**UNDP South Sudan Responses to Donor Comments on CPD**

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| **Comment**  | **Remarks**  |
| **Australia** Overall comments 1. **Program focus: notwithstanding UNDP’s comparative advantage of supporting democratic governance globally, we recommend UNDP shift program focus away from institution building in South Sudan towards pillar 3 until the operating context stabilises and governance structures improve. This would also reduce the risk of directly benefitting combatants (through material support).**
2. **We commend the focus on supporting local level (community) engagement and social cohesion with a focus on resolving conflict without violence (paras 17 and 18). We suggest UNDP further define this objective to one that is measurable, achievable and targeted or SMART.**
3. **Welcome the focus on supporting small business and environmental degradation (para 39).**
4. **Welcome some analysis on lessons learned from UNDP’s prior programs to improve government capacity, given the significant challenges and limited impacts.**
5. **Risk assessment: Australia suggests UNDP further expand on its assessment of risks, including the impact of conflict on development program outcomes and priorities.**
6. **Specifically, we recommend the risks section further elaborate how the following will affect UNDP’s programme priorities:**
	1. **continued or increased deterioration in the economic situation (para 9)**
	2. **corruption at the federal, state and local level where UNDP is operating (para 10)**
	3. **potential risk of a deterioration in the relationship between the Transitional Government of South Sudan and UNDP (or the UN more broadly)**
	4. **impact of increased criminal activity on aid operations, including negotiating access and establishing reliable command structures**
	5. **security risks from and the drivers of communal violence beyond a lack of accountability (eg. political/tribal dynamics, the increased availability of weapons, increases in the bride price or changes to the economic situation).**
7. **Geographic focus: the CPD could clarify the criteria to determine where assistance will be delivered (para 25), particularly how beneficiaries will differ from beneficiaries of the humanitarian response. How will UNDP identify and target ‘hubs of stability’ and take into account conflict outbreaks and increased criminal activity (eg. Yambio, in south western South Sudan)?**
8. **The CPD could elaborate on the complexity of fluctuating states since the 2015 peace agreement and how UNDP plans to build capacity beyond Juba in the regional centres (notwithstanding the risks of focusing on institutional capacity building in the current climate).**
9. **Can UNDP further elaborate on the anticipated benefit to populations of deploying civil servants to regional countries (para 16)? How will UNDP target individuals and manage the risk of corruption?**
10. **Support UNDP focusing on areas of stability, though we welcome clarification where these areas are and whether they include opposition-controlled areas.**
 | 1. Noted. UNDP’s planned institutional support is substantially targeted towards community resilience and institutions that directly service vulnerable populations. Support to governance institutions in Pillar 1 is governed by the UN Human Rights Due Diligence Policy and Conflict Sensitivity analyses, which seek to minimise the risk of UNDP’s support fueling conflict.
2. Noted. Output 1.1 in RRF (page 10) defines the project focus, and include measurable indicators. However, the specifics will be elaborated in pillar strategic notes and relevant project documents
3. Noted.
4. Paragraph 16, and the cited evaluation report touches on lessons from capacity enhancing initiatives.
5. Noted. See paragraphs 43 to 46.
6. Included in para 46, 1st line
7. Added corruption as one reason for direct implementation. Para 46, line 9
8. Integrated in para 44
9. Integrated in para 45
10. Security risks related to outbreak of conflict (with no specific reference to conflict drivers due to word limit) is already reflected in paragraph 44
11. Hubs of stability have been identified by the Partnership for Recovery and Resilience as Aweil, Bor, Torit, Yambio and Wau. A footnote has been added. Last line under para 25.
12. Capacity building outside Juba will be catapulted from the hubs of stability.
13. Civil servants are deployed from IGAD countries to SSD, not the other way around. Buttress this point from evidence from the IGAD evaluation.
14. See item 7 above
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| Germany1. **II. 40 - How will these important activities relate to the work of UN AIDS and the activities conducted within the framework of the Health Pooled Fund?**
2. **II. 41 -Here too – how will these activities relate to the activities of the Health Pooled Fund?**
3. **III. 44 - It would be important to address the government’s role and how certain problems such as high staff turnover, limited capacities, and the political context will be addressed. What will happen to the programmes if the peace process fails? What if it is successful – would the focal areas need to be recalibrated?**
4. **IV. 48 - In view of several joint programming initiatives, it would be useful to know how UNDP will contribute to the joint programme.**
5. **Monitoring /evaluation/reporting. Will UNDP evaluate and monitor its own contributions separately/ how will optimal monitoring and evaluation be insured?**
 |  **i.**1. **HPF and GF both support service delivery. GF is focused on HIV and TB while HPF does other services at Primary Health Care level, but efforts are meant to be complimentary. UNAIDS does not support direct service provision. Their mandate focuses more on the critical needs of advocacy, provision of technical expertise and coordination. We have added a text on HPF and UN AIDS in para 40.**
2. **Collapse of the peace process is considered a programme risk, see para 54, and the suggested mitigation measures. Success of the peace process present programme opportunities, see para 31. Retention of DIM modality and substantial focus on services at the community level are inherently risk mitigating and conflict sensitive.**
3. **Generally, UNDP plays** integrator and convenor roles **in joint programmes, see para 23, line 2. Specific roles will be included in the respective joint programme documents. UNDP contributes to: a) programme implementation in our mandate areas; b) field-level coordination and technical support based on agreed division of labour; and, c) at the outcome group level, technical leadership and system-wide accountability for results.**
4. **UNDP’s own contributions are part of ongoing initiatives involving other funding partners. Thus, UNDP contributions are monitored and evaluated as part of existing project portfolios. 3% of programme resources are set aside for optimal monitoring, section IV. Additional, quarterly consultations with partners will strengthen continuous monitoring and accountability for results.**
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| UKWe welcome:1. The focus on three interlinked and mutually reinforcing pillars: (a) strengthened peace infrastructures and accountable governance; (b) inclusive, risk-informed economic development; and (c) strengthened institutional and community resilience; is fine and it is possible to fit appropriate activities under these pillars (although we question the feasibility of doing economic development or institutional strengthening here at this time).

