**COMMENTS ON THE UNDP DRAFT COUNTRY PROGRAMME DOCUMENT FOR BANGLADESH (2022-2026)**

*Second regular session 2021*

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| **Comments by Sweden** | **Country Office Responses** |
| In general, the plan is clearly linked to the draft UNSCDF 2022 – 2026 and focus on the 3 strategic priorities in this overall plan that are within UNDPs mandate. | The comment is well noted. |
| It is noted (Point 23) that “UNDP will apply a cross-portfolio approach to programming and ensure a dynamic linkage and interaction between the three outcomes both programmatically and operationally…” To apply such approach and implement programs more jointly with other UN agencies and also cross-portfolio within UNDP need to be emphasized and strengthened in the actual implementation. | The comment is well noted. There are several mechanisms in place to ensure cross-portfolio collaboration and coordination during the whole cycle of programme/project management including implementation. These include (i) the internal UNDP programme team and (ii) the UN Programme Management Team (PMT) of which UNDP is the co-chair. Additionally, some projects will respond to multiple outcomes concurrently. |
| The absence of focus on nexus programming, and UNDP’s role therein, is a gap. An elaboration on UNDP in the coordination of development efforts in Cox’s Bazar would be welcome. | The comment is well noted and is addressed in the revised para 24. |
| In spite of that the strategy has UNSDCF SP 4; Transformative, participatory and inclusive governance, as one of its priorities, the strategy does not have clear action in the draft programme to fight against corruption that aims to reduce poverty. | The anti-corruption agenda will be pursued in the new programme cycle and this is covered by the implementation of the national integrity strategy referred to in para 20. |
| Related to Point 34 (under Monitoring and Evaluation) Also a third-party **Audit** of Project /Program could be included to ensure transparency and accountability. Such a more innovative approach could significantly boost UNDPs effort on Zero Tolerance. | UNDP has an established audit policy globally. All internal audits are carried out by the independent Office of Audit and Investigation (OAI) that reports directly to the UNDP Executive Board. All audit reports are publicly available, and the UNDP Resident Representative is held accountable for the implementation of audit recommendations. |
| * The strategy includes actions around supporting function and policies for a better market system but lacks actions to create conducive market (local, regional, national and international) where the target group (women and vulnerable) can secure an access. | The planned UNDP interventions are not designed to create markets, which goes beyond the scope of our cooperation. Rather we aim to ensure small and medium enterprises have the capacity to get access to (existing) markets. This emphasis is incorporated in the revised para 14 (c) in particular. |
| **Comments by the UK** | **Country Office Responses** |
| It is unclear why the 2020 baseline for Indicative Indicator 2.1.1. (Number of people adopted diversified, climate-resilient livelihood options), is zero, whereas most other indicators have a 2020 baseline well above zero. | The comment is well noted. The baseline of the indicator will be determined in advance of starting any new activities. Accordingly, revision is made to indicator 2.1.1 of the RRF by changing the baseline from ‘zero’ to ‘TBD’ |
| UNDPs role in advocating for the implementation of the peace accord in Chittagong Hill Tracts has been crucial in the past. The 4 year programme documents fails to lay out a clear strategy or a target (at outcome or output level) to work with the government to improve indicators in the region. | The comment is well noted. UNDP will continue assisting the government in the implementation of the Peace Accord in Chittagong Hill Tracts through the localization of the Sustainable Development Goals in lagging districts including CHT.  It should also be noted that all of UNDP work in CHT is around peace preservation. This will continue and evolve with time.  MoCHTA is included as a partner for all 3 outcomes and this has been reflected in the RRF. |
| **Comments by Denmark** | **Country Office Responses** |
| **Outcome 1/ Outcome 3:**  While UNDP acknowledges that implementation of the Peace Accord remains incomplete, and plans to continue support for democratization and strengthening of decentralized governance institutions, UNDP does not indicate any concrete efforts in working with the Government of Bangladesh (GOB) towards increased implementation of elements of the Peace Accord. Since UNDP is the UN body best positioned with the GOB on this front, it may be worth taking on a stronger leadership role in order to promote meaningful impact in the implementation of the Accord. | The comment is well noted. With UNDP’s comparative advantage being its long standing and widespread field presence together with community confidence, UNDP will continue assisting the government in the implementation of the Peace Accord in Chittagong Hill Tracts through the localization of the Sustainable Development Goals in lagging districts as mentioned in para 9(a).  MoCHTA is included as a partner for all 3 outcomes and this has been reflected in the RRF. |
| There is also a need for UNDP to play a strong role in the HUM-DEV nexus in Cox’s Bazaar. It is not clear why the Ministry of Chittagong Hill Tracts Affairs (MOCHTA) is not mentioned anywhere in the stakeholder analysis as one of the major partners, when UNDP is planning to work with MOCHTA until 2026 through the Strengthening Inclusive Development in Chittagong Hill Tracts (SID-CHT) project, the extension for which they are working on now. In fact, MOCHTA is not mentioned anywhere in the document. | The comment is well noted. Due to limited words allowed for the CPD, we are not able to elaborate as much as we would have wished. However, risk informed, and climate resilient development is one of the priorities of the country programme. The issue of HUM-DEV nexus will be addressed not only in Cox’s Bazar but in all lagging districts as mentioned in the revised para 24.  The omission of MOCHTA in the document is an oversight. It is now included in the RRF. |
