

**Submission to Review of the White Paper on
Irish Aid
25 April 2012**



Introduction and Summary:

Comhlámh is the Irish Association of Development Workers and Volunteers, established in 1975. Comhlámh's mission is to empower an active community to challenge and address the root causes of injustice.

Our membership is made up of many volunteers and development workers, who have firsthand experience of working all over the world, including in Irish Aid priority countries, and other developing nations supported by Ireland's aid programme. Their perspectives inform and deepen our submission. Many of our members are also people in Ireland who engage on global justice issues from home, rather than going overseas, and their critical perspectives on the root causes of global poverty are crucial too.

This submission is based on consultation with our members which included a focus group meeting and online questionnaire. It is also informed by the perspectives of our stakeholders, the civil society groups we work in solidarity with in countries of the Global South, and key allies in Ireland and Europe, in particular those that work on trade and other important global justice issues. The submission covers a broad range of issues and perspectives, but in particular focuses on areas where Comhlámh has specific expertise.

We are grateful for this opportunity to input into the White Paper Review, feel the consultation process has been comprehensive, open and productive, and think this is an opportune moment for Ireland to reflect on its relationship with the world, and its commitment to international development and poverty eradication.

Our key recommendations for this submission include:

- A successful development programme requires significant public support and engagement. Irish Aid should maintain and strengthen its support for development education and the critical engagement of people in Ireland on development and global justice issues.
- To ensure maximum impact of its programme, and aid effectiveness, it is imperative that the Irish government take a deeper perspective on the root causes of poverty and hunger. Addressing only the symptoms of these problems will not help to change them. Ireland's aid and development programme should also tackle the systemic blocks to development. It should focus more on broader policy areas which impact on development, such as trade, debt, taxation, agriculture, international finance and climate change, not just on aid.
- Irish Aid should prioritise key approaches and principles, to maximize its programmes' impact. In particular it should focus on Policy Coherence for Development, adopting a Human Rights Based Approach, and ensure all its programmes are poverty-focused and promote sustainable development.
- In the context of Ireland's new focus on trade and development, and the Africa Strategy, Ireland has a positive opportunity to become a champion of pro-poor trade policy that supports rather than undermines sustainable development and poverty eradication. Its work on trade policy and practice at national, European, and international level should prioritise and respect the principles of policy space, and policy coherence for development.

- Monitoring aid effectiveness should include a strong focus on qualitative indicators to enhance learning and understanding of long-term programme impact, and avoid an excessive concentration on quantitative information. The focus on aid effectiveness should also be broadened to include support for public engagement in development debates and support for civil society, to identify where improvements in policy coherence and other areas might contribute to development outcomes.
- Volunteering remains an integral part of development cooperation. Development workers and volunteers make a significant contribution through the work they do overseas and upon return as multipliers who promote the importance of Ireland's role in the world and a deeper public engagement in development issues. For Ireland to have a world class volunteer programme, it is important that Irish Aid continues to promote adherence to best practice standards by volunteer sending agencies (VSAs) and to support relevant structures aimed at building capacity, enhancing learning and cooperation among VSAs.

We also endorse and support the submissions of organisations and networks of which we are members, such as *Dóchas*, *IDEA*, *Debt and Development Coalition Ireland* and *Stop Climate Chaos*, and of those organisations we work closely with, such as *Trócaire*, *NYCI* and the *Africa Centre*.

1. Progress since 2006:

Significant progress has been made since 2006, on many of Irish Aid's commitments, and it is important to acknowledge this. The White Paper set out an excellent framework for Ireland's interventions globally to support development and poverty eradication. It asserted strong and broad values, principles and ways of working. These were welcomed by the development sector, and have contributed to Ireland's aid programme being recognised internationally as excellent, cutting edge, delivering above the level that might be expected of a small country such as Ireland. Ireland's commitment to non-tied aid is important, and the key principles such as effectiveness, accountability, transparency and partnership are excellent. These contribute to Ireland's strong global reputation as a key actor on development and global poverty. The cross-cutting themes and key issues, along with the focus on hunger, and on LDC priority countries, are important parts of Ireland's development programme, as is the focus on supporting civil society in programme countries.

