

SYRIA 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 to share their comments on the draft country programme document being presented to the Executive Board during the forthcoming session.

Delegation name: United States of America

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	<ul style="list-style-type: none">• The United States reiterates its serious concerns regarding the UN Strategic Framework for Syria (Framework). While we acknowledge this is a document agreed to by the UN and host government, it underpins agency specific Country Program Documents (CPDs), which require Executive Board approval and implicate financial contributions to the work of UN agencies.• The United States, joined by other member states, has expressed strong objections to the narrative of the Framework and concerns that it could undermine country level UN programs designed to help alleviate	

	<p>suffering of the Syrian people. We are disappointed that the final Framework agreed by the UN and Assad regime retains language we find unacceptable.</p> <ul style="list-style-type: none">• The UN Strategic Framework ignores the fact that conflict – and specifically, the Assad regime’s brutal war against its own people – is the main cause of Syrians’ suffering today. The document does not even use the word “conflict” to describe the situation in Syria since 2011.• Nothing in the Framework alters the provisions of UN Security Council Resolution 2254, which was agreed unanimously by the Security Council, and remains the agreed upon international path for a political solution to the Syrian conflict.• The United States firmly supports the work of the Commission of Inquiry, IIIM, and other UN bodies, that are working to investigate crimes committed inside Syria by the Assad regime and other actors. The United States remains committed to promoting accountability for the regime’s atrocities, and we reiterate our willingness to impose U.S. sanctions on regime officials who commit atrocities. There can be no lasting political solution in Syria absent justice.• The Framework will not change U.S. policy regarding assistance in Syria – including our opposition to government-led reconstruction in Syria in the	
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	<p>absence of a political solution. The United States will not fund 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.”</p> <ul style="list-style-type: none">• The 2022-2024 UN Strategic Framework is not representative of the realities on the ground and is not reflective of the work being done by UN actors. Moreover, the document is full of dated statistics and information, and has not been updated.• From the perspective of the United States, UN agency CDPs based on a fundamentally flawed Framework could have implications for UN activities on the ground. We expect UNICEF to provide a clear explanation as to how it intends to mitigate the risk associated with the implementation of this CPD vis a vis the Strategic Framework in the following areas:• First, the CPD and its implementation should adhere to the “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. Footnote #32, which reads <i>“The Government of the Syrian Arab Republic does not accept the document titled ‘Parameters and Principles of UN Assistance in Syria,’”</i> effectively	
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	<p>negates the possibility of implementing the CPD within the guidance of these Parameters and Principles. The United States requests the deletion of Footnote #32 and seeks clear assurances and explanations from UNICEF as to how it intends to implement this CPD in line with the Parameters and Principles.</p> <ul style="list-style-type: none">• Second, UNICEF country and community context analyses to inform both the public and its own program decision-making must reflect all stakeholders' input and the impact of armed conflicts on the country and local communities.• Third, UNICEF management must recognise and acknowledge that the regime is responsible for the continued conflicts and violence also poses serious risks to UNICEF work in country through pressure and threats to deviate from UN values and principles. UNICEF management must institute a system to mitigate such risks and to resist regime pressure and report to the Board whenever it happens. This also includes risk mitigation efforts to address well-documented examples of government corruption, diversion of aid to favoured communities, and profiting through exchange rate arbitrage.• Fourth, no development or reconstruction activities can take place that will genuinely benefit the Syrian people, not the regime, until all Syrians have reached	
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	<p>a comprehensive peace process and an inclusive political settlement in line with Security Council Resolution 2254. The United States would like a clear explanation as to how the UNICEF intends to implement this CPD in line with Resolution 2254.</p>	
<p>Comments on specific aspects of the draft country programme document</p>	<ul style="list-style-type: none"> ● We ask UNICEF to consider issues impacting children, especially girls in Syria that are not mentioned in this Country Program Document including: [1] children associated with armed forces and armed groups; [2] the issues related to children in detention; [3] the use of hormones to encourage early puberty and child marriage; and [4] the ongoing rates of filicide and femicide. ● We would also appreciate seeing UNICEF refer to what programming will occur to support children in detention and Children Associated with Armed Forces and Armed Groups and reference any advocacy to be done on these issues as well. ● We'd encourage UNICEF to integrate and prioritize protection from sexual exploitation and abuse across all its programming and operations - and in particular consideration of the substantive protection risks that are pervasive across Syria, and the nature of the context being so permissive to SEA being perpetrated, especially against children and women. ● The deteriorating maternal and child health outcomes in Syria are alarming: an increase in the numbers of child births occurring outside health facilities, a sharp 	

	<p>rise in preventable newborn and child deaths, significant declines in the coverage of the most basic diphtheria/tetanus/pertussis (DPT) vaccine, and frequent measles outbreaks. Against this backdrop, UNICEF’s focus on restoring access to routine immunization throughout the country will be paramount.</p> <ul style="list-style-type: none">● Wherever feasible, UNICEF should also give highest priority to helping improve the availability of reliable data on current health indicators, including on the number of COVID-19 cases/deaths and COVID-19 vaccines administered.● Noting the destruction of health system infrastructure throughout the country, UNICEF’s efforts over the short-term would be best focused on helping to restore access to basic primary health care services, particularly at the community level.● It will also be important to ensure that UNICEF's activities under this CPD are intentionally designed in line with its Linking Humanitarian and Development (LHD) Procedure and related best practices, with a view to maximizing opportunities for strategically linking humanitarian and development activities wherever feasible and appropriate.● Paragraphs 2, 10, 11, 15,21, 28a, 44: Please change from crisis to humanitarian crisis.● Please reference in the CPD the legal age for marriage, for both boys and girls, in Syria.	
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	<ul style="list-style-type: none">● Paragraph 10: Please clarify what types of alternative water sources civilians are relying on for water.● Paragraph 19: With regard to COVID-19, will the UN undertake additional assessments regarding critical needs and longer-term assistance needs? Please clarify.	
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