**COMMENTS ON THE UNDP DRAFT COUNTRY PROGRAMME DOCUMENT FOR IRAQ (2020-2024)**

*First regular session 2020*

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| **Comments by Germany** | **Country Office response** |
| **Overall Strategy:** |  |
| * We welcome the draft country programme document for Iraq for its comprehensive description of stabilization and development needs in Iraq. It builds on UNDP’s extraordinary efforts to support Iraq in a highly critical phase, which we want to seize the opportunity to commend. | Thank you, Germany is a stellar partner of UNDP Iraq. |
| * We welcome that the previously underserved issue of environment and adaptation to climate change is now a core element of the draft CPD, given its existential relevance to the sustainable development of Iraq. |  |
| * We would appreciate a strong joint effort of UNDP with other development partners to regularize and strengthen nascent mechanisms for donor coordination by minimizing parallel structures and strengthening Iraqi ownership of the reconstruction and reform process (in line also with Findings 6 and 9 of the ICPE). This is particularly crucial as the country transitions from the post-crisis / stabilization phase (where quick results were imperative) to longer-term reconstruction and development (where close coordination and partner ownership are crucial). | UNDP Iraq will strengthen donor coordination in its mandated areas, notwithstanding the donor mechanisms to be employed by UNAMI and the RCO. In this regard, UNDP has already established a donor coordination group on social cohesion, co-led between UNDP and UNAMI, and with participation from IOM. On stabilization, UNDP will continue to co-chair the Stabilization Steering Committee and will present on the Stabilization Task Force. UNDP will also continue to serve as the lead for the Technical Secretariat on Security sector Reform for the donor group established on SSR and chaired by the SRSG. Notwithstanding this, the issue of Donor Coordination has been strengthened in the CPD text |
| * Coverage of nearly the entirety of the stabilization and development landscape in Iraq via UNDP as foreseen in the draft CPD is in our view overly ambitious and we urge UNDP to consult closely with other UN and development partners to achieve a better division of labour wherever possible. * In the current CPD draft, there is a lack of clarity regarding which instruments are to be used for which objective. There should be a clear distinction between stabilization as a response to the crisis brought on by the so-called “Islamic State” and longer-term development needs throughout the country. In the case of Germany, this has potential budgetary implications given the different mandates of the Federal Foreign Office and the Federal Ministry for Economic Cooperation and Development. * Paragraph 18 could be interpreted as a potentially significant expansion of the mandate of UNDP stabilization efforts to “disadvantaged areas… at risk for future conflict”. How is this defined? What are the geographic implications of this expanded understanding? How is short-term stabilization distinguished from longer-term conflict prevention? What are the programming implications of the proposed stronger synergies with other programme areas? * The previous CPD clearly defined the geographic areas of engagement for FFS. We would urge to again either define areas for stabilization geographically or at least instrumentally with greater precision. | UNDP has the mandate to work in all areas of the country, however, during 2016-2020, due to ISIL, the focus was on the liberated areas and the host communities. UNDP now is proposing to extend its work to areas that are prioritized based on a resilience-based needs assessment, which is showing a high degree of vulnerability for future conflict, namely, the 5 governorates of the South and the Baghdad belt, in addition to the ‘unfinished’ business in ISIL liberated areas. As outlined in the text of the Document, UNDP is also taking the opportunity under this CPD to strengthening partnerships with other UN Agencies On social cohesion, for example, UNDP already agreed with UNAMI and IOM on a joint coordination structure; on crisis prevention- with WFP and UNICEF; on rural development- with FAO and UN-Habitat. UNAMI will be a central partner across a number of issues.  Different instruments and financing channels will be used for stabilization in liberated areas and those in other regions of the country. UNDP will discuss with partners two modules of intervention: ‘Stabilization +’ for ISIL liberated areas; and ‘preventive Stabilization’ for conflict prone areas. UNDP will also try to extend stabilization activities to the most underserved regions of the country, in partnership with national counterparts, especially in Southern governorates and the Baghdad belt.  The areas for potential expansion will be identified based on a resilience-based needs assessment to identify areas of most vulnerability to shocks and stresses in the future. Expansion in ‘preventive stabilization’ will be discussed with external and national partners to elaborate the parameters of interventions. Short term stabilization will continue to target infrastructure, service delivery, municipal support, and emergency livelihoods, and social cohesion. Longer term conflict prevention will also address economic diversification, governance reforms, and climate change resilience, integrated for social cohesion and conflict prevention. Both will mainstream synergies for sustainability in the future programme period.  The areas for FFS will continue to be the ISIL liberated areas, but with additional emphasis on the ‘areas with the lowest return’ and the areas where there is higher resurgence of ISIL, in coordination with areas of coalition combat operations. |
| * Paragraph 24 reads “UNDP will partner with government institutions… including the Ministry of Interior and Security machinery”. It remains unclear which structures are meant by this. We would be grateful for clarification. | The national security machinery includes the Internal and Community Security forces |
| **Results Framework:** |  |
| * Outcome indicator 1.1 in our view blends two separate indicators into one and should be reviewed if possible. | This is taken verbatim from the UNSDCF and cannot be changed by UNDP |
| * Output Indicator 1.1.2 is not an effective measurement without further definition of what constitutes a minimum threshold for “infrastructure projects”. In its current wording it subsumes anything from a small playground to a major hospital. Under the previous CPD, the related indicator was further buttressed by sub-indicators. We would welcome similar specification. | We agree and will revisit these with a concrete indicator once state the resilience-based assessment is finished. |
| * Indicator 2.2.1 under UNSDCF Outcome 2.1 reads like a stabilization measure yet is included under the programmatic area “Growing the economy for all”. Placement should be reviewed/clarified. | It is both a stabilization measure and one for increasing access to economic assets and livelihoods. We can move to stabilization once the resilience-based assessment is done. |
| * Indicator 3.3.2. “Number of measures adopted to mitigate corruption risks, disaggregated by national, subnational and/or sector level” is insufficiently defined. What is considered a measure here? | Edited in text |
| * Indicators 1.1.1, 1.2.3, 2.2.2, 3.4.1, and 3.4.2. have gender-disaggregated baselines, but no disaggregated target despite mention in the indicator itself. This should in our view be specified to ensure sufficient effect for women. | The targets are gender disaggregated- Comment is noted and we will review this once the resilience assessment is done. |