International Volunteering:

Irish Aid has invested significant resources and support over the White Paper period to providing comprehensive information on volunteering for development and promoting adherence to good practice standards among volunteers and Volunteer Sending Agencies (VSAs), in order to maximise the impact of volunteer programmes for host communities and volunteers. The opening of the Irish Aid Volunteering and Information Centre has provided a hub for volunteer information, with many VSAs and other actors in the sector availing of the facilities to inform, discuss and publicise opportunities for the public to engage in volunteering and development. Irish Aid's support for the Code of Good Practice and Volunteer Charter has provided a strong basis for collaboration among VSAs, maximising shared learning and incentivising VSAs to improve their practices, another manifestation of Irish Aid's commitment to aid effectiveness.

Public Awareness and Engagement:

The importance of development education and its achievements in Ireland are unfortunately under-represented in the White Paper review document. For example, two recent reports, *DE Watch* and *DEAR in Europe*, recognise Ireland as a leader in the development education sector at a European level, an impressive achievement given the size of Ireland relative to other European countries.

The increased focus and strengthening of support to development education has been a key positive achievement during the White Paper period. Irish Aid has provided support to capacity building of development educators, and increasing good practice and reflection on development education policy, through support to IDEA, and other organisations. It has assisted the strengthening of development education across the country, through the important regional networks of development education centres and practitioners, and those engaging the Irish public in Dublin. Its support to non-formal development education courses and activities, and community approaches, has been key in creating important multipliers of Ireland's aid programme and commitment to global poverty reduction. The new Irish Aid Volunteering and Information centre has also provided a forum for increased public engagement in Ireland's development work.

Thus much has been achieved during the White Paper period, despite it being a turbulent, complex and challenging period for Ireland generally, which speaks to Irish Aid's professionalism and commitment. However, many of the commitments in the White Paper have yet to be fully delivered on.

Ireland's Aid Commitment to 0.7%

Of significant concern is the lack of delivery on Ireland's international commitment to reach 0.7% of GNI in its aid contributions. Ireland's commitment to reach this target by 2012 was rescinded, and over the past 3 years the aid budget has been cut disproportionately in relation to other areas of government spending, by 30% since 2008. Ireland must recommit to reaching 0.7% of GNI by 2015, and publish a timeline indicating how this will happen.

Policy Coherence for Development:

Some progress has been achieved over the period on policy coherence for development (PCD). The establishment of the Inter Departmental Committee on Development (IDCD) was a positive first step, and the investment in research on PCD was important. However the level of resources given by Irish Aid to this key area is low and the weight given to policy coherence by Irish Aid and the government in general is still insufficient. It is not entirely clear to civil society when the IDCD meets or how to engage with it. In some areas, unfortunately, Ireland's commitment to PCD seems to have decreased; for example Ireland's national trade strategy of 2005 contained a whole chapter on developing countries' needs and concerns, and Ireland's differentiated approach to them, whereas the 2010 trade strategy does not even mention developing countries once.

Trade:

Many positive achievements have occurred over the White Paper period on trade and development. There has been some strengthening of the understanding of the complex connection between trade and development. The third pillar of Ireland's international trade policy is the principle that it is formulated "respecting and taking into account the needs of developing countries". At the WTO and EU level Ireland has often taken a stance on trade policy that foregrounds the interests and concerns of developing countries, and worked with like-minded European countries to coordinate policy positions towards maximizing their development impact at trade policy discussions. This position is very positive, and has been appreciated by developing countries, such as the ACP nations involved in the EPA negotiations.

Irish Aid has invested money in Aid for Trade, although its contribution in this area has been declining recently. It has also increased its support to fair and ethical trading initiatives over the period of the White Paper. An increased recognition of the importance of trade for development has led to funding of important research on the topic, including on policy coherence issues.

However, PCD on trade and development is patchy at best, and commercial interests often trump development ones, both at EU and national level (see example above). Moreover, while sometimes taking principled pro-development positions at a global level, Ireland has not always taken specific policy lines on issues of concern to developing nations, and has sometimes undermined its own perspectives (for example ratifying EPAs in June 2010, weeks after some of its priority aid countries had declined to sign them out of concerns for development).

The White Paper commits itself to "providing support for efforts that raise awareness

around ethical trade issues”, and it would be useful to have more clarity around how Irish Aid understands this commitment. There is limited support from Irish Aid for policy, campaigns and education work on trade and development, and initiatives which promote fair and ethical trade at a more complex global policy level beyond basic concepts of 'Fair Trade initiatives'. In the context of the increased focus of Irish Aid and DFA on trade and development, there should be support from Ireland for a variety of civil society voices and perspectives on trade and development issues to ensure a rich debate occurs on the topic, and all policy areas are robustly examined.

