



EUROPEAN UNION

COMITE D'ORIENTATION ET DE SUIVI-COTON
(COS-COTON)



ACP GROUP OF STATES

**MINUTES OF THE 13TH MEETING OF THE STEERING AND
FOLLOW UP COMMITTEE OF THE AFRICA-EU PARTNERSHIP ON
COTTON (COS-COTTON), 06 July 2010**

Brussels, 6th May 2010

1. The Steering and Follow-up Committee of the Africa-EU Partnership on cotton (COS-cotton) held its thirteenth meeting at the ACP house in Brussels on July 6th 2009.
2. In the absence of the COS-cotton Chairman H. E. Kadré Désiré OUEDRAOGO, the Ambassador of Burkina Faso, who was unable to attend due to prior commitments, Mr. Viwanou Gnassounou of the ACP Secretariat chaired the meeting. The Vice Chairman, the EU member state representative (France), was also unable to attend. The list of participants is annexed to these minutes (Annexe 1).

Item 1 – Adoption of the Agenda

3. The agenda was adopted.

Item 2 – Approval of the minutes of the 12th COS-cotton meeting of March 20th 2009

4. As there were no amendments, the Chairman concluded that the minutes of the 12th COS-cotton meeting were adopted.

Item 3 – Consideration of proposals for a revised EU-Africa Partnership Cotton Action Plan

5. The Chairman recalled that the objective of the Action Plan was to lay down the main principles of the Partnership, in order for it to serve as a «framework document » for the countries and regions that are its focus.
6. The CU presented an outline of the revised Action Plan. The revision was carried out by the COS-Cotton Secretariat taking on board discussions at the last COS meeting and the mid-term review of the AAACP Programme. The main aim of this revision is to give greater visibility to the Partnership and translate it into concrete aims and expected results. The specific objective of the Partnership is « the sustainable improvement of competitiveness, added value and viability of African cotton sectors, by optimising the impact on producer income ». The general aim is to « contribute to agricultural development and poverty reduction in African cotton-producing areas ».
7. There are 6 new strategic priorities presented below, each one corresponding to fields covered by the initial action plan.

Initial Theme	New Theme
Field 2 : « National and regional strategies »	Improvement of the ability to formulate, monitor, evaluate and update national and regional cotton strategies
Field 3:« Policies & institutions».	Improvement of the institutional environment, internal organisation and efficiency of cotton sectors
Field 4 : « Technological Innovation» and Field 1 :« International	Improvement of the competitiveness of African cotton sectors through both internal competitiveness factors (technological innovation and increased productivity)

Trade »	and negotiations to bring about subsidy reduction by cotton-producing developed countries
Field 5 : « Risk Management and Finance »	Reducing the vulnerability of cotton sectors
Field 6 : « Chain Integration»	Increasing added value (AV) generated by the cotton sectors
Field 7 : « Coordination »	Improvement of international, regional and national coordination

Two categories of needs have been identified:

- Specific support for cotton, through Family farms (system approach).
- Indirect support for facilitation of producer exit through retraining, by ensuring that funding is available.

8. The revised action plan is based on several principles:

- Participatory planning;
- Adherence to the « 3 C's rule » : consistency, complementarity and coordination ;
- The Paris Declaration on Partnership, which calls on donors to align their support with result-oriented strategies and resource management; (cf. the new logical framework approach proposed in the revised Action Plan) ;
- Promotion of a regional approach;
- Geographical breakdown of support: more should go to West and Central Africa without neglecting the needs of East and Southern Africa ;
- The role of the AAACP Programme, especially in supporting the process of sustainable development of a cotton strategy in West and Central Africa and in East and Southern Africa.

9. The proposed duration of the revised Action Plan is five years, starting from 2010. The next evaluation of the Partnership will be in 2015. Biannual monitoring of the Action Plan is recommended.

10. The question of funding for the Action Plan was discussed. Resources will start to dry up as from the 10th EDF. It would be expedient to bring together all actors, including donors but also regional bodies such as WAEMU and a number of banks, to consider potential funding.

11. The Action Plan was presented in two forms, i) In the logical framework approach form with indicators (not yet decided, and still to be endorsed) and ii) in the form of « expected results » based on the revised Action Plan's strategic priorities.