| **Outcome 2 (Linked with strategic planning outcome 3):**  Output 2.1 is clearly linked to the requirement of individuals, institutions, and actors with regard to climate change adaptation. However, there are no references in relation to investing in loss and damage considering the country’s vulnerability and priority with respect to climate change. Currently the GOB’s Standing Order on Disaster (SOD) has a strong focus on this and the upcoming COP 26 is expected to have outcomes on the loss and damage agenda (e.g. Forecast based Action/FbA, reinsurance/risk insurance and more). Given that UNDP is strategically placed as a strong advocate both at the grassroots level and with the GOB on climate change and environment, it could focus further on capacity building in this area. UNDP could undertake consultations with a view to identifying context specific solutions for the upcoming policy formulation and implementation. | Our work on climate (para 17) covers all tracks of the Paris Agreement (adaptation, mitigation, loss and damage) and has a wide range of interventions including capacity building, policy formulation and support to implementation. UNDP will further intensify our support to the Government, communities, private sector, and CSOs to strengthen capacities for climate and disaster risk management and fit for purpose policy formulation. This will include locally suitable means such as forecast based action and insurance. |
| **Outcome 3**  This outcome is very much aligned with the policy regimes especially the 8 Five Year Plan (8 FYP) of Bangladesh, which also strongly emphasizes the importance of inclusion, equality and non-discrimination, participation and proactive public integration of all including the religious minorities, disadvantaged groups and women; elimination of gender discrimination and violence against women, installation and strengthening of transparency of the functional processes of the Local Government Institutes (LGIs). Furthermore, the 8FYP also highlights the importance of allocating additional resources for the LGIs for promoting gender equality with specific and targeted results. The programme interventions appear to be complementary to the 8FYP which also aims to install inclusive and gender-sensitive citizen accountability mechanisms through social partnership, inclusion, and promoting gender equality in all formal institutions including the local governments. Furthermore, Outcome 3 is consistent with the long-term goal of Perspective Plan 2041, to further strengthen the democratic governance process to ensure participation of all citizens as well as installing functionally effective democratic institutions at all levels. The proposed outcome could also be complementary to reaching out to the poor and vulnerable groups with a transparent and effective social security benefits payment system and likely to reduce the gender disparity in the financial inclusion process. | The assessment is well noted with appreciation. |
| The proposed program aims to further strengthen the Government, Parliament, judiciary, and oversight institutions towards improved accountability and transparency at multiple levels. This component is also very much one of the priority areas of the GoB. The 8 FYP plan recognizes the need for improving governance by strengthening democratic accountability and transparency. The project therefore would directly supplement and support the further strengthening of the oversight institutions towards enhancing the quality of performance and effectiveness. | The assessment is well noted with appreciation. |
| In terms of the synergy and vertical linkages, the “bottom-up” work of the NGOs at the local level should continue to be linked with the country-wide supply side activities in areas such as advocacy, support to legal framework and efficiency in the work of the National Human Rights Commission (NHRC), as well as core ministries promoting the rights and conditions for vulnerable groups. | The comment is well noted and this strategy of linking the ‘bottom-up’ at the local level with policy work at the national level will continue in the new Country Programme. |
| The Standing Committees at the Union Parishad, the lowest administrative tier, can be further activated to deal with issues like combatting violence against women and children, prevention of child marriage etc. | We agree with your comments about the role of the Union Parishad Standing Committee. We believe that the issue of combatting violence against women and children, prevention of child marriage etc. can be addressed at the decentralized level supported by national level policy and institutional reform. Our CPD adopted both top-down and bottom-up approaches (para 21 and para 10). Furthermore, we will work with the wider UNCT to address all these issues. |

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| **Comments by Germany** | **Country Office Responses** | |
| In line with our commissioning parties, Germany and our co-financing partners such as the European Union, through its technical cooperation (TC) in Bangladesh shares the view that one of the biggest development challenges that Bangladesh is currently facing is related to its vulnerability to external shocks, be it related to climate change or to changes in the demand from the world market regarding export oriented market sectors, such as the textile and leather industry. Furthermore, the understanding that inequalities in Bangladesh are growing, leveraged by a constant migration flow from rural to urban areas along with a rapid unplanned urbanization process is supported. This makes the population even more vulnerable, especially affecting women, youth and children. | The comment is well noted and the shared views on development challenges in Bangladesh are appreciated. | |
