

Dhaka, 25th June 2020

Draft: **It is Time to Walk NOW on Localization in Rohingya Response.** Comments on the draft report “Localization Roadmap for the Humanitarian Response in Cox’s Bazar” by CPJ (Centre for Peace and Justice), Brac University June 2020, from the national and local NGO representative of SEG (Strategic Executive Group) on Rohingya Response.

- 1. Thank You UNDP, IFRC, CPJ and UNRC.** Thank you UNDP and IFRC for leading the Localization Task Force (LTF) and commissioning the report. Also thanks to the UNRC who was behind all these effort, always listened to and guided us. This might be the first in this kind of study on how localization could be integrated in respect of refugee humanitarian response. We are also thankful to CPJ Brac University for the work, especially to Barrister Manzoor Hasan. We would like to request CPJ to make abridge version of it (could be limited in 5 to 10 pages) after necessary revision, with actionable recommendations, so that a policy makers will understand it easily. Now it is more than 100 pages. Our comments should be added as an annexure of the LTF final report.
- 2. Localization by default or by choice? Delaying is delaying.** Along with CCNF ([Coxsbazar CSO NGO Forum](#)) we have been advocating for the [process of localization since the Rohingya influx](#) (September 2017). GB field mission came to Bangladesh in September 2018. After formation of LTF we have spent around 6 months to set the leadership, 6 months for the study and maybe we need another 3 to 6 months for report finalization, including placing to SEG to be agreed with. That means it may take whole 2020. So, it is an extraordinary delay in the total process. Localization is the low cost, accountable and sustainable approach of humanitarian response. In the meantime approximately \$2.5 billion has already been spent. Due to COVID 19 expatriates are already in restrictions for field movement. There is an inevitable and drastic fund reduction resulting from economic recession. So, instead of being a by default option, localization must be a planned process and should start immediately. Anyone should realize that incoming situation should not wait for the report.
- 3. It is the approach to defuse the ticking time bomb, no more talk, it is time to walk.** Localization means to meet the greater demand with appropriate cost structure putting WoSA (Whole of Society Approach) in place. Fund reduction should not affect only the food and other necessary supply. The need and aspiration are greater now including pre-fabricated two-story shelter ([as CCNF demanding since the beginning and repeated those again during positioning on JRP 2020](#)), higher level of education and income generating activities as primary needs in the camps along with social cohesion and peace building. There hardly any clear statistics have been able to give on 25 % to the host community from ISCG, there are little of “Coxsbazar District Planning” effort from UNDP. CCNF studies shows that partnership of local NGOs has been reduced to 4 to 8 % both in camps and host communities. We observed there are might be some hidden local NGO drive out process is happening in Rohingya response. Local started to think what have had happened it is mere public relation job, very little in reality. ISCG present leadership hardly give space to the local NGO leaders for simple meeting and appointment. Since the beginning there is no space for local government in response management. Frustration is gradually growing up both in the camps and outside. UN agencies and INGOs need to show “GENIUNE” inclusive approach toward local NGOs and local governments, we believe in involvement of UN agencies and INGOs but with dignified and equal partnership. At the end it is not the gift project, physical infrastructure will not work, it is the equal partnership for social

cohesion and human / refugee rights based sensitization and awareness will create a base for sustainable response. The best protection and advocacy have to come from local actors. There are proven track records local actors in this regard, CCNF is the vivid example, neither any UN agencies nor any INGOs have had come up in this regard.

4. **The report should have the reflection of May 2020 [IASC \(Inter Agency Standing Committee\) Interim Guidance on Localization and the COVID 19 Response](#).** The guidance drafted by IFRC and UNICEF and approved by IASC, the highest UN policy body in respect of humanitarian response. So, this is an obligation for all actors. Important features of the report include:
 - (a) The guideline has clearly mentioned that “local government” is a critical actor in the process of localization. The present draft LTF consultant report hardly reflected this.
 - (b) There are seven distinctive key messages, (i) safety and well-being, (ii) responsible partnership based on equality, mutual respect, mutual accountability, (iii) humanitarian principles, (iv) support local leadership and active engagement in coordination mechanism, (v) flexible and simplified funding...as directly as possible, (vi) visibility must be given and (vii) build back better with development and peace nexus through meaningful partnerships.