2. Changes in Local and Global Context:

There have been huge changes in global and national contexts over the past 5 years, which must be borne in mind when charting a future for Ireland's action to support poverty eradication and sustainable development globally.

National Context:

Financial crisis and Understandings of Development and Global Poverty

The ongoing financial crisis in Ireland has a huge impact on the domestic context for Ireland's development programme. There has been a disproportionate cut to Ireland's aid budget, and there is increased public and media scrutiny of aid expenditure.

Inevitably in times of economic difficulty Ireland's aid programme will come under scrutiny. Unfortunately, the recession has led to an increase in the voicing of the 'charity begins at home' perspective. Irish Aid should play a strong role in preventing the polarisation of public discussion on aid and development, which pits vulnerable people in Ireland against vulnerable people in developing countries. Irish Aid should also communicate clearly the depth of poverty and disadvantage experienced by people in programme countries, and the responsibility of richer countries like Ireland to share a small portion of their wealth with poorer countries.

The aid effectiveness debate should be widened to encompass critical engagement by the public and understanding of the role of Western states and EU in developing policy which does not undermine the development programmes being implemented by Irish organisations. Through examining the root causes of the problems experienced in developing countries and focusing attention on problems and solutions that we have in common, rather than on our differences, we can promote a more complex, progressive dialogue within Ireland on development and global justice issues.

On the positive side, the global financial crisis has resulted in a more aware and critically engaged public and a wider engagement across the population on economic and political issues. This presents a unique and unprecedented opportunity for development education to further support people in Ireland to consider and understand global interdependence, development debates, and the issues of poverty, economic inequality and conditionality that are now affecting people across Europe, as well as developing nations.

As the consultation document notes, while public support for our aid activities is high, public understanding of the complexities of development is low. High quality development education, in formal and informal settings, can continue to address this.

International Volunteering:

Over the past 5 years there has been an increase in interest in, and opportunities for, short term international volunteering. However without sufficient resources and support being allocated, the critical engagement of such volunteers will be limited, and the great potential value these people can add to development may not be realised. The integration of development education into volunteer programmes can help ensure that volunteers have a critical understanding of the purpose of their time overseas and the wider impact they can have on return to Ireland.

At a European level, volunteer sending agencies and bodies are actively networking and sharing best practice with one another. Common trends and initiatives are developing

across Europe. For example, reciprocal volunteering is the norm in some European countries such as Norway, where it has been noted as a successful means of maximizing learning and positive impact for both senders and receivers.

The Lisbon treaty also brought about the proposal for a European Volunteer Corps, to create a body that implements the best practice principles from across the continent. The European Volunteer Corps reflects the strong interest at an EU level in international volunteering as a means of partnership building, and of developing a strong sense of global citizenship within Europe. The Irish Programme for Government has also committed to the development of a Volunteer Corps, supporting quality volunteering opportunities that are responsive and responsible in nature.

Migration and Diaspora Communities:

Over the period since the White Paper Ireland has seen further inward migration from a range of countries. Ireland should chart its future development policy bearing in mind an increasingly diverse domestic audience and consider how to engage ethnic and migrant communities to best effect.

European and Global Context:

The context has also changed significantly at a European and a global level. At a European level many countries are facing significantly reduced public budgets, fiscal austerity, and increased poverty and unemployment at home. Moreover a debate is raging across Europe about fiscal and macroeconomic policy, one which has much resonance for developing nations, who have debated and lived with the pros and cons of economic policy conditionality for decades. Europe is more focused on its own problems, looking inwards, and prioritizing European growth and recovery over development concerns. Civil society across Europe and the Global South are concerned that European policy towards developing countries, particularly in the area of trade, is becoming increasingly self-interested, with development policy becoming more coherent with trade policy, rather than the other way around.

Europe has also acted, along with other rich nations, to undermine the multilateral functioning of global institutions. The G8 is still prioritised in terms of economic and other issues, along with the increasingly powerful G20, as opposed to the UN. Over the past year there has also been a business as usual approach to key appointments at the World Bank and IMF, with the appointments respectively of an American and a European, despite longstanding demands for reform and more representation from developing countries. Just this month, in April 2012, rich Western nations are mounting a disturbing attack on the work and mandate of UNCTAD, a multilateral economic organisation which has done excellent work on trade and development over the years, prioritizing the concerns of developing nations.

