Again reference to non-state actors' involvement in *monitoring* national development strategies could be added to the first sentence. In addition, and in keeping with the recommendation regarding Para 33 above, something needs to be said about donor practice in supporting CSOs in ways that promote ownership. The following sentence could be added to the end: *"It is equally important that donors' support CSOs in ways that are demand-driven and responsive to locally-owned CSO programs."*

Chapter 6: Results and mutual accountability

Para 15 states that sustained improvements in statistics also requires strengthened and increased demand for data. A partial solution is that plans for improving statistics should be linked to national strategies and other planning documents, to which could be added *"and plans to broaden and deepen ownership and inclusion of CSOs and parliaments in the monitoring of national plans."*

Chapter 7: Experience in Monitoring

Para 7 does not say enough about the level of participation of different stakeholders in the monitoring exercise. Further analysis beyond "the level of engagement...varied across countries" would be useful. In turn, Chapter 1 para 5 may need qualifiers e.g. *"...with...varied degrees of participation from civil society, parliamentarians and the private sector."*