



## **Contribution on the guidelines of the NSA-LA thematic programme**

### **Response to the Europeaid consultation on the calls for proposals 3rd quarter 2009**

The Platform welcomes the European Commission's wish to consult local and regional authorities (LRA) on the content and conditions for the calls for proposals for its Non-State Actors and Local Authorities programme.

Since this is a recent programme, both the LRAs and the European institutions are in a learning phase. Indeed, in most European countries, the search for European funding is a new step for LRAs involved in decentralised cooperation projects.

The following observations aim to propose changes that could be made to the calls for proposals to encourage greater participation by the LRAs in the NSA-LA programme.

Contributors to this consultation from within the Platform were:

- United Cities and Local Governments
- Conference of Peripheral Maritime Regions
- International Association of French-speaking Mayors (AIMF)
- Council of European Municipalities and Regions
- Local Government Association (United Kingdom)
- French Association of the CEMR
- Italian Association of the CEMR
- Swedish Association of Local Authorities and Regions (SKL)
- City of Lyon



## **1- Priority themes of the call for proposals** **Objective 1 (multi-country)**

Defining priority themes is important. The goal of the NSA-LA programme being to support the right of initiatives by NSAs and LRAs, it would not appear necessary to make these themes a criterion for eligibility for the projects presented within the framework of objective 1 of the programme.

As a priority the guidelines should emphasise concrete projects corresponding to the statutory mandate, skills and expertise of the LRAs:

- Improving the living conditions of local people through the construction and / or overhaul of infrastructure (access to drinking water and basic sanitation, primary education, basic health, markets etc).
- Strengthening the abilities of the LRAs, in particular through training for elected representatives and managerial teams in the following fields:
  - o regional development, **strategic urban planning**, risk prevention, local funding, access to NICT,
  - o local services: reinforcing water management services, technical services, the waste disposal service, public transport, public social services such as preventive medicine, education and culture,
  - o adaptation to climate change and research,
  - o promotion of the human and cultural heritage
  - o social inclusion of disabled people;
  - o In fragile States, bolstering local stability through local democracy and support for the local economy.
- Promoting a **strengthening of citizen participation**: the ability of local governments to interact with their community organisations, including action aimed at developing and strengthening networks bringing together LRAs and other local players such as local NGOs, foundations, unions, universities, hospitals, commercial and agricultural associations or migrant, sports or young people's associations etc. structured dialogue between the local authority and users of facilities.  
New projects such as social project management or projects at the neighbourhood level bringing together the neighbourhood committee (local people), elected representatives and the municipality and aimed at improving the living conditions of local people in several ways (water, sanitation, waste disposal, education, markets etc) might be preferred.
- Backing feedback discussions between LRAs, in particular in the context of action in combating urban poverty and social exclusion.
- **Strengthening the ability of LRAs and their associations at the national and international level** to increase their role in the processes of decentralisation, supporting the participation of local governments in the strategy for achieving the Millennium Goals and in developing a more efficient aid agenda as well as action aimed at improving the recognition of Local Authorities as partners in the policy of regional development and integration.  
Strengthening Local Authority partnerships, associations and networks (North-South and South-South), in particular cross-border associations or networks in the partner countries.



It would appear that priority should be given to projects supported and submitted to the EC by LRAs from the South with technical assistance provided by the LRAs from the North in:

- The elaboration of the projects,
- Their contracting authority's role which has responsibility for policy and the technical and financial aspects

Additional observations about the multi-country and in country lines:

- Projects between LRAs from several countries enable greater consultation and coordination in the projects developed. However, they appear most complicated to plan and often present the risk of devoting comparatively too many resources linked to expertise (travel, consultants' fees etc) compared with the need to find concrete answers to the problems of territories undergoing development. This approach should not be systematically imposed.
- For the in country line, the list of countries concerned is shorter for the LRAs than for the NSAs and the emphasis is often placed on fragile countries in which it is the most difficult to set up partnerships. Widening the list of priority countries would enable more LRAs to get involved. The Platform is at the Commission's disposal regarding an opinion on the choice of the target countries in consultation with the Delegations.
- The distinction made for proposals from Non-State Actors and Local Authorities for objective 1 - multi-country proposals marks progress in awareness of the different nature of local authorities and non-state actors. This procedure could be extended to the programme's other calls for proposals, in particular objective 1 in-country and objective 2.

## **2- Project budget**

On the multi-country line, the minimum amounts for the projects are relatively high for LRAs. A lowering of the minimum budget thresholds for the project proposals would be welcomed.

In several European countries (Sweden, United Kingdom, Luxembourg etc), the LRA's do not have the authority to commit funds to development cooperation. Participation in the NSA-LA programme is difficult for them because of the required 25% co-funding. If the value of the working time and expertise of a LRA employee (and not of an outside consultant) could be included in the budgets, this would encourage the LRAs of these countries to submit projects.