However: 1. We feel the context analysis completely underplays the situation on the ground and the challenges we are all facing. This also means that (at least some of) the activities proposed are not at all appropriate.
2. A fair amount of the document reads as if this is a stable development context rather than a conflict which is likely to worsen over the three-year programme cycle.  For instance, the language tends to be around poverty elimination, whereas in fact poverty is worsening.
3. UNDP states they will be guided by the outcomes of the High-Level Revitalisation Forum, the National Development Strategy and the National Dialogue.  All of these processes come with their own set of issues, so we suggest UNDP need to be explicit about their caution in working in support of them.

We would therefore propose the following amendments as a minimum:1. Context needs to much more accurately reflect the reality on the ground – i.e. ongoing conflict, lack of genuine political settlement, access issues, lack of genuine implementation of ARCSS, impact on state systems which have largely disintegrated, challenge of working in government v opposition controlled areas etc.
2. Inclusion of language about how any support should be coordinated, slow, targeted, and conditions-based (e.g. based on a step by step approach which responds only to a positive trajectory which demonstrates political commitment etc.).
3. Inclusion of (much more) language over the need to be flexible and adaptive to reflect the context; to look at non-traditional UNDP approaches (i.e. doing development differently); and consultation and coordination with donors and other partners throughout this programme cycle.
4. Ensure that UNDP’s work is also in line with the wider UN family and direction from the UN Security Council. For instance, the last mandate renewal for UNMISS very specifically narrowed their support for peace and governance processes to a single line, i.e. support to the HLRF process.
5. In addition, we would like to see evidence that there is sufficient analysis going into any preparation for work in these areas. While we don’t think now is the right time to provide support to widespread governance and economic reforms, it is the right time to ensure there is adequate planning and preparation e.g. looking at lessons learned from previous support in South Sudan, political economy analysis, lessons learned from other conflict contexts etc.

UNDP have established a track record in some areas, including: * Rule of law working with the judiciary and other bodies. This programme has had to be re-oriented over the last couple of years (i.e. away from the police) and focused almost entirely on Sexual and Gender-Based Violence. This was a decent example of flexible programming responding to the changing context (and donor concerns).
* Regional twinning of civil servants at the state level.
* Some good technical support on transparency and accountability / economic issues, e.g. in strengthening the evidence base around the fuel subsidy, as well as providing support to try to improve transparency and accountability of the budget process.

However:1. Para 31 encompasses a huge range of governance and economic reforms. We agree with the inclusion of the paragraph to give UNDP the potential scope to support these should circumstances allow. But we believe the caveats outlined above are important to ensure this is done in the most conflict sensitive way.
2. The aims on economic development in particular reflect a much more stable development context than South Sudan (for instance Paras 37 and 33). Gender-responsive budgeting is important but not the priority in a context in which most of the tiny government spending goes on military strategies. Some paras are technically correct but overstate what UNDP is doing and what it is likely to achieve. For instance, para 37 describes work UNDP is indeed doing with Japan and the AfDB but the reality is that they are currently working in 3 – and trying to increase to 10 – of 32 States, but taxation is not the main constraint on business.

On consultation with partners:1. UNDP’s contribution from regular resources appears to be around US$10m over 3 years, i.e. about US$3m a year.  The table in the annex suggests around another US$253m from other contributions.   We would like to understand how the partners / donors listed have been consulted? For instance, do the HIV targets assume Health Pooled Fund funding?
2. Connected to the above (given the UK leads on the fund) the DFID Country Office has not been consulted on this programme and have not heard of others being consulted either.  Whilst we understand that the UNDP in-country team may present the document to donors in July, as well as conduct bilateral meetings with key donors, this will be too late given the deadline for providing the final document to the board.
3. We are concerned that the programme has not been developed coherently with all key bilateral and multilateral partners and believe that there is a need for a much more joined up approach to UN coordination with partners in country.