Crucially, six more years have elapsed, with no sign of a deal at the WTO and conclusion of the Doha Development Agenda, launched in 2001. This has been particularly disappointing to developing countries, who were promised that this round of global trade talks would address their economic development concerns, and redress some of the damage done by the previous agreements. Important development concessions were secured at the WTO, but have not been implemented due to the lack of global will from the big economic players to conclude a multilateral trade deal. Instead the EU and other rich actors have undermined multilateralism, pursuing more ambitious, far-reaching free trade agreements with smaller groups of, or even individual, developing countries. This is

alarming, as it arguably reflects a divide and conquer approach. It is much more difficult for smaller regions to resist aggressive demands from countries that represent a key market, than the strong alliance of 130 developing nations represented by the G77 at the WTO. Developing countries are being pushed to sign up to free trade agreements that go way beyond what they are compelled to sign at the WTO.

However, the global geopolitical and economic power dynamics are also changing. The rise of the BRICS is significant, as is their increasingly assertive attempts to wield their new economic might. The increasing focus of groups of developing nations on local and regional trade is changing the global discussion on trade. Developing nations are moving towards prioritising regional integration and South-South trade, seeing the economic possibilities of trade with like-minded developing nations on potentially more equal terms.

The discourse around development is changing in response to these factors. Development actors and governments are pondering the lack of progress on poverty eradication, despite decades of aid. A simplistic assumption that economic growth equals poverty reduction is not helpful. There is also an increasing argument from the EU and others that so called “emerging economies” are fair game for competition, and should be removed from aid programmes and preferential development oriented trade access schemes. While the argument for more targeting of poorest countries is understandable, it should be made with caution, and not be used to facilitate commercial interests being masked as development ones. Even in emerging economic superpowers like India, a huge percentage of the population are living in poverty, children are undernourished, and inequality is increasing as growth rates soar.

The increased focus by Ireland, the EU, and other development actors on the role of the private sector in development should be observed with caution. The private sector is key to development and economic growth in any scenario or country, but nevertheless it clearly has a different set of motives, responsibilities, and accountability chains from government actors, or ngos.

The global financial crisis has impacted heavily on developing nations, in terms of reduced aid, trade and remittance flows. However, as the consultation paper notes, many developing countries were less negatively impacted by the financial crisis due to their more restrictive financial policies and lack of fully liberalised financial services sectors. This fact should give Ireland and the EU pause for thought about its targeting of these countries’ financial services sectors, among others, as key potential markets, and pushing for their liberalisation.

Another important area is that of natural resources and raw materials. Many developing nations, contain abundant natural resources. These countries are increasingly adopting more strategic approaches to managing these resources, attempting to learn from past mistakes and ensure that local communities and the states involved derive maximum benefit. Issues such as export taxes, production sharing agreements, supporting value addition and downstream industries, and tax avoidance and evasion by multinationals are coming up in trade and development discussions. Europe, along with other Western nations, has been proactively pursuing access to these resources in developing nations for its industries, often to the detriment of development.

Meanwhile, the global discourses and debates on development continue. Discussions have already begun around the world about the post 2015/post MDG world, and framework. It is hoped that any post MDG development initiative will take the learnings from the past decade of development, and ensure the mistakes of the MDGs are not repeated again,

while the successes are built on. Certainly, an increasingly confident and assertive civil society in many countries in the Global South and North is being outspoken in articulating expectations of governments and of the broader international community, and developing nations will insist on being more involved in discussions around their future development in the coming years.

3. Key Issues:

Hunger:

Irish Aid's work prioritising hunger has been of high quality and with significant impact. It should further strengthen this work by embedding in its programme the principles of the right to food and of food sovereignty. In this regard it should pay attention to the important work of UN Special Rapporteur on Right to Food, Olivier De Schutter. Irish Aid should also be cognisant of recent developments around commodity speculation on food and the resultant food price rise, and the impact of international investment in land and land grab issues. Finally, it should do more work on the linkages between hunger and trade policy issues, and be proactive in avoiding incoherency between Irish and EU trade and agricultural policy and its commitment to eradicating global hunger.

Climate change:

Ireland should root its perspective on climate change not just as a development issue, but as one that affects all people globally. Ireland and other rich nations must not only support climate change adaptation and mitigation in developing nations, but also must change the economic model and consumption patterns at home to genuinely tackle climate change. Comhlámh supports fully the in depth recommendations of the *Stop Climate Chaos* coalition submission, of which we are a member, on climate change and development.

Basic needs:

Ireland's future development programme should articulate its commitment to a variety of fundamental and indivisible human rights, rather than having a focus on 'needs'. It should adopt a comprehensive Human Rights Based Approach in planning and shaping future development interventions.