## **3- Information about the programme and training**

In order to encourage, LRA participation to the programme quantitatively and qualitatively, it would appear necessary to organise information / training workshops for the programme on a regular basis, in particular for the community procedures which are rather complex.

This would involve holding workshops both in the partner countries for the LRAs of the target countries and Delegations, and in Europe, in particular in the new Member States, for the European LRAs.



Holders of projects funded by the programme could also take part to encourage an exchange of experience.

The Platform is ready to provide support to the Commission in this information and training mission.

#### **4- Publication phases**

Compiling a full application file requires the deployment of substantial human and financial resources: possible field-work, drawing up a detailed budget, collecting documentary proof, PADOR registration etc. Submitting the concept note and then the full application form later would seem appropriate to avoid wasting efforts on preparing a project that will not come to fruition.

However, it is proposed that the analysis of the eligibility of the tenderer and its partners is made as quickly as possible, even as soon as the concept notes have been selected in order to avoid the submission of the complete form by tenderers which are not eligible.

#### **5- Publication dates for the calls for proposals and response timeframes**

For this year, on account of the summer holidays, the calls for proposals could be launched from mid-October 2009.

Generally, it is important for the publications for calls for proposals to be predictable. It would be a positive step to set a date or a least a fixed publication period from one year to the next. This would enable work to be prepared in advance and more thorough ownership of the programme by the LRAs (in particular as regards the administrative implications).

The publication of a pre-announcement of calls for proposals to be launched would enable the LRAs to deploy the teams concerned with the project preparation and earmark budgetary reserves. Likewise, publishing an indicative timetable of the Delegations' calls for proposals would promote better preparation by the LRAs in the countries concerned and easier contact with the Delegations.

Since the methods for internal validation take longer for the LRAs which are public authorities than for NSAs, a period of at least **60 days for the submission of the concept notes and at least 60 days for the submission of the full application form** would be desirable. This second stage in particular requires time for compiling the technical file in consultation with the partners. Most LRAs require deliberations to be undertaken for making financial commitments. The more partners there are taking part in a project, the longer the technical file takes time to complete.



## **6- Application forms**

The information asked about the applicant's experience or that of its partners are little suited and difficult to provide for an LRA. Often its experience in using its skills or responsibilities (management of drinking water, waste disposal etc) is set out in legislation and is completely unlike "a project" where information can be given in accordance with the terms of the current form.

It should be noted that this procedure puts public actors, already understaffed, in a competitive situation but who must nevertheless carry out legal duties and provide essential services to local people.

Although the local authorities of the EU's partner countries have no problem in identifying worthy projects which are relevant and meet the expectations of local people, it is conversely more difficult, due to a lack of experience with European projects, for them to convey this impetus in a long form and in which certain points appear redundant.

## **7- Project selection**

In connection with the last observation above, the notation of proposals coming in particular from the LRAs of the South should reassess the relevance of the projects in respect of the form of the file. The score set for the relevance of the project could be doubled (i.e. from 25/100 to 50/100) and the scores devoted to the most formal aspects reduced by the same amount (methodology, logical framework, action plan, etc).

Improved understanding of LRAs by the assessors is required. This could be done by including local authority experts working on the ground or at the main office. A call for expressions of interest by LRA experts may well be appropriate.

## **8- PADOR**

This procedure raises several questions:

The information requested: it appears clear that the PADOR form was not initially drawn up for LRAs since some of the information requested does not correspond with the reality of LRAs.

The amount of information asked for, in particular for local authorities which have the status of a public body should be simplified, in particular regarding budgetary data.

A screen by screen review:

- Administrative data: Make mentioning the date for the creation and sending of the governing by-laws optional for LRAs. This question is nonsensical for many municipalities which have existed for centuries and do not have by-laws governing their operation.
- Profile: an LRA intervenes in all the sectors for which it is responsible. It therefore appears of no use to specify its intervention sectors and difficult to quantify the number of years of experience as well as the number of projects in these fields.



- Financial situation: the lines "Turnover"; "Net profit", "Balance Sheet Total" should be replaced by terms which are more appropriate to local authorities (Budget / Running costs, investment, tax income, grants, etc.)
- Financing sources: remove "members' membership fees", add "taxes" "State Grant"
- Audit report: Modify by changing to "Report by the authorities checking the accounts"
- Board of directors: Modify by changing to "Local assembly"/"local council", etc.

Access: Access to PADOR registration is an issue in some of the partner countries, in particular because of the quality of internet connections. It would be desirable to leave the partners from the South able to register their form after having filled it out on paper. Another solution would be to make resorting to the PADOR exemption pack easier in the event of problems of access.

## 9- Languages

The availability of documents relating to the calls for proposals in several other European languages would make wider participation by the LRAs easier: Spanish, Portuguese, Italian and Arabic among others, for the guidelines, the application form and PADOR.