**UNDP AFGHANISTAN FEEDBACK ON COMMENTS FROM MISSIONS ON THE NEW CPD 2015-2019**

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| COMMENT | FEEDBACK |
| **NORWAY** | |
| Describing and addressing more explicitly some of the main lessons from the experiences of UNDP in Afghanistan during the past 10-12 years. CPD could more explicitly how these lessons will be responded to. | Lessons learned by UNDP in the previous programming cycle 2009-2014 are incorporated throughout the document and serve as reference for UNDP to propose priorities for its work during the new cycle 2015-2019. Findings of the Assessment of Development Results and other programme evaluations are referred to in paras 3, 4, 18 and 22. Specific new references have been added on lessons learned in para 6 and 13. |
| How the working relationship with UNAMA will be strengthened. | The partnership with UNAMA is very important and referred to in several paras of the document. This is particularly important for UNDP’s work under outcomes 1 and 2. At the UNDAF level, UNDP co-chairs with UNAMA the Rule of Law outcome group. Para 10 mentions the preparation of outcome strategy for each of the CPD outcomes in light of the evolving UNAMA mandate after 2015. |
| Reference could also be made to World Bank analysis linking a substantial part of this growth to the international military presence, and the prospects that the growth may be impacted by the international withdrawal | UNDP acknowledges that the international military drawdown translates into more difficult economic times for Afghanistan and refers to this in section 1 of the CPD. |
| UNDP should in addition address the concern that the sustainability of a subnational governance set-up needs to be addressed | While recognizing the issue of financial sustainability of the sub national governance set-up especially given the very limited domestic revenue generation capacity, UNDP’s work to enhance sub-national governance is based on the Afghan sub-national governance framework and the relevant national policies. As mentioned in paras 11, 12 and 14, UNDP interventions will be guided by the resources made available to its programme and the priorities identified in consultation with Government and the donors. |
| Relation to the traditional structures of Shuras and Jirgas should also be included. | The importance of traditional governance mechanisms at community level such as shuras and jirgas as well as the plural legal traditions of Afghanistan are well acknowledged by UNDP (see para 6 and reference to shuras and jirgas in the Results and Resources Framework). UNDP is already and will continue to include these institutions in its governance, conflict prevention and peace building and rule of law work. Specific references to Shuras and Jirgas have been added in para 12. |
| When referring to the transition of the police from a paramilitary to a civilian police service, the very diverging views on the Afghan side and among major donors regarding this goal should be referred to, to indicate some of the challenges ahead. The meaning of the last sentence, about the need to redefine the LOTFA itself, should be clarified | UNDP acknowledges the diverging views on the issue of transition of the police from a paramilitary to a civilian police service, with the Government and among the international community. The rule of law and justice donor group mentioned in para 17 is expected to provide a platform to contribute to resolving these issues, in addition to other mechanisms. More details on this issue, including on the need to redefine LOTFA as a major financial disbursement mechanism, will be presented in the outcome strategy on rule of law mentioned in para 10. |
| UNDP indicates they will select critical ministries and certain key provinces to advocate for SCR 1325 and 2122. The criteria for the selection may be clarified. Under the same para it is important to be aware that gender-based violence is also a challenge in relation to men/boys, at least in parts of Afghanistan | Ministries will be selected on the basis of the relevance of their mandate with issues pertaining to SCR 1325 and 2122 and will include MoWA, MoJ, MoI and others. Provinces will be selected on the basis of the outcome of the political, social and conflict analysis mentioned in para 10. UNDP acknowledges that gender based violence includes issues related to men/boy relationships and adopts an inclusive approach when addressing gender-based violence and does not limit it to violence against women. |
| Under para nine, related to the outlook for Afghanistan, it would be useful if the approach to “rebalancing its programme and maintaining a flexible stance” and “a flexible regional presence, innovative and expanding partnerships and founding sources, and nimble risk management” could be more explicitly explained. | Clarifications on what is meant by rebalancing and flexible stance is found in para 11 where UNDP presents four guiding principles that address this issue. Furthermore, the flexible regional presence is explained in para 16 where a regionalization strategy is explained. On the funding sources, UNDP’s plans to diversify its funding partners is explained at the end of para 9 when referring for example to GEF and GFATM. UNDP’s approach to risk management is explained in greater details in paras 21 and 22. |
| they should also make Rule of Law a key question for their focus on the national level | Agreed. Para 13a refers to UNDP building its support on rule of law to national sector-wide reforms. |