Governance and human rights:

The support which Irish Aid gives to civil society in its programme countries is key to the promotion of governance and human rights. Irish Aid should continue to support projects which build the capacity of civil society in developing nations. It should also set up mechanisms to ensure that it engages with civil society voices at a policy level, and pays heed to civil society policy positions, which may be at odds with those of their governments.

Irish Aid should support the capacity of developing nations to address issues which may impact on governance issues or support corruption. For example it should support developing countries' capacity and right to regulate the behaviour of multinationals, ensure that adequate benefit is accrued to the state and to local communities when foreign investment occurs, and ensure that multinational companies cannot avoid paying adequate tax on their profit in developing countries.

Gender equality:

We note with concern the fact that the one organisation working exclusively on development education and gender in Ireland, Banúlacht, has recently closed due to funding issues.

Private sector:

Over the past number of years there has been an increasing focus on, the role of the private sector in development. Obviously business, trade and the private sector often have a key role to play in generating employment and incomes for communities. However any focus on the involvement of the private sector in development must ensure that interventions from the private sector prioritise poverty eradication and sustainable development. Fundamentally the role of the private sector is to generate profit, a key goal which is sometimes in contradiction with development outcomes.

The new Ireland Africa Strategy contains much positive potential, including strengthened political dialogue with Africa, and strengthened economic interactions. It would be positive to see a strong and mutually supportive trading and economic relationship built up between Ireland and African nations. However it is imperative that Ireland Inc appreciate and understand fully the development context, and the completely different levels of economic development involved in engaging with African nations and businesses. Irish businesses can certainly share skills and expertise, and work to develop capacity. But Ireland's approach to trade with Africa should prioritise development concerns, and not Irish economic or business interests, or undermine efforts of African nations to develop their own indigenous industries.

In the past months the Minister has regularly spoken of how the Africa Strategy, and Ireland in its promotion of more trade with Africa, will promote "ethical business". It would be useful if this concept were more explicitly teased out and defined. For example, it is a matter of some concern that the Africa Strategy does not mention corporate accountability or regulation, corporate tax avoidance and evasion, international labour standards, the environmental impact of private sector activities or other mechanisms to support and promote ethical investment, such as, for example, the EITI, or the UN Guiding Principles for Business and Human Rights.

Trade and Development:

There has been significant change in Ireland's development perspectives on trade in recent years. The change of Department briefs, with the Department of Foreign Affairs taking on trade (albeit trade promotion only, and trade policy resting still with Enterprise) is an important change. There has also been the change in title and brief of what was previously the Minister of State for Development, now Minister of State for Trade and Development. It is striking that the Trade part of the brief comes first in the title.

Many in the development sector are concerned in the context of this change, and the recently published Africa Strategy, that the new focus on trade promotion might undermine Ireland's long history of principled development aid. There have been regular reassertions of the principle of untied aid from Irish Aid and the Minister for Trade and Development. However, Ireland should put in place a set of mechanisms and checks and balances to ensure that the new trade promotion brief does not undermine any development policy. Our trade policy towards developing countries, especially our priority countries, should prioritise their development needs, not Irish or EU commercial interests.

Ireland should also look to increase the amount of African products coming into Ireland, and redress the trade imbalance with our programme countries.

Any Aid for Trade initiatives which Ireland supports should be demonstrably pro poor, and should support small scale, locally focused and sustainable trade initiatives which promote and protect human rights. Such support must focus on poverty eradication, and those most in need, rather than upscaling well-established enterprises where the wealth goes to people who are already well-off, or multinationals whose trade is already well established, or prioritising securing access to resources for Western countries.

In terms of Ireland's broad policy positions on trade and development, it should promote two key principles. Firstly, Ireland should support and promote policy space for developing countries to chart out their own economic development paths. Developing countries should be allowed the same policy space to make economic policy choices that so called "developed nations" had historically. Rich Western countries should not kick away the ladder economically speaking, by compelling developing nations to agree to premature trade liberalisation, thus preventing them from protecting, developing and supporting their own industries, private sector and farmers.

Secondly the principle of policy coherence for development is also a key area where trade policy is concerned. Ireland should be proactive in seeking to avoid inconsistencies between its trade and development policies, and equally vigilant on this topic at EU level. See comments on PCD in other areas of this submission.

Ireland should restate its commitment to a multilateral approach to trading and a reformed WTO, which addresses and prioritises developing countries needs. It should advocate for the 'early harvest' proposal from developing nations.

