

Office of the Secretary of the UNICEF Executive Board

Template for delegations commenting on the draft country programme documents

2022 annual session

Draft country programme document commenting period:

22 March to 11 April (Kenya, United Republic of Tanzania)

24 March to 13 April (Syrian Arab Republic)

Delegations are kindly invited to use this template to share their comments on the draft country programme document being presented to the Executive Board during the forthcoming session.

Delegation name: **France**

Draft country programme document: **Syria**

In accordance with Executive Board decision [2014/1](#), draft country programme documents are considered and approved in one session, on a no-objection basis. All comments received by the Office of the Secretary of the Executive Board before the deadline stated above will be posted on the Executive Board website, and considered by the requesting country, in close consultation with UNICEF.

	Delegation's comments	Response(s)
General comments	<p><u>France has very serious concerns with regards to many aspects of this country programme.</u></p> <p>The CPD should better reflect the reality of the <u>ongoing conflict</u> as well as the <u>impact of 11 years of conflict</u>. Responsibilities of the Syrian regime in war crimes, crimes against humanity and corruption should be further highlighted. Crisis-sensitive programming should be taken into account especially in line with the “do no harm” principle. The ongoing political process and the framework of UNSCR2254, including mediation from the UNSG special envoy for Syria, should also be reflected in the text as a political solution for a sustainable peace. The need for the</p>	

establishment of rule of law and fight against impunity is not reflected in the analysis. **France would therefore like to see these elements taken into account, including an explicit reference to the UNSCR 2254, throughout the document and in particular in the contextual analysis.**

Compliance with the UN Parameters and Principles is an essential element in the implementation of this CPD. The reservation expressed by the Syrian authorities (see footnote 32 page 6) is a cause for concern. Strict compliance should be mentioned in the risk analysis, given the position expressed by the Syrian regime.

- According to the P&P, “Assistance must be prioritized based on the needs of the population (rather than on government driven”: assistance must be prioritized based on the needs of the population with a particular focus on the needs of vulnerable groups and individuals, in a manner that protects human rights as an outcome for all UN action in Syria.

We are therefore concerned that the assistance of the UN in Syria could be defined according to the Syrian regime’s needs and development strategy (Strategy “Syria 2030”) and to the extent to which the UN system would seek to benefit Damascus/line Ministries through national capacity building, given the high level of corruption that is not mentioned in the CPD, and with the risk this gives a sense of normalization, which is not acceptable. Early recovery and resilience programs should focus on communities and on the local level, with NGOs and CSOs as main partners.

	<ul style="list-style-type: none"> • <u>In line with the P&P, “Life-saving humanitarian needs remain enormous in Syria and assistance delivery through the most direct routes remains critical”</u>: assistance should more than ever remain focused on meeting the enormous humanitarian needs of the population. <p>Given the current circumstances, we believe it is too early to go further than resilience and early recovery. In addition, development activities would strengthen the Syrian regime’s institutions at the expense of the protection of Human Rights.</p>	
<p>Comments on specific aspects of the draft country programme document</p>	<p>Activities of UNICEF in Syria should stick to the implementation of the UNSC 2254 resolutions and focused on the intervention sector of early recovery (water, sanitation, health and shelter). In this regard, capacity building and technical support activities should be restricted to local actors only. Therefore, all other references to national capacity building should be deleted including in paragraphs 36, 39, 43, 44 and 51.</p>	
	<p>References to sanctions including “external factors” should be deleted (paragraph 3).</p>	

	<p><u>Contextual analysis should make a clear reference to the political, administrative and security obstacles for a voluntary, safe and dignified return of refugees.</u> Therefore paragraph 1 should mention the issue of refugees. Paragraph 2 should be rephrased to be more explicit. Alternatively, paragraphs 1 and 2 should be merged.</p>	
	<p>Considering the systematic practice of sexual and gender based violence by the Syrian regime, as well as the detention of children in the regime jails, <u>we would encourage UNICEF to make it a priority in the CPD.</u> Also, the CPD should refer to UN reports instead of national law, national priorities or data from the Syrian regime which do not reflect the reality of Syria.</p>	
	<p>National capacity building is not consistent with UNSCR 2254. If strong attention is to be paid to <u>data to monitor and measure the impact of UNICEF actions,</u> this should be done as proposed by UNDP in its CPD through close work with other UN departments and agencies.</p> <p>We have concerns on the ability of the <u>Syrian regime to produce accurate and reliable data.</u> As a result, we request the deletion of references to Syrian reports and data including in the following paragraphs: 5, 9, 16, 17.</p>	