| They want to strengthen approaches to regionalization. What do they mean by this? | The regionalization strategy implemented by UNDP is detailed in para 16. It will improve programme synergies and increase operational efficiency thanks to clustering and common premises and services. It will also strengthen coordination with other United Nations organizations at the sub national level |
| A fifth guiding principles should be proposed; to have a balanced approach in relation to region, ethnicity and religion. This is to avoid acting in a non-conflict-sensitive way | Conflict-sensitive programming is very important and a key feature of UNDP Programming in Conflict countries. Para 10 clearly underlines that “Conflict sensitivity will be applied throughout the programme and will be mainstreamed in all projects”. The importance of balanced approaches is also acknowledged in same para 10 with the intention of undertaking political, economic and conflict analysis of provinces where UNDP is working. |
| they introduce “pilot regions and provinces”. What is this? If they are going to introduce pilots after more than twelve year in the country, they should make an argument for it. | Given limited resources, UNDP is not in a position to implement all programmatic activities across the country’s 34 provinces but will focus on policy level engagement and demonstrate the value of its proposed programmes in selected provinces. UNDP will ensure the interventions can be up-scaled based on availability of additional resources. The word “pilot” has been replaced by “selected” to avoid confusion. |
| There are multiple programs and projects doing important work in the rule of law sector who will continue doing this in the future – EUPOL, IPCB, CSTC-A to mention a few. None of these are mentioned. The document should to a larger extent address how UNDPs efforts are coordinated with these actors in order to strengthen MoI, MoD and MoJ. | Most of these institutions and programmes are members of the rule of law and justice donor group mentioned in para 17. UNDP is a member of this group and ensures complementarity of its work in this sector through donor coordination and bilateral consultations. A specific reference to the members of the RoL and justice donor group has been added to para 13a. |
| In para thirteen, Outcome 2, under (a) Justice and police governance, several relevant actions are presented. How realistic are they? They refer to the need for the government to take responsibility for the police payroll. This should have happened in 2011 according to the program document for LOTFA Phase VI. It has still not happened. Why? They write that the AIHRC should play an important role in oversight of the justice and the police. What are the conditions for AIHRC to take up that role in an efficient way? | The many diverging views between and within Government and donor community engaged in the police reform process did not make it possible to ensure the transfer to the government of the police payroll till now. UNDP is committed to this and works with its partners to build sufficient capacity within MoI and build a transparent and auditable system to satisfy donor confidence to make this transfer possible during the new programing cycle. The mandate of AIHRC makes it a relevant partner to enhance oversight by an Afghan institution of the justice and police. Strengthening the capacity of this institution is therefore important and included in the UNDP programme, including in LOTFA phase 7 currently under formulation. |
| However, there are additional weak links, like the police attitude, the functioning of the courts, the penitentiary system and defense lawyers are all major weaknesses | Agreed. Weaknesses across the rule of law sector require a holistic approach to address the challenges in this important sector. UNDP support to national sector-wide reforms and linkages between all relevant government institutions as well as between formal and informal justice service providers are highlighted in para 13 a. Strengthening coordination throughout the justice chain is mentioned in para 13 b. |
| it is rather unfounded how their initiatives should discourage poppy cultivation | Eradication of poppy cultivation is a very complex and ambitious goal in Afghanistan. UNDP intervention to promote sustainable livelihood opportunites as explained in para 14 a is “expected to discourage poppy cultivation” by offering alternative legal sources of income and will complement the more ambitious activities of UNODC in the framework of the implementation of the outcome of the UNDAF on equitable economic development. |
| Under para eighteen, they underline the importance in increasing their ties with civil society, both as a means of delivering its programmes and to enhance accountability. It is important here also to underline, what they have stated earlier in the program, the importance to avoid building up parallel structures to the government | Agreed. Lessons learned from previous interventions of UNDP and more generally of the international community have shown the limitations and perverse effect of setting up parallel structures to Government. UNDP is committed to avoid this as stated in para 10. Working with civil society is not intended to replace these but to strengthen the involvement of citizens in development processes and enhace accountability. |