Participants' reactions and comments

12. The EC/DEV representative questioned the « newness » of the revised Action Plan (AP) saying that the consultant's study had proposed six strategic priorities and the Plan only recommended 4. As there were so many priorities it would be wiser to refer to a « framework for actions » rather than a detailed « action plan ». The CU indicated that the AP did in fact seek to provide a framework for future actions. The CU was not convinced of the need to reduce the number of strategic priorities as it was of the view that the workshop did not endorse that specific recommendation by the consultants and that it was crucial to present the various aspects of the partnership as individual strategic priorities.
13. The DG/DEV representative added that « trade » was not adequately reflected in the strategic priorities. The « trade » aspect appeared focussed on African States capacity to participate in WTO type negotiations, and did not adequately reflect needs in terms of trade instruments and market knowledge to enable Africa to strengthen its ability to participate in international trade. The CU would strive to better highlight problems of market access and direct relations between African actors and the international market, although it considered that this was already dealt with under « internal » competitiveness.
14. The representatives of Burkina-Faso and AProCA noted that issues of research and poles of excellence, raised during the validation workshop, were not sufficiently underscored in the revised Action Plan. Less emphasis had been placed on capacity building for producers and risk management instruments.
15. The ACTIF representative was of the opinion that the AP is not realistic because it failed to consider the varying levels of privatisation of cotton companies in West and Central Africa and East and Southern Africa. A breakdown of the situation in these two regions would allow for a more objective assessment of results.
16. He further recalled that it is essential to capitalise on actions already underway in the field (e.g.: USAID is very active in ESA). The CU stated that application of the 3 C's rule meant that it was implicit that donors in the field were taken into account.
17. It is also important to consider the use and marketing of cotton by-products, particularly cottonseed.
18. The ACA representative reiterated the importance of supporting strategic priority 1. He appealed for funding for the technical committees being created by the ACA since the Arusha meeting, that aim to enable exchanges between the various African cotton companies in various areas (agro-

economy, ginning, transport, grading, marketing, etc.) to foster networking, which will strengthen the ability of actors to formulate strategies. This activity is entirely in line with strategic priority 1.

19. He went on to say that the revised Action Plan did not take into consideration agricultural risks (rainfall, health, malaria, etc.). The only risk management considered was linked to price risks. The CU took note of this comment.
20. The ACA representative gave participants information on capacity building within his permanent Secretariat, for it to be better equipped to carry out its coordination role, and he stated that ACA and AProCA were in the process of signing a special partnership agreement.

Recommendations and decisions for action:

21. It was agreed that in order to better reflect the long term objectives of the partnership, the title 'Action Plan' should be changed to « Framework for Action ». Regional strategies could then be based on this Framework for Action.
22. Comments made during the discussion will be incorporated into the revised framework for action in order to have a document for the consideration of participants at the 15th July meeting at the latest. In order to better demonstrate its 'additionality', it is recommended that the revised framework for action should reflect the major Partnership actions already carried out, underway or programmed.

Items 4 and 5 – Consideration of the Secretariat's note on the proposed reorganisation and decentralisation of the COS - budgetary implications

Items 4 and 5 of the agenda were taken together.

23. This issue is closely linked to strategic priority VI of the revised framework for action that deals with coordination. COS decentralisation will strengthen links with regional actors to ensure better information dissemination and coordination.

The CU explained the three possible decentralisation options:

- COS-Cotton decentralisation within ROs ;
- Establishment of a decentralised regional technical office in Burkina Faso;
- A combination of the two options. There was a proposal to strengthen the monitoring role of ROs by improving their capacity and also by providing them with long-term support from the Programme.

Discussions provided the opportunity to examine support for existing coordination mechanisms (East and Southern) and those in the process of being set up (West and Central Africa) as opposed to technical assistance right now.

24. Creating a direct dialogue between actors in the field and the COS is being considered to deal with communication and information needs.
25. The CU recalled the fundamental importance of ensuring long-term decentralisation. The COS must seek support mechanisms for the period after the AAACP, which has a limited time frame.
26. The CU distributed a sheet with the budgetary implications of decentralisation to participants. See Annexe 2.