| We share the understanding, that the Covid-19 pandemic has had and has an enormous negative impact on the human development in Bangladesh, increasing the vulnerability of the population, challenging the development achievements of the recent years. We support the understanding that the pandemic has made evident the urge for a digital transformation in the economy, the governance structure and the citizenry in general to make processes and service delivery faster, more efficient and accessible. | The comment is well noted and we appreciate the convergence of views about the impact of COVID-19 and the urgent need for digital transformation and a more efficient service delivery. | |
| In line with the Country Strategy of Germany, German TC has established 3 areas of intervention in our development cooperation portfolio in Bangladesh. These areas match with the planned outcomes outlined by UNDP for the DCP 2022-2026. German TC focusses on (1) sustainable economic growth in the garment and leather industry, (2) adaptation of urban areas to climate change and sustainable energy, and (3) rule of law and empowerment of women. | We take note of the Country Strategy of Germany and the related areas of interventions in Bangladesh. We would welcome close collaboration with GIZ and KfW in the implementation of the new CPD | |
| In this regard UNDP and German TC basically work in the same sectors at the national level and often with the same partners, for example in the case of the Ministry of Environment, Forest and Climate Change; the Ministry of Labour and Employment and the Planning Commission, which creates a high potential for synergies. German TC and UNDP are engaged in a constant dialogue for building alliances and cooperation to capitalize on this potential, as can be seen below. | The comment is well noted and we look forward to staying engaged in policy dialogues about areas of potential synergies. | |
| The UNDP Country Program has elaborated on three outcomes. There is no particular focus on ‘Energy, Energy Efficiency or Renewable Energy’. UNDP had engagements in this sector in last years – so there is apparently a shifting of focus now. Germany, through its Financial Cooperation (FC) is also active in Sustainable Urban Development and Climate Change Adaptation – these areas are very much aligned with the Outcome 3 of the above. Major partners for UNDP will be Local Government Division (LGD) and Ministry of Environment, Forest and Climate Change (MoEFCC). UNDP’s focus will be more on urban policy, institutional reform and poverty reduction and less on Urban Infrastructure Financing. From Germany’s point of view those are complimentary and we do not see any conflict of interest or contradiction to our FC activities. | While not elaborated in the CPD, our work on Sustainable Energy covers all energy related areas including Energy, Energy Efficiency and Renewable Energy. UNDP will continue to join up our efforts with Germany as well as other development partners, using the Local Consultative Group as a policy platform. | |
| We see a high potential for synergies between UNDP and Germany through its TC in Bangladesh for instance:   1. for establishing an efficient tagging and tracking system of Climate Finance between Economic Relations Division’s Aid Information Management System (AIMS) and Finance Division’s Integrated Budgeting and Accounting System (iBAS ++) 2. for establishing a web-based geographical information system centered application containing pertinent climate risk information to act as a decision support system for the GoB, especially Bangladesh Planning Commission and the Ministry of Environment Forests and Climate Change 3. for support to the Government of Bangladesh in achieving the national adaptation goals, e.g. through Capacity Development for the planning of climate adaptation measures. *(In line with Outcome 2b of the CPD: “Institutions have strengthened capacities to develop and deliver policies, strategies and legal instruments to improve and restore ecosystem health and manage risks, such as climate change, disaster, pandemics and humanitarian crises.”)* 4. for strengthening local government capacities in planning and public finance management with the aim of mitigating climate change induced risks; and the localization of the Sustainable Development Goals (SDGs) | We agree with Germany on areas of potential synergies and welcome opportunities to partner with Germany in those areas, toward the achievement of shared results. | |
| **Comments by the United States of America** | **Country Office Responses** |
| The United States and other Executive Board members - in formal and informal meetings of the Executive Board and with UN leadership, including the Development Cooperation Office (DCO) – as well as OP74 of A/Res/75/233 have set clear expectations that the UN development system do a better job to sequence entity-specific country program documents and their underlying Frameworks and/or outcome matrices. We note that only a draft outcome matrix was provided, without indication that it had been agreed by the Government and UNCT.  In the future, we encourage UNDP to ensure that finalized UNSDCFs and/or clearly marked ‘final’ or ‘approved’ outcome matrices are provided along with the draft Country Program Documents during the designated commenting period. | The comment is well noted. The outcome matrix (Results and Resources Matrix, RRF) was approved by the Steering Committee at their meeting on 24 May 2021. While the publishing of the UNSDCF and matrixes on the site is managed by UNDCO, we welcome any opportunity to further improve the process. UNDP has informed DCO of the need to add language clarifying that the UNSDCF and matrixes published on the UNDCO site during the designated commenting period should be marked final or agreed. |