The guideline explicitly mentioned that **“Humanitarian leadership must be inclusive and work to support the entire humanitarian community and not only UN agencies and international NGOs which tend to be more visible”** (page 4, para 1). Further in the report it is also said that **“...should be encouraged to facilitate a more comfortable setting for local organizations to actively setting. This will include ensuring that the language of the meetings is accessible to local actors of cluster / sectors...”** (page 4, para 4).

The LTF consultant should revisit the report based on the guidelines. While even [the Grand Bargain September 2018 mission](#) recommended to introduce “Bangla” as language in Coxsbazar level. The LTF roadmap report make the recommendations more obscure and confused.

There are two national and local democratically elected NGO representatives in SEG and the participation has to be made meaningful. Since the beginning (September 2017) CCNF has been urging for participation of local and national NGO representation in ISCG and HoSoG at Cox’s Bazar level, but it has not been happened. ISCG and HoSoG leadership approach of maintaining Separate Island should be replaced with a genuine inclusive approach, especially by giving more access to local and critical actors.

5. **Localization is a political issue, a power shifting process, which fundamentally needs to be addressed within the frame of basic principles of GB, C4C and PoP commitments.** It should be noted that the TOR (Terms of Reference) of the consultant which was approved by the LTF mentioned that the Grand Bargain (GB), Charter for Change (C4C), Principle of Partnership (PoP) commitment and the [CCNF work in this regard](#) should be the primary basis for analysis. Unfortunately, the analysis reflects very little of it. The report interpreted that localization campaign has been made as a political issue. In fact, localization is considered as political issue and a matter of power game, a process to shift the power to local actors. Whereas, the whole GB is a framework in this regard, especially the stream 1. Greater Transparency, stream 2. More support and funding tools for local and national responders, and stream 6. The participation revolution. Localization means the local actors’ and affected population’s access to the decision

making process of the response management. The report hardly addresses these issues, especially there are very little reflection on stream no 1, 3, 4, 5, 6, 7, 8 (amalgamated in latest GB update), and 9. So, the report has become a mere technical report addressing the localization issue as a matter of funding and so called “capacity building” for the local NGOs.

[There are 9 streams and 51 indicators in GB as updated so far.](#) Since the beginning, CCNF has been analyzing it based on the commitments and provided opinions on what to do about it in Rohingya response. CCNF organized around 13 multi-stakeholder dialogues participated by high level policy makers from government, UN and INGOs. They published ten publications on it.

A matrix is given below on some primary suggestions to be examined by the LTF consultant

