**COMMENTS ON THE UNDP DRAFT COUNTRY PROGRAMME DOCUMENT FOR SOUTH SUDAN (2023-2025)**

*Second regular session 2022*

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| **COMMENTS BY THE EU** | **UNDP RESPONSE** |
| * EUDELSSD welcomes the pillars on 1) Inclusive governance and sustainable peace and 2) Sustainable environment, economic empowerment and Resilience
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| * UNDP’s pillars are very much aligned with EU’s Multiannual Program (MIP) 2021-2027 for South Sudan and its priority areas on
1. Green and Resilient Economy
2. Human Development: Education and Health
3. Good governance, Peace and Rule of Law for a fairer society
 | EU’s MIP 2021-2027 for South Sudan has been presented and discussed with the CO by the EU Delegation to South Sudan and we note and appreciate the alignment of the priorities of the two Programmes. |
| * There is therefore a good opportunity for EU to cooperate with UNDP (and vice versa)

EUDELSSD is already in contact for possible collaboration with UNDP on an ‘enabling environment for elections in South Sudan’ (**still subject to formal approval by EU**) | In addition to possible collaboration on elections, we are also exploring opportunities in the areas of Green and Resilient Economy and Good Governance. |
| * Specific remarks on points raised in UNDP draft CPD for South Sudan:
* **Point 2**: EU is of opinion that mainly a) conflicts and b) corruption explain the dire humanitarian situation in South Sudan:
1. Conflicts are hampering actual development and are blocking the pathway from humanitarian assistance towards development.
2. Corruption is strongly hampering institutional response to basic needs of the population. The country is dominantly dependent on oil revenues. The latter do not go into the national budget, but are deviated for other purposes (very likely in the self-interest of mainly some government elites in Juba). In that context, the CPD should highlight that South Sudan ranks 180/180 in the Corruption Perception Index (CPI) 2021 (Transparency international).

If conflicts and corruption would be addressed, South Sudan could become the bread basket of the region, on food security (as confirmed in point 1 of CPD: “The country is endowed with vast landmass, 70 per cent of which is arable (with just 4 per cent cultivated)”Climate change shocks exacerbate the situation, but are not the real the root cause of instability and the dire humanitarian conditions. As long as conflicts and corruption persist (both are in the exclusive control of the government for addressing them), the country will continue depending on humanitarian assistance (which is decreasing because of worldwide competition of crises, cfr Ukrain), and will suffer from development donor fatigue. Despite already huge past and ongoing donors’ development support, there is no impact (which explains donor fatigue)* **Point 8:** EUDELSSD welcomes indeed the adoption of R-NDS, drafted with UNDP’s assistance. However, all will depend on genuine government ownership and the translation of it through the National Budget in particular on basic services, not only through sufficient allocations but mainly also through actual expenditures (past experience demonstrates that the National Budget does not walk (actual expenditures) the talk (‘promising’ allocations). There will need to be a strong focus on donors’ follow up on Public Financial Management (PFM).
* **Point 12:** In general EU welcomes the need for a partnership with government on development. Without such partnership there will never be actual development. Until now, such partnership is quite challenging at government elite at national level. Therefore, the proposed bottom-up state building approach at subnational local government angle may be an effective angle for progress.
* **Point 13:** the EU welcomes the focus on gender equality and UNDP’s goal for at least 15% of the budget going to gender related activities. This aligns with EU’s focus on gender with similar spending targets. In that context, point 1 in CPD could benefit from more extensive explanations regarding the vulnerable situation of women and girls in South Sudan: conflict related SGBV, stereotyping of women within a patriarchal society, unequal access to resources for women.
* **Point 14:** the EU welcomes the focus on private sector development via commercial banks. Indeed, South Sudan needs more internal resource mobilisation via commercial loans to the private sector, to the benefit for better diversification of the economy (away from oil dependence) and job creation. The EU is considering the possibility of working via guarantee schemes with commercial banks.
* **Point 15:** in the theory of change, apart from the reference to capacities of the government as a pre-condition for progress towards stability, there should also be an explicit reference to the need for political good-will of the government, in particular on conflict resolution (conflicts are often politically instrumented/instigated) and fight against corruption – see above - . Genuine goodwill is an important condition for the capacities of the government. Without the former there will not be the latter.
* **Point 17:** on elections: see above – the EUDELSSD is already in contact with UNDP for possible cooperation on an enabling environment on elections (**still subject to formal approval by EU**)
* **Point 19:** We note that the EU is mentioned as partner for drawing up on the Peacebuilding Fund (PBF). It should be noted that until now EU has had no contact yet on PBF with UNDP. However, EUDELSSD stands ready to discuss.
* **Point 21:** EU welcomes UNDP planned initiatives on DDR. DDR is indeed a necessity in South Sudan and will be important in the context of the unification of the armies. Such unification will imply that the country will have disproportionate defence troops, with resulting disproportionate budgetary allocations for security (at the detriment of provisions for basic services). There is a need for a plan to disarm, rehabilitate soldiers. In that context, eg a part of the troops could be reoriented to civilian security/policing.
* **Point 26:** The EU MIP also has an explicit focus on the displacement situation. In that context, first actions are already planned in the context of the ‘two Soudan durable solutions’ initiative’, mainly with UNHCR on refugees. It will be important for UNDP to liaise with UNCHR for complementarity, in particular for social cohesion and integration in host-communities. In addition, EU has also a first action under MIP on internal displacement situations with a focus on education, in cooperation with IOM/WFP/UNICEF. EU proposes for UNDP to coordinate with IOM and EU (lead entity of EU support) in this regard, for complementarity of support.
* **Point 28** on program and risk management: EU thinks that is somewhat risky to indicate “Considering the former [relapse into civil war] is less likely than the latter [subnational violence] … “. Given the historical background in South Sudan (civil wars in 2013 and 2016), the situation is volatile and unpredictable. Even though civil war may (hopefully) be less likely, EUDELSSD thinks it still would be prudent for UNDP to equally consider a mitigating plan for a scenario of relapse into civil war.
 | **Point 2 b:** The CPD references South Sudan’s ranking of 53 out of 54 African countries, on the Mo Ibrahim African Governance Index which encompasses a number of governance performance indicators, including corruption, underscoring the multi-faceted and mutually re-enforcing nature of the challenges undermining the country’s development. This gives a more wholistic assessment of the state of governance beyond corruption, climate change and conflict. **Point 13**: It is difficult to have an extensive explanation of the gender issues and vulnerability of South Sudanese women and girls with the 6,000 word limit for the CPD. Point 5 is dedicated to the challenges faced by women and girls and outlines the core issues which keep them vulnerable.**Point 15**: Commitment has been added to the Theory of Change as an additional pre-condition for achieving progress towards stability, political transition and development **Point 19:** The reference to the PBF is specific to the engagement with other UN agencies and not the other donors/development partners. **Point 26:**  The CO is in discussions with UNHCR on collaborating on the Durable Solutions Strategy and Human Mobility and will explore potential collaboration with the EUDELSSD and IOM on the EU funded initiative.**Point 28:** The CPD indicate the resurgence of civil war as less likely than intercommunal conflict does not discount it, so the preventive /mitigating measures outlined, will still apply. |

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