**Additional comments from consultations with DfID office in Juba**1. The CPD gives an impression that UNDP will implement all ARCSS milestones
2. Whilst the context highlights the main issues affecting the country, the priorities section gives an impression of a “normal” working environment, where the government is reflected as a willing development partner.
3. We recommend that UNDP uses phrases like; “try”, “attempt” as a more realistic reflection of what is feasible on the ground
4. Has UNDP’s role as leader for the joint programme been confirmed, and is there a UN joint programme apart from the area-specific programmes in Yambio and Aweil
 | 1. Noted. We note the concern on the feasibility of economic development or institutional strengthening at this time. Cognizant of this, the CPD adopts a flexible programming approach that emphasizes conflict sensitivity, community resilience and strengthening local-level institutions.
2. We have strengthened the relevant sections to further clarify and underscore the fact that South Sudan is not in a normal development context. The CPD acknowledges the grave situation, depicting a context of increasing vulnerability, fragility, violence and multilayered conflict in which the CPD will have to be implemented. Grim statistics on the dire state of the economy and society buttress this point. The compelling case is for a robust response to the challenges of breaking the cycle of increasing vulnerability and strengthening the coping capacities at the local level. This will not only impact poverty reduction, but will do so in a sustainable manner. [See Programme rationale] In addition, as part of an integrated response, UNDP intends to address the weak governance and accountability challenges that have tended to accentuate poverty and vulnerability in a vast majority of the states.
3. On the risk management side of operations, and in further recognition of the non-stable context, our Direct Implementation Modality fully recognizes the challenging and high risk operating environment, thereby emphasizing the approach to work directly with people and communities, principally through local and third-party implementation.
4. We fully agree that these processes are fraught with inherent risks and potential opportunities. The implementation and risk management modalities have fully taken these into consideration. The flexible and iterative approach means that programme response is contingent on the outcomes of these ongoing processes, which are by no means predictable. Either way, UNDP support will be required.
5. Noted. Ongoing conflict, non- implementation of the ARCSS and lack of political settlement already presented in para 1. Humanitarian access challenges included in para 6
6. Included text on coordinated and targeted programming in para 31. This is in addition to the targeting that was already elaborated in para 25. The programme emphasizes on joint programming to ensure a coordinated approach to addressing the development challenges. UNDP’s work is mainly at the community/local levels and based on programming criteria that ensure effective targeting, conflict sensitivity and accountability.
7. Noted and duly acknowledged. The flexible approach to programming is reflected throughout the document. Please refer to paragraph 23 line 7, and para 32. In addition, the programme management section now emphasizes quarterly dialogue with partners throughout the cycle.
8. The CPD is grounded in the UNCF, a UNCT-wide programming framework and recognises UNMISS mandate as an important building block. See paragraph 20. Paragraph 28 is explicit on UNDP’s planned collaboration with UN agencies and UNMISS in support of ongoing peace processes. We included text on UNSC in para 31.
9. Noted. Included political economy analyses, development of position papers in para 28 line 5. Lesson learning from similar context already included in para 28. Furthermore, profile analysis and stock taking exercises will shape programme design, implementation and partnerships.
10. Noted. As highlighted above, the document acknowledges the volatile context, and commitment to a flexible, conflict sensitive programming approach.
11. Noted. Paragraphs 33 and 37 have been revised accordingly. We believe that advocacy for gender-responsive budgeting is essential to pursue in the states that we are active in. Also note that while our work with Japan and AfDB on PFM is mainly in 6 states, key government stakeholders from all the 32 states received training and knowledge products on non-oil revenue generation and management. Building on the progress and lessons learned from the initial three pilot states, we expect the project reach to meet/surpass the set target. Taxes are, in this instance, pursued as a viable source of non-oil revenue and a vehicle for transparency and accountability, hence the drive for tax law harmonisation across states.
12. Resource envelope is based on historical trends and ongoing consultations at both project, programme and UN-wide levels. This is in addition to ongoing thematic discussions and emerging interest and opportunities in resilience building, peacebuilding, youth empowerment and social cohesion, amongst others. The revised document reflects the outcome of additional consultations and discussions on the programme priorities. Specifically, the projections reflect US$28 million from Global Fund, US$9 million from GCF, US$4.5 million from GEF and US$6 million from PBF based on the existing consultations. For the SS Humanitarian Fund (SSHF), a conservative projection of US$80 million over the next three years is included, slightly down from the annual average of US$41 million over the last couple of years.
13. UNDP currently does not access funding from the Health Pooled Fund, but acts as Managing Agent for the SSHF, and Principal Recipient for the Global Fund.
14. Outcome of consultations, as well as feedback from key partners, are incorporated in the revised document. Given the fluidity of the operating context, additional consultations will be undertaken and further feedback incorporated before the EB, and inputs from funding partners will be incorporated during the development of specific interventions.
15. Paragraphs 25 and 31 has been modified to reflect UNDP’s involvement in governance issues
16. Paragraphs 33 & 37 has been strengthened to reflect that the focus of UNDP’s support.
17. Paragraphs 26 & 27 have been adjusted accordingly.
18. Paragraph 35 has been strengthened to reflect location of the joint programme, reemphasize UNDP’s role, and the partnership that will enable success to the joint programme
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