GB streams	Proposed primary action	Reasons
1. Greater Transparency	Regular publications of aid flow with disaggregated data. Single pot approach is must to avoid duplication of resources.	To enhance and promote public participatory monitoring and to give continuous strive for effectivity to efficiency.
2. More support and funding tools for local and national responders	Pooled fund and localization driver as proposed by the consultant report.	UN agencies and INGOs should lead monitoring, fund raising and technical assistance. Field operation should be implemented by L/NGOs and local govt. But the response management must be with Genuine Inclusive approach especially with the participation of local NGOs and local government. Localization is considered by the consultant as a mere technical issue.
3. Increase the use and coordination of cash based proگرامing	Enhance advocacy toward govt. for more cash/ voucher support for procuring local perishable goods (e.g., vegetables, fish and meat etc.)	Primarily to enhance local production, including salt and dry fish. Also encourage the purchasing of bio degradable local products.
4. Reduce duplication and management costs with periodic functional reviews.	Merging ISCG with pooled fund mechanism and localization driver, possibility under one umbrella / single management approach with RRRC.	As a definite reduction of aid is evident, there must be an approach of reducing the management cost. It is not necessary to maintain sub offices of international agencies in Coxsbazar. There should be common logistical pool.
5. Improve joint and impartial need assessment.	Participation of L/NGO and Rohingya CSO in periodic review and need assessment for more appropriateness.	At present only international agencies are participating in the review and need assessment by ISCG, prior to each JRP preparation. Local and Rohingya CSOs know better on appropriateness.
6. A participation revolution: include people receiving aid in making the decisions as it affects their lives.	Formal access of local govt. and L/NNGO representative to ISCG and HoSoG through democratic process. Gradually Rohingya CSO participation should also be facilitated at all level. L/NNGO participation in SEG should also be made meaningful.	Now ISCG is solely participated by expatriates, UN and INGO representatives. Even after repeated demands the participation of local govt. and L/NGO are denied. Language is a major barrier for effective participation in Cox's Bazar. Expatriates should learn Bangla and should be oriented on local culture. It was also a demand since the beginning, also pointed out as a

GB streams	Proposed primary action	Reasons
	Bangla should be made official language in Rohingya response management especially in Cox's Bazar.	recommendation in the Sept 2018 GB mission. Rohingya SHG which has proposed in this report should be turned as Rohingya CSO too.
7 & 8. Increase collaborative humanitarian multi-year planning and funding and reduce the earmarking of donor contributions.	CCNF has already initiated advocacy on medium term planning, humanitarian and development nexus in Rohingya Response and for entire Cox's Bazar district. This plan should be tailored to create economic, employment and education facilities for the district.	Present annual JRP system is an adhoc exercise. Especially in respect of shelter, CCNF proposed pre-fabricated two-story structure, higher level of education and livelihood capacity building of the refugees linked with the local market. Refugees are being integrated in the local communities in one or another way, it is hardly being stopped and it is a reality. So there should be total district planning for economic and employment opportunities.
9. Harmonize and simplify reporting requirements.	All involved agencies should have "partnership policy" tailored to promote civil society (NGO who will do advocacy and raise voice on civil rights too) with simplified and common reporting system.	

6. **Employing local staff in international agencies is not localization.** The report mentioned in page 5 and para 3 that, *"Equitable opportunity – localization must also ensure that national and local staff prioritized for employment across all agencies and levels. One early success in Cox's Bazar is that Bangladeshis already comprise the large majority of the employees, though not enough are in decision-making role."* In view of all the internationally accepted charters (e.g., GB, C4C and PoP) related to localization, employing local or national staff in international agencies is not at all part of the localization. It will distract the reader's attention from power sharing, transparency, participation, accountability to the local actors and affected population, which is the basic essence of localization.
7. **Technical Assistance or Expatriate Employment, Demand or Supply Driven:** The LTF consultant should have a comment on this, while there are comments on staffing in international agencies. Neither government nor ISCG has any accurate data on how many expatriates is working in Rohingya response. During initial period it was said that there were around 1300 expatriate in Rohingya response. We have clear [position](#) in this regard. We have some different practical experiences in this regard, while we have interacted on what should be done in respect of social cohesion, we had to challenge [some wrong interpretations being provided by a group dominated by expatriates](#). We are not against the expatriate involvement, but it should be (i) demand driven, need assessment should be done first, (ii) available local capacity / expertise should receive priority, (iii) if needed expatriate must be deployed with the clear time line based

strategy on technology know-how transfer. Time has come to talk about such a policy as it is not only to cope with the reduce level of aid and it is also need to talk about technology transfer to locals. Rohingya response cannot be or should not be depended on expatriates even after 34 months of the response.