On the Economic Partnership Agreements Ireland should restate its commitment to development agreements, which prioritise poverty eradication, sustainable development and regional integration. It should amplify the concerns of ACP countries at EU level, and work to ensure that contentious issues are addressed to ACP satisfaction in any trade deals which are signed. The countries involved should not be compelled to sign deals they believe will be detrimental to their development or policy space, and Ireland should resist any unilateral deadlines imposed by the European Commission. This, among others, is an area where Ireland can positively embark on a strengthening of its political relations with African leaders, and civil society.

Ireland should also pay heed to the newly launched negotiations towards an FTA with Vietnam, a key programme country sometimes neglected in the focus on Africa, and ensure that any trade deal signed does not undermine Vietnam's policy space or capacity to prioritise poverty eradication over trade liberalisation.

More broadly at an EU level Ireland should be an outspoken voice in favour of European trade policy that takes into account developing countries' need to prioritise poverty eradication, and doesn't undermine Europe's significant aid programme. Recent EC trade policy documents such as *Global Europe: Competing in the World* (2006) and *Trade, Growth and World Affairs* (2010) pay little heed to development concerns. More alarmingly, the EC's recently published communication on trade and development, *Trade, Growth and Development* (2012), continues in the same direction, pushing a particular model of economic development on developing nations in spite of their oft-stated concerns and excluding many developing countries from the benefits of development

oriented preferential trading agreements. The communication ignores the many submissions from EU and global civil society raising concerns about Europe's trading approach to developing nations, and opts for a business as usual approach, in spite of the ongoing global financial crisis and the questions it raises about current macroeconomic orthodoxy. The proposal to exclude many developing nations from GSP is another matter of concern.

Finally, Ireland should pay attention to two emerging areas of interest around trade and development. As mentioned previously, the area of raw materials and natural resources is a key one for developing nations. Europe, through its trade policy, and in particular the *Raw Materials Initiative*, is attempting to secure unlimited access to developing countries' raw materials. This commercial interest of Europe, and its attempts for example, to limit or prevent the use of export taxes by developing countries, could negatively impact on these countries' capacity to prioritise development, and value addition. The European Commission's new competency around investment, and its addition to the trade policy mandate, should also be watched with caution in terms of its development impact. Many developing nations have declined to negotiate liberalisation of investment with the EU and they should not be compelled to do so. Moreover the EU, or Ireland, should not be pushing for the reduction in developing countries' capacity to regulate foreign investment in their own country to prioritise development, poverty eradication, or environmental concerns, among others.

Debt and Taxation:

Debt and taxation are key issues which impacts on developing nations' capacity to move out of poverty. Comhlámh fully endorses the more detailed submission made by *Debt and Development Coalition Ireland*, of which we are a member, on the topic of debt and taxation and development, and the policy positions therein.

Given the limited resources and the need to focus these, which issues should the Government prioritise in its future aid programme?

The government should prioritise addressing the root causes of the key issues mentioned, and the complex way in which different issues are interlinked. For example the insistence on liberalisation of investment policy, brought about by EU and Irish trade policy, could potentially support large multinationals to undermine environmental sustainability and labour rights in developing nations during their operations. This could in turn lead to displacement, increased hunger, and increased corruption and governance issues. The liberalisation of investment policy could bring about a lack of capacity to regulate investment by developing countries in the public interest, and to ensure adequate economic benefit to the local community and host nation (see *The New Resource Grab: How EU Trade Policy on Raw Materials is Undermining Development*, Comhlámh, 2010 for more information). This is just one example of many areas in which different policy issues are connected.

It is thus imperative that the Irish government in its efforts to contribute to poverty eradication pay careful attention to joining the dots between different topics and policy issues, and think through the full implications of any policy choice in advance. Policy coherence for development, and not working in individual issue-based silos, is hugely important here in terms of ensuring that development impact is not undermined by other policy areas.

Moreover, adopting a restricted approach of choosing particular issues over others is not necessarily more effective. The uniqueness of country and community specific needs is paramount, and there is no one size fits all approach to development, at micro, meso or macro level. Irish Aid should remain flexible in its development practice, and adopt a bottom up approach to designing, adapting, and monitoring and evaluating development interventions.

4. Ways of Working:

Development Education: Public Engagement and Understanding of Complexity of Development:

Comhlámh believes that public engagement and participation from Ireland in development issues is hugely important, and feels that this was limited in its inclusion in the previous White Paper. Irish Aid should promote a model of development that recognises the interdependence between Ireland and the rest of the world. It should support a deep and critical engagement and learning about development for people in Ireland, and the role all people can play in addressing the root causes of global poverty and injustice through a range of activities, from practicing ethical consumption, to awareness raising, campaigning, advocacy and other actions.

