

Congress of Local Authorities from Moldoba

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EU4Moldova: Local Communities

Nr. 70 din 8 aprilie 2020

Dlui Ion CHICU Prim-ministru al Republicii Moldova Dlui Sergiu Pușcuța Ministru Finanțelor al Republicii Moldova

Copie: Dlui Peter Michalko Ambasadorul UE din Republica Moldova Cancelaria de Stat

Dear Mr. Prime minister, Dear Mr. Minister,

To Your official request for opinion number 11/2-03/123/349 from 26.03.2020 on the EU4Moldova: Local Communities initiative, first of all, allow me to express our appreciation for sending these papers for consultations to the project stakeholders. And above all for the common efforts of the European Commission and of the Government of Moldova to address the issues and problems with which are confronting local governments from our country. As per Your request comments are formulated in English. Particularly below we will focus upon the first paper – Local Communities – as this project answers exactly to our field of expertise, involvement and operations

Allow me to mention the need for broader participation in the future of relevant stakeholders at the project document drafting stage. This will not only allow to better target the problems under initiatives, but will equally allow improving the narrative description of the problems which is leaving some space for improvement yet.

Also on the notion of participation, it would be good if such initiatives are consulted at the conceptualization and later at the design stages with relevant actors to consolidate both national and local ownership. For example, it remains unclear the transparency of the beneficiaries' selection process not only because we have found out about this initiative only from Your request, but also because the needs are everywhere quite equal and at the same time only three particular raions were selected.

In terms of inclusion and participation, to mention that the Congress of Local Authorities from Moldova as an institutional representative of the local governments from Moldova, not only was not included in any consultations related to this project, but is not even being mentioned as a stakeholder for this project. This is particularly below understanding when organizations of somewhat smaller relevance to local governance field are mentioned under the list of project stakeholders

On the positive note to mention that the activities suggested and composed from such dimensions as improvements of social infrastructure, improvements of economic infrastructure, inter-municipal cooperation, support for local action groups and consolidation of LGs capacities are all rather

important and very useful. Our reading of the project document is that all these activities in complex will be embraced for each separate community and this is extremely important since exactly in the combination of different models the local development can be achieved

In terms of implementation modality we would advise strongly in favor of the grants for each separate community focusing on the project priorities. Implementation via indirect management of selected implementation entity bears many risks and challenges as latest experience in Moldova and at the global scale indicates. First of all indirect implementation eats a lot of resources as management and expertise expenses, resources which can be spent much more productively, efficiently and qualitatively for community development. Apart from that, excessive focus on management, expertise and capacity building not only risks to seriously overlap with many other projects in the field in Moldova – past and present, but what is a way more important – it represents already a somewhat obsolete modality not bringing sustainable results and not reaching out to the population in the developing countries. Exaggeration with capacity building, knowledge transfer and technical assistance under the conditions of huge personnel turnover and under the lack of changes on the ground (policy, reforms, infrastructure, funding, etc.) for a long while already does not stimulate either local or national development.

We would advise against any territorial amalgamation approaches under this initiative as territorial amalgamation is a rather complicated and controversial subject, which shall be thoroughly discussed openly and publicly with all the stakeholders, but above all with population at-large. It is not something what can be introduced within the projects as it is as much socio-economic process as it is a political one and per the European Charter of local self-government shall be thoroughly consulted with the population (article 5. Protection of local authority boundaries)

Remain in hope that the comments above are useful and conducive to the improvements in implementation of this extremely important for local governments initiative

With highest degree of respect

Viorel Furdui Executive Director Congress of Local Authorities from Moldova (CALM)