8. **Capacity “building” fallacy, partnership policy and investment in leadership.** The report overwhelmingly emphasizes on capacity building. Sometime the report accepted the notion of capacity exchange. Here are two demystifications in respect of this capacity “building” fallacy.
- (a) Many of the international studies (especially by ODI HPG group) propose the issue of capacity convergence or exchange, accepting that the partner local organizations have also some inherent capacities like navigation through the local power structure and understanding the local culture etc. Donors / international agencies also have some necessary capacities. Both of the sources of capacities should be in convergences.
 - (b) Having capacities does not necessarily ensures to have funding or partnership with international agencies. COAST has been a [HQAI](#) (Humanitarian Quality Assurance Initiative), certified organization in Bangladesh and Cox’s Bazar for long time. HQAI certifies organizations across the world after a rigorous process of audit on CHS (Core Humanitarian Standard) and ISO 2000 standards. There are only 21 organizations who have such a certificate. Several famous international agencies are yet to be able to achieve this while some of them are still on different level on the way to be certified. So, it does not mean that COAST has got all funding. There are widespread allegation of cronyism and corruption in partnership selection process. We have observed some cases in Cox’s Bazar too. Moreover, some of the international agencies hardly want to entertain critical civil society voices which is the need of time. What is happening is the process of selecting “His Master’s Voice” and re-production of patron client relationships. Some international agencies imported NGOs from abroad and from the far opposite part of Bangladesh, who hardly represents the local people and their culture.

So, we propose the international agencies to have **“Partnership Policy” with long term vision, criteria based and must be selected through a process of transparent, competitive basis and free from conflict of interest.**

The report has overwhelming emphasize on capacity building that promotes **“Spoon Feeding” and defeats the spirit of “self-learning and self-made approach”** of gaining capacity through learning and actions.

The report should have much more importance on the selection of leadership (i) with political commitment towards refugee and human right issues, and (ii) who have natural capacity of advocacy at different level. It should be noted that there are much more need of advocacy leader and CSO/NGO who are not only efficient in service delivery but also efficient in advocacy and community mobilization. Rohingya refugees need a lot of legal and quasi legal facilities from government and also need community support for peace building and social cohesion.

9. **“We support the idea of “Pooled Fund and Localization Driver”**. We support these two ideas to facilitate localization in the Rohingya response. We have following recommendations for effectivity in this regard.

- (i) **Integration as One Body, Bangladeshi Example.** These two aspects have to be integrated as “one” body to promote local NGOs as CSO. There are examples in Bangladesh, *Manusher Jonno Foundation (MJF)*, who promotes human right and governance in the country. MJF has a lot of success in respect of policy and practice changes in the country. So far it has been funding around 150 local organizations across Bangladesh being funded by DFID, CIDA and other donors. Initially it was anchored with CARE but within 1/2 years it has emerged as independent body. It has happened mostly because of committed and experienced leadership.
- (ii) **Primary role to promote local CSOs in Cox’s Bazar.** CCFNF was advocating since the beginning for such pooled fund to promote CSO (Civil Society Organization) in Cox’s Bazar. NGO who also raise voice on civic rights, have natural capacity to mobilize local community and stakeholders should be termed as CSO, not the NGOs who only do service delivery. These distinctions have to be understood. There is a critical need of CSOs in Cox’s Bazar to promote a human / refugee right sensitive society. Due to the heavy and direct presence of INGOs and UN agencies in Cox’s Bazar since 1990, very few number of local NGOs have been established here compared to other districts.
- (iii) **Initial anchoring and Governance.** These pooled fund / localization driver should be placed with ISCG for initial period. There should not be any illusion on its anchoring with government as it has suggested by the report. UNHCR should be in its governing board, as it is the only mandated organization to take care of refugees. There should also be representation of local and national NGOs in this governing board.

10. **Hearsay cannot be the basis of inference. The report should consider a proportionate and scientific approach.** There are repeated number of negative aspects on local NGOs in the report, e.g., they are not capable, they do not maintain humanitarian principles, they have mismanagement etc. I feel these are a bit disproportionate. I have never seen such a propaganda placed in so directly in any report. The consultant listens to those both in Cox’s Bazar and Dhaka as presented as hearsay and these should have been substantiated with evidences. I am afraid that, this aspect of report will have every chance to be used for anti-localization propaganda. I have following facts in this regard.

