

**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 2022***

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: Netherlands

Draft country programme document: Syrian Arab Republic

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.

	<b>Delegation's comments</b>	<b>Response(s)</b>
<b>General comments</b>		
<i>SF-level comments</i>		
	The Netherlands wishes to thank the UN agencies for their continued engagement and appreciates the adjustments that were made in the final stages based on grave concerns of The Netherlands and other donors. However, the Netherlands reiterates some serious concerns regarding the UN Strategic Framework for Syria (Framework). The Netherlands, joined by other member states, has previously expressed strong objections to the narrative of the Framework and concerns that it could undermine country level UN programs designed to help alleviate suffering of the Syrian people. The Netherlands is disappointed that the final Framework ignores	

	<p>the fact that conflict is the main cause of Syrians’ suffering today. The document does not use the word “conflict” to describe the situation in Syria since 2011.</p>	
	<p>The Netherlands reiterates its call for a political solution and emphasises that no normalisation, lifting of sanctions or reconstruction will be possible until the Syrian regime engages in a political transition, in the framework of UNSCR 2254 and the Geneva process. The Netherlands will not support UN programs that engage in reconstruction, and we will keep holding the UN to the commitments it has made within the “Parameters and Principles of UN Assistance in Syria.” Support to early recovery activities is strictly limited to early recovery activities as clearly defined under the HRP.</p>	
	<p>The Netherlands shares concern that the principle of ‘<i>non-refoulement</i>’ is not included in the Framework, where Pillar III ‘(...) <i>resilient return</i>’ mentions returns. Any discussion on returns should explicitly express the importance of ‘<i>non-refoulement</i>’. Conditions in Syria do not currently allow for safe and sustainable refugee returns. It is essential that the principle of non-refoulement is respected; that any refugee returns are voluntary, safe, informed, and dignified; and that the key concerns of the majority of Syrian refugees regarding a return home are addressed, including their personal safety and that of their families.</p>	
<p><i>CPD-level comments &amp; questions</i></p>		

	<p>The Netherlands remains concerned that a CPD based on a flawed Strategic Framework can have serious implications for UN activities and programmes in country. Can UNICEF provide explanation and clear measures how it intends to address this and mitigate any risks associated with implementing this CPD on the basis of the UN Strategic Framework for Syria?</p>	
	<p>For the Netherlands, at the core of any UN engagement in Syria is adherence to “Parameters and Principles of UN Assistance in Syria,” including the principles of neutrality, humanity, impartiality, and independence for life-saving humanitarian assistance and early recovery and resilience activities. This also counts explicitly for the work of UNICEF as it plans to implement the new CPD. However, Footnote 17 (<i>“The Government of the Syrian Arab Republic does not accept the document titled ‘Parameters and Principles of UN Assistance in Syria.’”</i>) effectively renders implementation with adherence to the Parameters and Principles impossible. Can UNICEF provide clear explanations and assurances on how it intends to address this and implement the CPD within the framework set by the Parameters and Principles?</p>	

	<p>Pressure from the regime to deviate from UN values and principles is a serious risk. Can UNICEF provide clear information and assurances that a risk mitigation system is in place to resist any pressure from the regime; to continue to work and implement the CPD fully aligned with UN values and principles; to report any instances of pressure to the Executive Board; and to address practices of government corruption, diversion of aid to favoured communities and profiting from exchange rate arbitrage?</p>	
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