Reactions and Comments:

27. The ACA representative felt that the proposal to allocate almost 40% of the budget to the recruitment of a decentralised international expert was disproportionate. Furthermore, he felt that recruitment of actors in the field was more effective. He believed that a less costly alternative would be to consider decentralisation within ACA or AProCA. He expressed a clear preference for support: (i) for the five technical committees (Agronomy, Ginning, Transport, Metrology, Trade and market knowledge, ACA Strategic Development) being set up by the ACA, as long term bodies within its structure but which could also be used to formulate the WCA Strategy; (ii) A partnership agreement between ACA and AProCA which is currently being considered by the two structures.
28. The ACTIF representative indicated that local capacity had been built in the ESA region. Bodies responsible for coordination had already been identified. ESA is ready for the immediate implementation of coordination.
29. The EC/AIDCO representative stressed the need to distinguish between the situations in East and Southern Africa and West and Central Africa. In ESA the strategy had already been designed and there was an urgent demand for coordination. It seemed therefore appropriate to start operations without further delay.
30. The Burkina-Faso representative called attention to the fact that during the validation workshop a consensus had emerged, in his view, on the decentralisation method, which would imply setting up a coordination structure in West Africa and another in East and Southern Africa. He felt, therefore that it was unnecessary to consider new options.
31. The Chairman corrected this understanding by Burkina-Faso: the consultant's recommendations from the validation workshop were proposals sent to the COS-Cotton Secretariat; the Chairman of the 12th meeting concluded that the Secretariat was to consider these conclusions in the light of decisions and recommendations emanating from this 12th meeting.

32. The DG/DEV representative noted the need to postpone setting up technical assistance and wondered whether action was not best focussed on capacity building for coordination mechanisms, to allow actors to work together. He wanted to know the state of progress of coordination mechanisms. He added that the ROs in the field seemed to be in the best position to coordinate activities and that the proposal to create new structures in each region would cause duplication of efforts and financial resources.
33. EC/DEV and ACTIF representatives expressed their readiness to support any form of decentralisation that would strengthen the role of ROs and ensure long term coordination, and indicated that the costly recruitment of technical assistants was not their preferred choice.
34. The COS-cotton resource expert considered it premature to put in place technical assistance and define decentralisation modalities at this stage for West and Central Africa because cotton sector strategies were still in the design phase (to be finalised by the end of 2009) and actors were still in the process of setting up coordination mechanisms. He felt that support for these coordination mechanisms, rather than the provision of technical assistance, would encourage ownership of strategies. He explained that the current thinking and ongoing actions at the ROs were moving towards three coordination levels: (i) national level, using the existing West African focal points, notably in ministries of industry, which will have to be expanded to include joint trade associations and Agriculture and Trade ministries, to be more representative of the sector (the same pattern could be copied at national level in Central Africa); (ii) regional level, a strategy formulation committee already exists in both West and Central Africa made up of the WAEMU Commission, CEMAC, ACA, AproCA, CORAF, BOAD and national joint trade associations (other regional actors who would like to will be allowed to join this committee) ; (iii) technical panels level, made up of experts from regional professional organisations of the ACA, APROCA and from the two Committees to provide input for the strategies. These technical panels share common features with the ACA technical Committees, but can only be defined in the light of the Cotton-Textile & Clothing value chain, validated by the actors. In reply to the Chairman, he specified that: the Technical Committees referred to by the ACA fall within the framework of coordination mechanisms and that they largely cover the Cotton- Textile and Clothing value chain; (ii) the forthcoming West and Central Africa consultation, scheduled to take place at the end of September/start of October plans to validate coordination mechanisms, particularly the national focal points approach, the establishment of technical panels and the definition of their work programme.

Recommendations and Decisions for Action

35. Decentralisation must take account of the most effective existing structures in the field. The most appropriate coordination mechanisms are being identified during the design and implementation phase of the regional cotton strategies; participants all felt that instead of specific technical assistance right now, support should be given to these mechanisms already existing (ESA) or in the setting up phase (WCA). They were, however, not against the principle of technical assistance.

36. A distinction should be made between the situations in West and Central and East and Southern Africa. It is recommended that discussions with COMESA AND ACTIF start as soon as possible for East and Southern Africa in order to: (i) identify support needs and coordination costs bearing in mind the structure's sustainability (ii) implement the strategy formulated by the region. This proposal should be submitted by the end of July.
37. The recommendation for West and Central Africa is that the CU, as COS Secretariat, works with ITC, which is responsible for the strategy development process, to formalise support needs for the coordination mechanisms and to propose a working timetable. A proposal must be made to the COS before the end of July.
38. Lastly, West African decentralisation should be carried out within the most appropriate organisations. To clarify this, the chairman emphasised that support for Burkina-Faso on coordination must be considered as a proposal from the consultants. The COS Chairman has asked for this proposal to be assessed in order to decide on the place and mode of coordination required once the strategy is defined.

