



SAAPE

South Asia Alliance for Poverty Eradication

Analysis of the draft CSP on Bangladesh

The adoption of the Development Cooperation Instrument (DCI) in December 2006 opens a new chapter in the EU's relations with developing countries in Asia and Latin America. This analysis looks at the EU's Country Strategy Paper (CSP) for Bangladesh which will define EU/Bangladesh cooperation for the period 2007 to 2013 within the framework of the DCI. The draft CSP for Bangladesh has been presented by the Commission to the DCI Committee of the EU Member States for approval and to the European Parliament for an opinion. This briefing paper is the result of an assessment by Bangladesh Nari Progati Sangh (BNPS) which is the focal point in Bangladesh of the South Asian Alliance for Poverty Eradication (SAAPE). The first part identifies concerns about legal and procedural aspects of the draft CSP, and consequently its compliance to the DCI regulation. The second part provides an analysis of the content of the draft CSP for Bangladesh with a special focus on its contribution to achieving the MDGs. It gives concrete recommendations on activities the EU should engage in to support the MDGs.

PART I: Formal and Legal Concerns

The new generation of Country Strategy Papers (CSPs) covering the period 2007-2013 have to be in compliance with the recently adopted regulation on Development Cooperation (DCI). To meet these basic requirements and to allow for democratic scrutiny the CPS should include the following aspects:

A Proper Budget – In the draft CSP for Bangladesh the allocation of funds is not given in real numbers, but rather in indicative percentages. It is unclear what the percentages mean if the total allocation would increase or decrease. It is also not clear what would be done with any additional or remaining financial allocations. Without a clear defined budget it is difficult for the Parliament to effectively scrutinise the draft CSP's and its compliance with the DCI, and is therefore not in a position to reach an opinion as provided for under the terms of the DCI. The CSP should not be adopted in this form.

DAC Codes – The DCI regulation clearly lays out in Article 1 No. 4 that geographical activities need to be in compliance with the DAC criteria. This is in line with the main purpose of the regulation, which is to help eradicate poverty and promote development co-operation. While apparently other CSPs indicate the DAC Codes for each of the proposed activity, the CSP for Bangladesh does not. Without this clarity there is a risk that the draft CSP for Bangladesh may include activities that overstretch the purpose of the regulation. It is questionable whether a programme to control migration under focal sector 1, theme 2, is in compliance with DAC criteria and may thus not fit within the remit of the DCI. To enable the Parliament to control the compliance to DAC criteria it is necessary for the draft CSP of Bangladesh to indicate under which DAC Code each activity falls. The CSP should not be adopted in its current form.

Consultation with Civil Society - In Article 19 No. 3 the DCI recognizes the important role civil society plays in the programming of aid and sets out that strategy papers be based on a dialogue with the partner country or region which involves civil society and regional and local authorities, so as to ensure that the country or region concerned takes sufficient ownership of the process and to encourage support for national development strategies, particularly those for reducing poverty. However, the draft CSP for Bangladesh does not provide conclusive evidence that the involvement of civil society took place. In fact, neither our organization nor our partners were involved in any way, or invited to be involved. And when we contacted the Commission delegation in Dhaka in September 2006 on this question, we were informed that no consultation was planned. The Parliament should not accept a CSP for Bangladesh that does not take the perspective of people working at the grassroots level into account.

PART II: Concerns about content

The CSP for Bangladesh initiates a wide range of activities, which underlines the commitment of the European Union to help Bangladesh achieve the MDG and eradicate poverty. Yet, the following aspects of the programmes leave room for improvement.

Our general assessment is that the draft CSP for Bangladesh is not based on a National Development Plan. Instead the PRSP which has replaced the National Development Plan is the guiding document in drafting the CSP. However, as the PRSP has not been properly discussed in parliament or with political parties its legitimacy and the issue of ownership are in question. This lack of ownership and legitimacy is underlined by the fact that the National Parliament of Bangladesh was not consulted in the process of drafting the CSP for the country.

Gender - The analytical part of the CSP very much acknowledges the different difficulties women and girls face in Bangladesh's society (e.g. governance, human rights, trade and health). However, the response strategy includes only very limited activities to address these issues, namely a programme to make schools more girls friendly (NIP p. 4). To properly address the situation of women in Bangladesh specific programmes with clear indicators need to be developed. If gender is treated as a cross-cutting issue in one of the programmes, it ought to specify what concrete measures are taken and which indicator will be established to assess the progress.

Donor coordination - According to the NIP negotiations and dialogue are currently being pursued to establish an EU roadmap for coordination and harmonisation with other donors (NIP p. 25). To ensure consistency in the activities of all member states, the Commission needs to intensify efforts in this regard and establish clear and transparent mechanisms to allow for synergies in all the activities pursued by the EU and its members.