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| **Comments by the UK** | **Country Office response** |
| * DFID colleagues in Iraq welcomed the opportunity to be consulted in the development of this CPD and DFID believes the overall approach broadly reflects the development needs in the country. | This is very much part of the Theory of Change at the heart of the CPD: which reflects the inter-linkages between the different programmatic axis and the Nexus. The assumption is that the improvement on all these aspects would strengthen state legitimacy and forge the way for a new social contract between the citizen and the state while in the meantime the Nexus will provide an important interim basis to move the country’s transition forward. |
| * DFID also welcomes integration with UNSDCF objectives.  We would like to see a stronger rationale linking strengthened stabilization, diversified pro-poor economic growth, improved governance with accountable institutions, and decreased fragility to climate change with the humanitarian-development-peace nexus and forging a new social contract. |
| * The document links service delivery/improvement with the generation of positive conflict related outcomes and greater state legitimacy.  It would be good to understand more about the specific conflict prevention-related outcomes this additional service delivery might bring.  As well as to see some further consideration of how these outcomes could be impacted by improving political processes between key conflict actors. | As now more clearly outlined in the CPD , UNDP works closely with UNAMI across a number of key areas such as anti-corruption, social cohesion and other areas which are intended to have further impact on improving political processes and the establishment of a more transparent and inclusive State structure. At the same time, UNDP will seek to support the appearance of the latter through its Stabilization programme by focusing on areas of hardest return and/or high risk. |
| * The CPD identifies the very fragile environment in Iraq and we would like to see more on the political aspect in relation to stabilisation, including at a local level, reflected in the programmatic elements - recognising the very ‘political’ nature of the proposed interventions themselves.  Reflecting this is the interpretation of corruption, which is quite technocratic and could perhaps benefit from a deeper recognition of the political nature of the system. | Development is political and more so in fragile conflicts such as Iraq with many different dynamics at central and local level that need to be taken into account. As per the previous answer, at the local level, UNDP aims to use stabilization/infrastructure initiatives along with specific community initiatives to secure peace dividends for increased social cohesion, decrease tensions and increase state legitimacy.  At the central level UNDP will pursue a series of initiatives around governance reform, rule of law and anti-corruption in partnership with national counterparts and also UNAMI given its political mandate. The latter partnership will be an important asset in addressing to the extent possible issues of challenges associated with entrenched interests, identifying blockages, entry points and designing appropriate strategies/initiatives. |
| * More specifically it would be good to see additional content on:   + What peacebuilding/political stabilisation programming could support wider efforts to strengthen the state   + What UNDP are doing to address short- and longer-term conflict flash-points/drivers   + How the programme will seek to build national ownership and capacity | All programming activities in the next CPD will be prioritized and implemented based on a conflict-analysis assessment, with the lens of strengthening state legitimacy and decreasing conflict triggers. In addition to the key programmatic aspects outlined above, UNDP is also finalizing a resilience-based needs assessment that has identified governorates that represent a number of conflict-triggers. These are in particular the ISIL liberated areas, Southern Governorates and the Baghdad Belt. UNDP will also conduct conflict development analysis for different regions to examine conflict triggers and mainstream these in programming.  Strengthening and expanding support for Governorates in the South and the Baghdad belt represents a major new front for UNDP in Iraq that addresses regions with known and significance grievances in term of developmental challenges, poor services and lack of inclusion. Strengthening Governorates in these regions will be a major contribution to strengthening a more effective and inclusive State.  UNDP will build national capacities through all its programming interventions, including training of government officials at the national and sub-national levels, strengthening national civil society organizations, and national private sector agencies. This includes in-the-job training and mentoring, as well as formal training and twinning. |
| * We would suggest that the document is more clearly prioritised as well as including more description of how UNDP will maximise synergies with the work of other agencies.  For example, it mentions that UNDP will seek technical collaboration with other agencies, but we would like to see this strengthened, perhaps with more on past collaborations, including on projects centred on conflict prevention and peacebuilding. | Implementation of the new CPD very much focuses on additional partnerships with UN agencies within the framework of the UNSDCF and based on comparative advantages. On social cohesion, for example, UNDP already agreed with UNAMI and IOM on a joint coordination structure; on crisis prevention- with WFP and UNICEF; on rural development- with FAO and UN-Habitat. UNAMI will be a central partner as outlined several times above. |
| * To assist with this, and as a more general point, we feel DFID country offices would welcome the opportunity to see a ‘package’ of UN CPDs at the same time to be able to pick up any overlaps and maximise synergies. |  |