Item 6 – Consideration of intervention proposals linked to the cotton sector submitted by international organisations in the framework of phase 2 of the AAACP programme.

39. The discussion aimed at reaching a consolidated COS-Cotton position in preparation for the Programme Steering Committee meeting on July 22nd 2009. The CU received 14 intervention proposals linked to the cotton sector representing a total of 11.3 million Euros. The document presented showed a breakdown of proposals by region and international organisation. Proposals were analysed on the basis of eight criteria determined during the AAACP mid-term review. CU recommendations organised them into three categories based on the extent of their links to the programme: strong, medium, weak. Ten proposals representing a value of 7.3 million Euros were considered acceptable (strong and medium recommendation). When added to interventions funded under the 1st phase, the total was 15.5 million. This amount is in line with the programme objectives of allocating a third of resources to cotton. These amounts will be adjusted to reflect proposals that are accepted or rejected by the next Programme steering Committee.
40. IO intervention proposals were considered point by point. Discussion results and final recommendations can be found in Annexe 3.

Item 7 – State of progress of the cotton component of the AAACP

41. The CU indicated that it was informed by the CFC that there was no progress to report on: the situation remains as described in the update of the month of March; Similarly, FAO had submitted the same document as in March. However, new half-yearly reports should be available as from the day after this meeting.
42. The EC/AIDCO representative expressed concern that the WB had not submitted a report, both in March and now. This was a matter of concern considering that the WB had received substantial funding from the AAACP.
43. The UNCTAD report stated that the workshop scheduled to take place in Cotonou in June 2009 had been postponed to October 2009. The DG DEV representative expressed the desire to have more information on this meeting, especially on its link with the AAACP programme.
44. The DG AIDCO representative noted that the UNCTAD report was inconsistent as it should be giving account of past activities but, by referring to the October 2009 meeting, it reported on a forthcoming activity, which, furthermore had never been subject to the AAACP steering committee's approval. The DG/DEV representative also wanted to know the reasons for the delay and reprogramming of activities scheduled to take place in Côte d'Ivoire.
45. The CU confirmed that the UNCTAD activity (Cotonou cotton meeting) had never been submitted to the Steering Committee for consideration, and that it would ask UNCTAD to clear up the misunderstanding.
46. The COS expressed its appreciation for the ITC activity which involved putting African producers in contact with export markets (e.g.: Thailand, end of June 2009) so they could meet consumers (Thai processors) of African cotton. However, the AProCA representative, who took part in that mission, expressed the hope that, in future, AProCA would be invited to participate in the selection of producers taking part in such missions to ensure a better representative spread.

Item 8 – AOB

47. The COS-cotton secretariat has been invited to and plans to attend the 68th plenary session of ICAC in Cape Town in September 2009. It is expected that the COS will be granted speaking time. Members welcomed participation in this meeting as an opportunity for COS-cotton to express its views. APROCA or ACA could also represent the COS-cotton or, failing that, an ICAC member state from the ACP. The chairman was pleased to note that this participation would provide an opportunity to give information on EDF support for « instrument testing », through CFC activities. However, as was the case last year, given the COS's limited resources, a request must be put to ICAC/CCIC to exempt the COS from registration fees and to ensure that speaking time would indeed be granted.

48. As they had come to the end of the agenda, the session chairman thanked participants and noted that COS decisions on IO proposals under Phase II of AAACP would be sent to the programme steering committee and IOs.