As a development education organisation we believe passionately that development education and greater engagement with development and diversity is crucial to ensuring a longer term commitment to an aid programme based on the values of partnership and justice, rather than charity. A development education approach should be mainstreamed across different aspects of the Irish Aid programme. To help eradicate poverty, it is imperative to activate people in Ireland towards attitudinal and behavioural change. Irish Aid should see the key role for quality development education to engage the Irish public in learning about the complexity of development issues and global poverty, leading to increased support for Ireland's commitment to sustainable development and poverty eradication.

The move to strengthen the development education component in the formal sector is welcome, and will help to increase the reach of development education activities. However such strengthening should not happen to the detriment of the existing development education infrastructure of non-formal development education organisations, who have a long track record of quality work which is embedded in the framework of principles and rights inherent to development education as a process. Development education should not be reduced to a curricular addition which is premised on information sharing or awareness-raising, while ignoring behaviour or societal change. Development Education should take place in a policy environment which provides clear long term support for education for social change and which includes openness to accepting the proposals and criticisms of civil society towards policy being developed by Irish Aid or the Irish government where it negatively impacts on development.

Irish Aid should continue to support sectoral collaboration and strengthening of development education, through IDEA as the sector representative body. It should also support the policy work of IDEA and other key development education organisations, and increase research funding for development education work. Irish Aid should respect the right of development educators to form and work to their own definition of development education, and not interfere to narrow civil society space by restricting support to campaigns, advocacy and action parts of development education, which are a key part of the development education continuum. Irish Aid should also strengthen the recognition and credibility of development education approaches by promoting and supporting them across a spectrum of educational spaces.

The Development Education Advisory Committee set up in 2003 following the recommendations of the Ireland Aid Review Committee holds the potential to provide the Department of Foreign Affairs with robust advice on policy relating to development

education in Ireland. However, this has been underutilised recently and communication between Irish Aid and the development education sector in Ireland requires review in order to ensure full transparency and accountability, enabling the Irish public to deepen their understanding of the root causes of global injustice.

The Role of Development Workers and Volunteers:

Public engagement relies on maximising the capacity of individuals who are well-positioned to take action and implement ideas for development progress. Volunteers and development workers should be regarded as a key constituency, being a unique cohort of Irish society that can act as key multipliers of Ireland's development work in broader Irish society and promote Ireland's work on development and global justice issues. Irish Aid should allocate sufficient funds to facilitate a tiered approach of supports to volunteers and development workers, to ensure their continued engagement and enable them to become channels for increasing public ownership of the Irish Aid programme.

Initial supports include the provision of adequate placement debriefing that incorporates a focus on both the personal and operational aspects of overseas placements. Through this, volunteers can reflect on their experience, share learning, improve programme practices, and help to avoid the perpetuation of negative stereotypes about life in developing countries, which would hinder the broader understanding of the Irish public of development issues. Debriefing also enables the mental health and emotional needs of volunteers to be addressed, which may otherwise hinder their onward engagement, and allows for referral to professional counseling support if required. It is important that VSAs are incentivised to prioritise allocation of resources to meet their obligations in this regard.

Research has shown that international volunteers as a constituency group are more likely to volunteer in their communities upon return. It is important that supports are also therefore provided to enable volunteers to use the skills and knowledge gained overseas to positive effect at home. The adoption of a development education approach, particularly with short-term volunteers, can help to maximise volunteers' learning and understanding of their time overseas. In addition skills development programmes, information provision and the creation of networks, can facilitate the onward engagement of volunteers who often otherwise struggle to find relevant channels for their interest. Many returnees go on to play key roles in the development sector, or in other professional areas, bringing their overseas experience with them throughout their life. It is thus imperative that Ireland continue to support its returning volunteers and development workers in order to reap the longer term benefits of their engagement.

Best Practice in International Volunteering:

Significant progress has been made in supporting VSAs to recognise the importance and seriousness of their obligations to volunteers and host communities. Into the future there is further scope to deepen the level of engagement by VSAs, to monitor implementation of good practice standards more closely and bring VSAs above the defined minimum standard levels through capacity building initiatives. Ensuring a broad segment of society has access to volunteering opportunities and that relevant training and supports for volunteers are provided, will strengthen the contribution volunteering can make to development, at home and overseas. A focus on quality versus quantity of volunteer placements is of paramount importance, based on solid partnerships.