- (i) Since 1978 for Rohingya refugees and especially after the cyclone of 1991, the local NGOs in Cox’s Bazar have been working with the partnership of INGOs and UN agencies in Cox’s Bazar. Any of such open propaganda against local NGOs have never evidenced before. Rather, there have been a number of negative evidences against INGOs and UN agencies published in media, like there are such allegations especially on corruption in DR Congo. CCFNF have never used those for any inferences.
- (ii) The fundamental fact is, since almost all of the local NGOs has been working under the INGOs and UN agencies, it is also their responsibility if any mishap occurs.

- (iii) Bangladeshi NGO/CSOs has been very active in localization campaign including PoP, GB and C4C movement both at local and international level. INGO who are not signatories of those agreements are found very active in such propaganda, most of those INGOs have succeeded in strong contract with UN agencies and strong presence in Cox's Bazar. They also did so called study to show that local NGOs are 'not respectful' to Rohingyas. This kind of study developed the inference based on four FGD, which cannot be considered as a scientific study. But, this message has been taken by this report.
- (iv) Local NGOs, including their network CCNF, have had organized at least 13 multi stakeholder consultations since September 2017 where almost all high officials of UN agencies and INGO participated. These consultations were organized not only to promote localization but also to promote understanding and inclusive solidarity to promote human right / refugee rights in Cox's Bazar and the country. Still CCNF has been mobilizing campaign and advocacy e.g., [statement with signature from local CSO, local media and national CSO for 4G internet for Rohingya Refugees in the camps](#), giving shelter and berthing facilities to boat people, [Statement condemning the anti-Rohingya approach of Malaysian government etc.](#) We hardly found any investment from any international agencies on it. So, we strongly believe that local NGOs played a pioneer role in this regard. We feel there are some agencies working both in Dhaka and Cox's Bazar, who feel jealous and are creating this kind of propaganda against local NGOs.
- (v) During the local youth movement in Cox's Bazar, some of our INGO friends in SEG alleged that CCNF campaign and position fueled that agitation. In fact, CCNF leaders are the one who gave statement in both local and [international media](#) against the movement and played important role to defuse the tension. So, there are deliberate attempt to vilify local NGO leaders.
- (vi) Please also note that, it is the local NGO leaders who systematically tried to discuss with international agency leaders in Cox's Bazar to develop reciprocal understanding. Ironically except UNHCR, none of the agency leaders have responded to the request to have meeting.
- (vii) CCNF leaders tried several times to have bilateral meeting with present ISCG leaders especially to discuss on JRP and to develop reciprocal understanding. But the requests are either avoided or turned down. In the beginning, CCNF and local NGO leaders succeeded to receive invitation and got the scope of interaction to exchange with visiting international dignitaries, but during the present ISCG leadership, this has been fully stopped.
- (viii) We have study that, local NGO involved in partnership both in camp and host community has come down to 4 to 8%. We are afraid that this could be a common systematic process to oust the local NGOs off the total response.
- (ix) There is a unit named CARU (Cox's Bazar Analysis and Research Unit) who produce weekly report synthesizing the local print and online media reports and social media postings. In the header of CARU it is said that Partnership for Tolerant and Inclusive

Society in Bangladesh. But our observation finds that, CARU reported negative news on local NGOs / CSOs and localization activists. They hardly reports positive news on them. On the other hand, they report generously positive news on the activities of international agencies. Once in a formal presentation they termed the localization campaign as alarming next to ARSA. We challenged its basis, but that was never responded. An approach of inclusiveness cannot propagate such a divisive information and conclusion.

- (x) Observation also shows that, ISCG twitter postings normally propagate good works and news of international agencies while they hardly reflect the work of local NGOs working in the camps.

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