Annexe 1 – List of Participants

Name	Organisation
COS Cotton members	
Ahmed Bachir Diop	ACA
François Traoré	APROCA
Fredrick Okoth Kongongo	ACTIF
Camilla La Peccerella	CTA
Viwanou Gnassounou	ACP Secretariat
Melanie Bride	EC/AIDCO
Willem Olthof	EC/DEV
CU/AAACP/ COS Secretariat	
Pierre Berthelot	CU/AAACP
Jean-Yves Hansart	CU/AAACP
Laurence Guigou	CU/AAACP
Fabio Berti	CU/AAACP
GB Dagnon	COS-Cotton resource expert
Carole Lallemand	EMG –Emerging Markets Group

Annexe 2: “Technical Assistance ” Budget for redeployment to coordination mechanisms

COS 13.05 July 3rd 2009

COS Budget

	Unit	Unit. No.	Unit Price	Total
I. FEES				664,050
Decentralised Expert	M/M	21	16,450	345,450
Short Term Experts	M/M	12	11,100	133,200
Communication Expert		12	15,450	185,400
II. REFUNDABLE				466,000
11.1 International Travel		48		90.000
COS Travel	Round Trip	12	1,500	18,000

Focal points Travel	Round Trip	36	2,000	72,000
II.2 REGIONAL TRAVEL focal points		42		66,000
Take up and vacation of 1+5 posts	Round Trip	1,000		18,000
Focal points Travel	Round Trip	24	2,000	48,000
II.3 PERDIEM		1,200		120,000
Perdiem COS	Night	60	200	12,000
Perdiem Decentralised expert	Night	240	200	48,000
Perdiem focal points	Night	180	200	36,000
Accommodation allowance decentralised expert	Month	720	33	24,000
II.4 Other expenses				190,000
Webmaster for 2 years	Contract	1	60,000	60,000
Donors Meeting		1	100,000	
COS meetings (translations, lunch...)		6	5,000	30,000
TOTAL I+II				1,130,050

Annexe 3 – COS-Cotton conclusions on cotton sector intervention proposals submitted by IOs under AAACP phase 2

CODE	REGION	IO	Proposal Title	Comments and Questions
2.ACP.D01	ACP	WB-SDN	Capacity-building of cotton farmer organizations	<ul style="list-style-type: none"> ▪ Possible overlap with AFD and FAO activities ▪ Web based communication platform component does not take account of similar activities of other donors (e.g. FSP, « EU Africa Partnership Regional Approach»)¹ ▪ No mention of the link with the Cotton Action Plan ▪ No mention of the UdC. ▪ Unclear definition of Planned activities. <p>COS CONCLUSION : WEAK</p>
2.ACP.D02	ACP	WB-SDN	Improving Poverty Monitoring Systems for Cotton Sectors	<ul style="list-style-type: none"> ▪ What were WB results for similar projects? ▪ The budget seems low in comparison to desired results ▪ No Capacity Building, but still another study ▪ Links with the French project « SIRC »? ▪ Relevant if it leads to « SMART » IOV that contribute to assessing the impact of the Cotton Action Plan <p>COS CONCLUSION: WEAK</p>
2.ACP.D03	ACP	WB-SDN	Analysis of cotton farming systems and implications for sector policies and design of support programs	<ul style="list-style-type: none"> ▪ Would fill a genuine information vacuum; should take account of existing studies (e.g. Mali, Burkina); ▪ Logical follow up to case studies funded under Phase 1 ▪ Synergy with WB project in Uganda ▪ Possible co-funding ▪ Request that the WB link up with FAO & CFC <p>COS CONCLUSION: STRONG</p>
2.CEN.B03	CEN	ITC	Implementation of regional cotton sector strategy: Increase capacity in cotton trading, marketing and promotion	<ul style="list-style-type: none"> ▪ Clearly defined activities ▪ Relevance of some of these (e.g. organic cotton???) in the light of what other donors are doing. ▪ Clarify budget (in relation to phase 1, and similar activity in West Africa) ▪ Review proposed budget to give priority to support for consultations and focussing on a smaller number of activities??? ▪ Provide greater clarity on stakeholder consultation support resources for the review (formulation) process and implementation of a West and Central Africa WCA cotton strategy.