| Under the headline Programme and risk management, para twenty-one, they also list internal risks. Given the recent mismanagement of funds in LOTFA, the danger of corruption and mismanagement should be included | Agreed. Several initiatives have been undertaken by the Country Office to mitigate risks of corruption and mismanagement such as tighter internal controls, trainings on ethics. Para 21 refers to internal risks and mentions “inadequacy of oversight and accountability measures and financial management systems”. Mismanagement of funds has been added to the list of examples of impact if internal risks were not properly mitigated. |
| promoting information sharing on risks with other donors and the Afghan authorities and other partners | This aspect is indeed very important in a country such as Afghanistan. The recently established Risk Management Unit in the Office of the Resident Coordinator and the Oversight and Compliance Unit of the UNDP Country Office are partnering with other donors and Afghan partners to address this. Partnership fora mentioned in para 17 are also intended to provide platforms for information sharing on risks |
| UNDP has a responsibility to establish a trustworthy system in the organization. Given the overarching goal to strengthen capacity on the Afghan side, it is also important to relate actively to the national systems for control and oversight | Agreed. Para 27 underlines the intention of UNDP to “develop national institutional capacity to collect, update, analyse and utilize statistical and monitoring data to strengthen evidenced-based development policies and strategies through national systems.” |
| **SWEDEN** | |
| Communicate on priorities with the the government of Afghanistan as a “fragile state” (the Afghan government does not regard itself as a fragile state) | The CPD refers to the operating context as being fragile but does not qualify the country as being a fragile state. The New Deal for Engagement in Fragile States is referred to but it has been fully endorsed by the Government |
| How has the programme been coordinated with the current government, and how to communicate with the new government (timeframe) | The new CPD has been extensively consulted with Government through several workshops and the comments from various Ministries incorporated in the document. It is envisaged that a comprehensive discussion will be undertaken with the new Government coming out of the April-June 2014 elections to re-validate the content of the new CPD 2015-2019. |
| How to work with the decentralization (feasible mechanisms) of the financial resources? | UNDP has been involved in the formulation of the provincial budgeting initiative implemented since 2013 by the Ministry of Finance and is committed to continue this support. Collaboration between concerned ministries will be important. A specific reference to fiscal decentralization and accountability mechanisms has been added to the CPD text in para 12a. More details will be provided in the outcome 1 strategy mentioned in para 10. |
| Gender aspects seem at a low level in the subnational level programmes | Gender work is mainstreamed throughout the UNDP Programme at both national and sub-national level. UNDP’s strategy on Gender mainstreaming is available to provide more details on this work. Several on-going programmes of UNDP such as the Gender Equality Programme and the Justice and Human Rights Programme for Afghanistan address gender concerns at local levels in selected provinces. This will be continued and further expanded including in the new sub national governance and development programme where a specific project on local economic development will include issues of economic empowerment of women and safe markets in several provinces of the country. |
| Total budget for gender issues is 15% which seems rather low | UNDP’s commitment to allocate 15% of its resources to gender equality and women’s empowerment is a minimum and should not be interpreted as a limiting factor to UNDP’s commitment to working in these important areas. |
| Coordination with other donor programs in similar areas (ie ARTF’s NSP) | Donor coordination to avoid duplication and maximize impact of partners’ interventions is very important for UNDP throughout its programme. Several mechanism are highlighted in para 17 in this regard. Specifically on ARTF’s NSP, UNDP already works closely with this programme through its programmes with MRRD on rural development |
| **FRANCE** | |
| What elections exactly are targeted here (legislative, municipal, district coordination councils?) and what is the exact content of IPU benchmarks? | Para 12 underlines that “UNPD electoral cycle support will assist national institutions in the better management of presidential, parliamentary and local election processes”. Information on IPU benchmarks for democratically elected legislatures are available at <http://www.ipu.org/pdf/publications/self-e.pdf> and <http://www.undp.org/content/dam/aplaws/publication/en/publications/democratic-governance/dg-publications-for-website/benchmarking-and-self-assessment-for-democratic-legislatures/benchmarks%20Legislatures.pdf> |
| What are the means and tools that are considered to be implemented to increase the resolution of local conflicts and grievances? an increase of the number of mediators?  Will this initiative not interfere with the provincial Justice institutions? | Para 12 b provides details on how UNDP will strengthen institutional capacity for peace-building at both national and provincial and district levels. It includes promotion of community-centered solutions, mediation efforts of local institutions and addressing issues of access and management of natural resources such as land and water. The work of provincial justice institutions complements these mediation and conflict prevention interventions but is very distinct. More details will be provided in the outcome strategy mentioned in para 10. |