Education - The CSP does address the issue of education, which is very welcome in the country. However, the activities and indicators on education are only regarding quantitative aspects, while they should also address the pressing issue of quality. The methods and curricula currently in place in

Bangladesh do not provide for up-to-date knowledge that would prepare students to function successfully in the present local, regional and global context. The European Union needs to ensure that the education policy it supports aims at developing a logical and critical mindset, which empowers young people and is based on a pro-employment approach. Activities on higher education, although carried out under the regional programming, need to follow the guideline of UNESCO on higher education.

Health - Although the CSP does include health as part of a focal sector the question arises why this is funded through money from the previous CSP (CSP p. 15). It is very problematic that, since the health programme is funded through the CSP 2002-06, the programme on health is not adequately explained in the current CSP. The European Parliament should not allow EU activities to take place in Bangladesh over which it does not have sufficient control.

Although investments in the health sector are needed the current EU activities on health do not address the core issue. The EU needs to give support to health policy reform for Bangladesh which ensures access to health care for ultra-poor women, ethnic and religious minorities, disabled persons and people living in geographically disadvantaged locations. Such a reform should also aim at including safe water and sanitation facility, family planning services, maternal health care and immunization into Primary Health Care. The reform should entrust institutional responsibility for the health sector for this to local governments. A general right for Primary Health Care needs to be established. In this regard the commercialization of health services currently taking place in Bangladesh is a worrying development. If this is to continue, the EU should support the establishment of regulatory mechanisms that guarantee pro-poor access.

Employment - Although the CSP claims to focus on poverty eradication, employment is not considered in any way. The EU ought to give support to Bangladesh to initiate a reform of land use policy which supports sustainable agriculture and marginalized groups. It should strengthen the rights of small and medium farmers who provide for the nutrition of 70% of the Bangladeshi population. Further Bangladeshi labour law needs to be reformed to include minimum core labour standards in the formal and informal sector. The EU needs to keep this perspective in mind when engaging in activities on labour law reform under focal sector 1, theme 2 (NIP p. 11). Given the EU's commitment to ILO standards it is a logical and necessary step for the EU to support such activities. Any EU activities in the employment sector should support local and non-polluting materials (e.g. jute and natural fibres).

Governance – People in the country very much welcome the support to governance programmes for devolution of power to local governments given in the draft CSP. In this regard it urges the EU to intensify its current efforts to facilitate input from civil society on the local level. Local authorities must be structured in a transparent way, including providing access to official documents, to allow citizens and civil society organisations to meaningfully contribute in the process. On the national level EU support for the fight against corruption is perceived positively in the country. However, within these efforts the EU should give support to the Anti-Corruption Commission, which is not working properly at the moment. Within the EU activities on Human Rights

under focal sector 1, theme 2, the EU should also aim at building a National Human Rights Commission, which is currently not in place. Although the CSP is already aiming at increasing the number of women in local councils the EU should be more ambitious and support provisions through direct elections for 30% of reserved seats for women at all levels.

Trade - In regards to assistance related to trade it is a great concern that the CSP is prepared according to the Paris Agreement on Harmonization of March 2005. This agreement is dominated by WB and IMF agenda of promoting globalization imposing market liberalization and creating a favourable environment for foreign investment. It therefore ignores the people's concern over losing their jobs, dwelling place, the degradation of environment by polluted water, indiscriminate use of agricultural land for commercial purpose, privatization of basic services like health and water, etc. Instead of using such a development model as the basis of its activities the EU should support a sustainable economic model which is based on small and medium agricultural producers.

Environment - While the CSP for Bangladesh does include environmental issues with a very narrow focus on disaster management a much larger perspective is required. The aim needs to be to conserve and protect forests, water and air from pollution and insensitive and indiscriminate intervention while paying specific attention to the land of the indigenous people. To achieve this, the EU needs to give support to a reform of the Environment Act of 1995. It needs to help establish user friendly Land Information Systems (LIS) along with cadastral information. Management facilities on communal and regional level need to be developed that allow for optimum utilization of land, water and forestry. The CSP needs to address the pressing issue of arsenic poisoning of ground water in Bangladesh and needs to support measures to fight this pollution.

Food security - Food Security in Bangladesh is addressed in the current CSP, however, the approach taken by the EU only provides for access to food, while a solution of the issue requires a broader approach. A sustainable solution on food security needs mechanisms to protect small and medium agricultural producers and the provision of technical support on marketing, storage, input, crisis management and resources. Furthermore mechanisms are necessary to prevent the entry of unsustainable and detrimental technology and species, specifically GMO crops. If the EU truly wants to find a solution to the issue of food security it needs to give support to such a wider approach.

Conclusion

Given the all the abovementioned deficiencies with regard to legal and formal concerns as well as in regards to content. The European Parliament should seriously reconsider the CSP for Bangladesh and demand that the Commission revise the draft CSP for Bangladesh taking into account the suggestions formulated on each issue into account.

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