

**COMMENTS AND INPUTS IN THE EUROPEAN UNION CONSULTATION
PROCESS ON THE DRAFT POLICY GUIDELINES FOR THE SUPPORT OF
LAND DESIGN AND REFORM PROCESSES IN DEVELOPING COUNTRIES**

Submitted by the Zambia Land Alliance

Generally the document is quite comprehensive and contains a lot of useful information. However some of the observations include the following:

1. On Page 13, (a) Point 4.3, bullet two: *which says land registration and titling of existing rights*. Our observation is that this can also be vice versa i.e. land re-registration and re-titling of existing rights; (b) point 4.3, bullet five, *which talks about privatization of collective or state land*. Our observation is that it can also be conversion of private land to state land in cases of serious unequal land distribution (c) lastly, the objective or context of a land reform programme may also require addressing the interests and concerns of various interest groups such as the poor, women, disabled, youths etc.
2. On Page 18, line 5.6.2, last sentence. It may not necessarily mean that redistributing land from a few to many small to medium-sized holders would increase productivity if such a process is accompanied by proper support for the new land holders. This would largely depend on how this whole process of redistribution is handled or implemented i.e. Zimbabwe issue.
3. On page 18, section 5.7.3 need to include the importance of harmonizing various sectoral policies that touch on land to avoid fragmentation and contradictions in policies.
4. Page 19, dissemination of information should not only be on the scope and content of the reform, but also on the existing policy and legal provisions. In Zambian land reform process, we have noticed that they are serious information gaps between the technocrats spearheading the reform process and the ordinary people in terms of what prevails as regards land delivery in the country. This makes it very difficult to move at the same pace. Therefore, information dissemination should also include detailed information on what systems and procedures are in place in the land administration of the country.
5. One of the key principles to a successful land reform is to ensure that adequate resources are mobilized to undertake the exercise countrywide to involve as many different actors as possible.
6. Page 20, section 25.7.11 on gender issues: deliberate policy provisions such as increasing access of women to land should also provide for support mechanisms to ensure their successful implementation i.e. providing necessary financial,

information, loans, credit facilities etc to women to enable them access, control and utilize land meaningfully. This section should also highlight how women are disadvantaged in terms of access, ownership and control over land.

7. On Page 21, section 6.2, should also highlight the important role of the civil society groups in the land reform process, which is information dissemination to the public as well as to engage them in the consultation process not just to be consulted (civil society groups should be part of the government land reform committees) to ensure transparency in the whole process. Civil society groups also play an important role of monitoring the land reform process to ensure that the right stakeholders are consulted and that their views are considered not just to monitor the implementation.
8. Page 22, section 6.2.3 civil society groups and the private sector also have an important role of implementing some aspects of the policy other to merely monitor and review the process of implementation by government.
9. Page 20, section 6, the role of different stakeholders should also include traditional leaders especially in the case of dual land tenure system: customary and statutory tenure. Traditional rulers for example in Zambia play a very pivotal role in the administration of customary land even in very remote parts of the country where the government does not reach.
10. Page 26, section 2.3 paragraph three, the structured process of land reform should also take into account the composition of the commission of enquiry. The commission of enquiry should be able to represent various interest groups as much as possible for the sake of ownership of the land reform process by various stakeholders.

General Comments

- a. The issue of special groups i.e. the disabled does not seem to come out very much
- b. There is also need to highlight more on the poverty reduction strategy papers (PRSP) and the debate surrounding them, in which other people feel that these strategy papers are not pro-poor driven but blue prints from donors.