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| **Comments by Finland** | **Country Office response** |
| * CPD Section IV: Monitoring and Evaluation, based on the costed evaluation plan, consider elaborating on:   + How will the planned evaluations serve accountability and learning? What will be produced? How will they be used for decision-making, documenting lessons learned and knowledge sharing?   + What share of the programme budget will be spent on M&E? | Evaluations are already a regular feature of managing initiatives and using lesson learned for development of new initiatives. Depending on the type of the programme/project M&E costs vary between 0.5-1% of programme budget. For example, a minimum of 1% is spent on monitoring implementation in stabilization programming especially to ensure a robust anti-corruption strategy is in place. All major UNDP programmes will undertake a forward-looking evaluation- the recommendations of which will be factored into any future programming.  The current CPD also outlines the establishment of a programme management and support unit (PMSU) to strengthen monitoring and evaluation capacity, programme quality assurance and management oversight. Each pillar will work in cooperation with PMSU to identify data limitations and prepare strategies to ensure availability of reliable data, evidence and analysis to improve results-based and adaptive management. |

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| **Comments by Sweden** | **Country Office response** |
| * Sweden welcomes that conflict-sensitivity will be mainstreamed in UNDP programs. * Further clarification is needed on how UNDP will mainstream gender-sensitive approaches to all programming: Which analytical tools will be used? Will there be any novel or innovative approaches to address gender equality and women’s empowerment in UNDP’s support of the Government and other actors; What resources are needed to ensure a gender sensitive engagement? | A point was added in the CPD narrative. UNDP has dedicated gender advisors in its stabilization programming, it now seeks to recruit more gender advisers on social cohesion. All project documents and proposals will ensure that gender considerations are mainstreams, and additional interventions dedicated to women in conflict and gender justice, as well as ISIL affiliated households (especially women) will be elaborated in the new CPD cycle. |