| Output 3: This seems very vague particularly taking into consideration that provincial budgeting was initiated in 2014 and that data will only be available in 2015 | Output 3 is not limited to the support to the implementation of the provincial budgeting initiative started by the Ministry of Finance in 2013. It addresses the broader issue of Government capacity to deliver better services through assessment, planning and budgeting but also improved transparency and accountability. More details will be provided in the outcome strategy mentioned in para 10. |
| The whole of this part is imprecise and made of generalities that do not infer a fine knowledge of the sector. As an example, the following : “This will involve strengthening coordination throughout the justice chain, including the Ministry of Interior and the Ministry of Justice” would need clarifications and references to what has been done and/or achieved previously in a sector that has been financed and addressed before | Outcome 2 on Rule of Law is targeting interventions that adopt a strong human-rights based approach to development, meaning addressing both the obligations of duty-bearers in providing rule of law services and the right of claim-holders by ensuring them a better access to rule of law services. In addition, to ensure no duplication between the various partners active in this important sector, a specific donor coordination mechanism exist and UNDP’s participation in it is highlighted in para 17. The Results and Resources Framework provides more details at the level of the outputs and indicators. Furthermore, more details on UNDP work in the area of Rule of Law will be presented in the outcome strategy mentioned in para 10. |
| “population with sustainable access to an improved water source has increased, with UNDP support, from 23 per cent in 2003 to 31 per cent in 2013”, we do not see that issue addressed in the document, whereas it should still be considered a priority | Access to improved water source is part of the provision of basic social services to the Afghan population and is addressed by the UN through a specific UNDAF outcome. UNDP contributes to this important objective in specific projects of rural infrastructure improvements identified by the communities but is not a major player compared to UNICEF, WHO who are the lead agencies in this sector. Given this, the sentence has been deleted from the document. |
| We welcome the inscription of social equity in the program but question the presence of item (c) Strengthen enforcement of legislation on violence against women which should be part of outcome 2 justice and rule of law | UNDP believes that gender issues including violence against women are to be mainstreamed throughout the new Country Programme and are more than a Rule of Law issue as it has strong social and cultural dimensions. By dedicating a specific output to this important issue under outcome 4, UNDP believe it will be more efficient in addressing this challenge. Nevertheless, strong linkages and synergies will be ensured with UNDP work under outcome 2. |
| On the policy of promotion of women, the CPD should precise the distribution of competences between UNAMA, UN-Women and UNDP, in order to avoid overlap and duplication of efforts to reach the same goals | Coordination with other development actors (UN and non-UN) is very important and will be addressed through various mechanisms such as those mentioned in para 17. In the context of the UNDAF implementation, UN specific coordination mechanism as well as the integrated work plans in the context of UNDAF implementation are also established to avoid duplication of efforts. |
| In a non-industrialized and little polluted country such as Afghanistan, the output 8 should focus on resilience to natural disasters and avoid a broad “resilience to climate change”. Thus, the Indicator 8.2. “Number of provincial development plans in which climate change adaptation measures are explicitly addressed and budgeted” seems not to be relevant and should be removed | Afghanistan is one of the most vulnerable countries to the negative impact of climate change which translate in increased trends of natural disasters. Addressing disaster risk management without incorporating the impact of climate change would limit the sustainability of UNDP intervention in this area. The focus of UNDP work in this sector will be on adaptation to climate change such as in the agricultural sector and development planning, much less on mitigation. In a country as vulnerable as Afghanistan, many aspects of development planning require the inclusion of climate change effects such as on infrastructure, land use, agriculture, etc. |
| The effort currently engaged by UNDP to make the use of funds within the LOTFA more transparent should be specified | Project-specific information is difficult to include in the CPD given the imposed limited length of the document. More details will be provided in the outcome strategies mentioned in para 10. |
| A better targeting of beneficiaries would be welcomed | One of the four cross cutting principles highlighted in para 11 is “area based approaches for better targeting of beneficiaries”. Socio-economic analysis will be carried out to ensure that direct benefits accrue to specific populations groups that are targeted by UNDP interventions. Throughout section 2, specific beneficiaries are also identified such as women, marginalized people, unemployed youth, people with disabilities and those living with HIV, depending on the outcome. |