¹ See Document « Update of the EU –Africa Partnership on Cotton », pages 29-30, « ...improved sectoral information management, notably through setting up a data base within AproCA and creating a regional cotton information system structure. »

CODE	REGION	IO	Proposal Title	Comments and Questions
COS CONCLUSION: STRONG, subject to clarification of budget and review of some components				
2.ESA.A01	ESA	FAO	Enhancement of the supply of cotton and complementary diversified products (cotton by-products and cotton rotation crops) to the market	<ul style="list-style-type: none"> ▪ Even though it is based on the COMESA cotton strategy there is an inconsistent grouping of activities scattered over several countries, with 22 interventions proposed (9 on capacity building) in 4 countries (see: MTR recommendation) ▪ Very high Budget required (3 million € with no detailed breakdown per intervention). ▪ No supporting arguments on choice criteria 2,3 and 4
COS CONCLUSION: NOT RECOMMENDED				
2.ESA.B03	ESA	ITC	Implementation of the regional cotton strategy	<ul style="list-style-type: none"> ▪ Clearly defined activities, rooted in the logical follow up to Phase I. ▪ NB. Is COMESA cotton strategy support assured?
COS CONCLUSION: STRONG				
2.ESA.C02	ESA	UNCTAD	Promoting the development of warehouse receipt systems for cotton sector in ESA	<ul style="list-style-type: none"> ▪ Innovative? ▪ What happened with a similar project under Phase 1? ▪ Vague Proposal for study and inventory: unacceptable at this stage of the Programme ▪ Proposal linked to the next on a cotton exchange, rejected by the COS
COS CONCLUSION: NOT RECOMMENDED				
2.ESA.C03	ESA	UNCTAD	Feasibility study on the viability of a regional cotton exchange in East and Southern Africa	<ul style="list-style-type: none"> ▪ Does not appear as a priority intervention field in the recently updated COMESA cotton strategy
COS CONCLUSION: NOT RECOMMENDED				
2.ESA.F01	ESA	CFC	Improving Cotton Production Efficiency in Small-scale Farming Systems through better vertical integration of the supply chain	<ul style="list-style-type: none"> ▪ Not yet approved by CFC Board but supported by ICAC. ▪ Substantial Co-funding (CFC direct contribution: 385,000 €) ▪ Seems to be more in the remit of the FAO. ▪ Need to ensure that the duration of the project (or some of its components) is in line with the 3ACP.
COS CONCLUSION: MEDIUM, check whether components can really be concluded by the end of 2011				
2.WST.A01	WST	FAO	Improve income, environment and health of cotton producers through capacity building and policy support on IPPM and integration in VC	<ul style="list-style-type: none"> ▪ Consistent proposal with well defined activities. ▪ Clearly articulated links with the Action Plan and Phase 1. ▪ Risk of overlap with CEMAC and WAEMU projects.
COS CONCLUSION: STRONG (????)				

CODE	REGION	IO	Proposal Title	Comments and Questions
2.WST.B04	WST	ITC	Implementation of regional cotton strategy: Increase capacity in cotton trading, marketing and promotion	<ul style="list-style-type: none"> ▪ Follow up to Phase I on which activities will be based. ▪ Synergy with CFC and WB on some components. ▪ Link with UdC to be determined. ▪ Provide greater clarity on stakeholder consultation and coordination mechanisms support resources for the formulation and implementation process of a WCA cotton strategy <p>COS CONCLUSION: STRONG BUT WITH QUESTIONS REMAINING</p>
2.WST.D01	WST	WB-SDN	Prevention of Seed Cotton Contamination	<ul style="list-style-type: none"> ▪ Will be implemented in coordination with the CFC and CCI. ▪ Specific WB Expertise not clearly defined. ▪ Complementarity with the CFC/ICAC/38 fiche (see 2nd fiche below), is unclear. <p>COS CONCLUSION: STRONG, subject to clarification on coordination and synergy with CFC and CCI and specific information on WB contribution</p>
2.WST.D02	WST	WB-SDN	Economic and environmental impacts of the introduction of biotechnologies in West Africa	<ul style="list-style-type: none"> ▪ Added value in relation to IFPR study? ▪ Link with the Action Plan not emphasised. ▪ Planned coordination with AFD and WACIP? ▪ AFD/CIRAD Project from B Faso has the same objectives???? ▪ <p>COS CONCLUSION: NOT RECOMMENDED</p>
2.WST.F02	WST	CFC	Prevention of Seed Cotton Contamination in West Africa	<ul style="list-style-type: none"> ▪ Not yet approved by CFC Board ▪ Planned joint implementation with WB and CCI. ▪ Need to bring project duration (or that of some components) in line with duration of the 3ACP Programme. ▪ Complementarity with the WB/Cotton02 fiche (see 2nd fiche below), unclear. <p>COS CONCLUSION: STRONG, subject to clarification on coordination and synergy with the WB and CCI</p>