Irish Aid should also consider building on its work on international volunteering through giving more support to different volunteering modalities such as reciprocal volunteering and diaspora volunteering, which are becoming more mainstreamed across Europe. Supporting organisations who offer opportunities for more activists/development actors from the Global South to come to Ireland would be a very worthwhile step in setting a trend for reciprocal volunteering and mapping the greater benefits of supporting the opportunities for development actors to come here, to bring learning back home and allow us to likewise learn from them.

Engaging Migrant Communities:

Irish Aid should work with local migrant communities in its future development policy. It should explore how it can work with migrant communities who have left home (possibly to avoid poverty), who are up skilling (and are in a position to transfer these skills back home) and working (and thus *continuously* sending money back to their local communities). Irish Aid could invest in programmes where returnees and local immigrant communities work together to inform policy makers and to raise public awareness and deepen public engagement in development issues. It should also support these communities to engage in development policy fora into the future, and consider setting up internships targeted specifically at Global South communities in Ireland.

Trade Justice:

See previous comments on trade. Given the Department of Foreign Affairs and Trade's new trade promotion responsibility, and the new focus on the links between trade and development, Irish Aid should consider increasing its policy capacity on the complex connections between the two issues. It should also sustain and ideally increase its support to existing policy and education work on trade and development over the coming years.

Policy Coherence for Development:

See previous comments on PCD. Policy Coherence for Development, and a whole of government approach to development, should be a cornerstone of Ireland's development policy.

Aid Effectiveness:

Irish Aid should work with organisations to support them to improve their effectiveness, as it improves its own. It should not focus only on narrow numerical indicators in an effort to demonstrate results. Irish Aid should also look for qualitative indicators, and take a long view of development projects. It should not simply reject areas of work where the impact is harder to measure, as they may be crucially important.

Aid Predictability and Strengthened Financial Planning:

Aid predictability is a key aspect of aid effectiveness. If aid partners in priority countries, or indeed in Ireland, are uncertain about their funding allocation, it makes it extremely difficult for them to plan their activities, or be effective. In order to support the aid effectiveness efforts of its development partners, the partnerships between Irish Aid and the organisations it funds would benefit from a more long term approach to funding. A more structured and clear funding timeline for discussion and approval of funding, provided in advance to organisations involved, would support appropriate planning. Late funding allocations significantly undermine the effective work planning of organisations, and a more structured approach would support increased aid effectiveness.

Transparency and Accountability:

Irish Aid should continue and strengthen its promotion of transparency and accountability as key principles of Ireland's development programme and policy. It should support its partners to be fully transparent and accountable. It should also increase its own transparency, particularly around policy stances and positions.

Support to Civil Society - Globally and in Ireland:

Irish Aid should continue to support civil society globally to engage with and hold their governments to account, and to offer alternative policy perspectives. It should strengthen its capacity to, and process of, consulting civil society in developing countries to ensure aid effectiveness and strong partnerships. For example, in June 2010 while the Tanzanian Trade Coalition called on the East African Community not to sign the EPA (which it didn't), the Irish government put the very same agreement to the Dáil for ratification.

Irish Aid should also apply the principles of its civil society policy to civil society in Ireland. It should support a globally engaged civil society to flourish, in order to ensure that development concerns are raised at an Irish level on policy-making processes, even where civil society has different policy perspectives than Irish Aid. It is crucial that an informed and diverse debate takes place on development policy to ensure its effectiveness, and Irish Aid should not restrict civil society voices in Ireland or elsewhere which take different perspectives from itself.

Public Engagement:

See previous comments on public engagement and ownership, and development education.

Bottom Up not Top Down:

Irish Aid's approach to designing and implementing projects, in programme countries and in Ireland, should be based on a bottom up, grassroots perspective. It should be flexible in its priorities, and listen to impacted communities, when deciding on and evaluating funding and projects.

Being a Development Champion at EU and International Level:

Ireland should continue and strengthen its role as a principled, pro-development voice internationally through its membership of the EU, UN, WTO, IMF, World Bank and other multilateral institutions and alliances. In particular it should proactively promote prioritising development, and PCD, at European level, given that so much EU policy impacts so significantly on developing countries.

Partnership:

The principle of partnership is very important as a positive central value to embed in Ireland's development work. Irish Aid should fully respect its partner's professional expertise, capacity and policy knowledge. Partnership agreements (compacts) have been developed and implemented for example across the UK, and may be drawn on as examples for Irish Aid.