| The investment in the regional south-south cooperation, and in particular in the Istanbul process on Regional Security and Cooperation for a Secure and Stable Afghanistan, also merits a greater attention and support | Agreed. South-South and Regional Cooperation and frameworks are very important for AFG and UNDP aims to support the country in these areas. The Istanbul process is mentioned three times in the new CPD (Paras 14 and 18) as a framework for work in different sectors such as economic cooperation, collaboration in the area of disaster risk management. Similarly, South-South cooperation is mentioned 5 times(Paras 7, 11, 12, 14, 17) |
| The section on the inter-agency coordination should be strengthened to have a better idea of this dimension in the implementation of this programme | Coordination with other development actors (UN and non-UN) is very important and will be addressed through various mechanisms such as those mentioned in para 17. In the context of the UNDAF implementation, UN specific coordination mechanisms, such as the integrated work plans for each outcome, are also established to avoid duplication of efforts. Furthermore, partnerships with other UN Agencies, Funds and Programmes are highlighted throughout section 2 of the CPD under the 4 outcomes. For example, UNAMA, UNICEF and UNFPA are mentioned in Para 13, UN Women in para 14. More details on this important aspect of UNDP work will be provided in the Outcome strategies mentioned in Para 10. |
| **JAPAN** | |
| Request to prioritize on the outcomes and projects, which have more feasibility among the proposed. Review the priorities of the projects according to the feasibility and expected result on the baseline, since some of them in Annex (Results and resources framework) are not available at this moment. | UNDP’s programming within the frames of the Country Programme Document will be evaluated continuously throughout the lifespan of the programme and revised according to feasibility of implementation as well as donor and government interest and backing of the proposed activities. Keeping a high level of flexibility in the programming in coming years, especially due to the uncertainty of the situation in Afghanistan in the future, is indeed important and is foreseen in the CPD (paras 9, 16, 25). It is also envisaged that a comprehensive discussion will be undertaken with the new Government resulting from the April-June 2014 elections to re-validate the content of the CPD 2015-2019. |
| Many joint works, such as poverty reduction, gender, disaster management and regional cooperation, with the other organization and donors. Clarify the specific role of the UNDP in the each field, and its necessity of involvement as well. | Donor coordination to avoid duplication and maximize impact of partners’ interventions is very important for UNDP throughout its programme. Several mechanism are highlighted in para 17 in this regard. More details on UNDP’s work in these areas will be provided in the Outcome strategies mentioned in Para 10. In the context of the UNDAF implementation, UN specific coordination mechanisms, such as the integrated work plans for each outcome, are also established to avoid duplication of efforts. |
| We do agree with the difficulty on undertaking accurate needs-based planning and effective follow-up, monitoring and evaluation in the current situation. Among them, we would like to remind the importance of the monitoring and evaluation. The draft document indicated the possible use of the satellite surveillance, as the part of the UN system as a whole, however, we concern that it may cause increase of the cost in spite of the budget constraint. (Paragraph 27, Page 12). It is necessary to drop some outcomes and projects once monitoring and evaluation of those project become costly. | As mentioned above UNDP’s programming within the frames of the Country Programme Document will continuously throughout the lifespan of the programme be evaluated and revised according to feasibility of implementation as well as donor and government interest and backing of the proposed activities. Keeping a high level of flexibility in the programming in coming years is therefore indeed important and is foreseen in the CPD (paras 9, 16, 25). We do believe that there are areas for example under subnational governance where UNDP has an added value and important work can be done. This work can become challenging due to the volatile situation on the ground, including lack of access. This challenge is foreseen in the regionalization strategy referred to in para 16 where the flexible regional presence is explained. With regard to M&E mechanisms further research is needed and satellite technology is one of many options that will be discussed within UNDP and also at UNCT level. Funding for M&E will be covered in project budgets that will be agreed upon with donor partners and will as such not be a unilateral decision made by UNDP. |
| We also would like to clarify approximate breakdowns of the projects in each outcome in Annex (Indicative resources by outcome). | Project-specific information is difficult to include in the CPD given the imposed limited length of the document and the format of the CPD. More details will be provided in the outcome strategies mentioned in para 10 as well as the specific programme documents when developed. |