

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.

	Delegation's comments	Response(s)
General comments		
<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	The CPD for the Syrian Arab Republic, as is the case for other CPDs and in line with the QCPR and UNDS reform requirements, is aligned with and derived from the Strategic Framework, as validated by the RESIDENT COORDINATOR. As referenced in Paragraph 23 of the CPD, UNICEF operates fully in line with the document titled, "Parameters and Principles of UN assistance in Syria", which recognize that reconstruction will only be possible once a credible political solution, consistent with UNSCR 2254 and the Geneva Communiqué, is firmly underway but also that assistance is

	<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>to be prioritized based on the needs of the population, with a particular focus on the needs of vulnerable children, families and communities, in a manner that protects human rights and child rights as an outcome, and that such assistance be delivered in a fair, equitable, non-discriminatory and non-politicized manner.</p> <p>While UNICEF is not moving towards normalization, development or reconstruction, the CPD represents a shift towards resilience focused/early recovery approaches, as also requested by Member States through the UN Security Council Resolution 2585 (2021). UNICEF’s – as well as the wider UNCT’s Approach to Resilience Assistance – is focused on more multi-sectoral, integrated, and localized approaches that responds to addressing the children, families and community’s needs and strengthens their resilience. While, at the same time empower them and promote their participation. UNICEF main goal is to ensure that resumption and no disruption of basic social services and to create demand for these services.</p> <p>In order to reach the most vulnerable children at scale and in a sustainable manner, UNICEF must work to reinforce pre-existing system benefitting children and families at community level.</p> <p>Thus, UNICEF overall focus is on ensuring sustained, equitable, inclusive and safe access to critical basic services in areas with a high severity of needs and on strengthening child rights components.</p> <p>This ensures that assistance is prioritized based on the needs of the population and that UNICEF programming abides by the “Parameters and Principles of UN Assistance in Syria” calling for a “human-rights based approach, including participation, empowerment, local ownership and sustainability.”</p>
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	<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>	
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<i>CPD-level comments & questions</i>		
	<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>Risk management description has been reviewed to better reflect UNICEF’s risk management system in paragraphs 46-51.</p> <p>UNICEF in Syria has made significant investment in assessment of violations and vulnerabilities that children’s and their communities face and risk management capacities drawn from its robust monitoring system. While humanitarian programming relies on the continuous and forward-looking assessment and mitigation of risks, UNICEF collects information from the field to manage risks in a timely manner to ensure its ability to deliver assistance with full respect to humanitarian principles. On this basis, UNICEF continuously reviews and assesses the risks associated with its operations and programming to ensure its ability to deliver assistance in a neutral, impartial, and independent way that upholds a human-rights based and Do No Harm approach. In these efforts, UNICEF’s extensive field presence, evidence based and strong advocacy, close monitoring and continuous, close engagement with communities are critical components.</p> <p>UNICEF conducts due diligence verifications for implementing partners with whom it works. It also utilizes the Harmonized Approach to Cash Transfers, a risk-based management framework for cash transfers to implementing partners. This ensures partners are assessed for financial management capacity to determine the overall risk rating and assurance activities. UNICEF conducts assurance activities and ensures that recommended actions are taken to strengthen the partner’s capacity and lead to management actions. UNICEF is also an active member of the UN Humanitarian Country Team which discusses and reviews risks and dynamics affecting humanitarian response in Syria as coordinated also with the Resident Coordinator Risk</p>

		<p>Management Unit. Also, regional dynamics are informed by UNICEF’s Regional Office.</p> <p>UNICEF has four complementary and triangulated programme monitoring modalities. First, UNICEF implementing partners conduct their own monitoring and submit progress reports. Second, independent third-party monitors then impartially verify implementation using prescribed checklists. Third, UNICEF staff and third-party technical facilitators conduct programme monitoring visits to assess progress and quality of results, and identify constraints and adaptations required. Feedback mechanisms are the final pillar of monitoring, including a complaint mechanism/service line, suggestion boxes, beneficiary surveys, focus group discussions and post-distribution monitoring surveys.</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>As referenced in Paragraph 23 of the CPD, UNICEF operates fully in line with the document titled, “Parameters and Principles of UN assistance in Syria”, and the footnote has been amended to read the following: “The Government of the Syrian Arab Republic was not consulted on the “Parameters and Principles of UN assistance in Syria”.</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>	<p>UNICEF in Syria has made significant investment in assessment of violations and vulnerability that children and their communities face and risk management capacities drawn from its robust system. While humanitarian programming relies on the continuous and forward-looking assessment and mitigation of risks, UNICEF collects information from the field to manage risks in a timely manner to ensure its ability to deliver assistance with full respect to humanitarian principles. On this basis, UNICEF continuously reviews and assesses the risks associated with its operations and programming to ensure its ability to deliver assistance in a neutral, impartial, and independent way that upholds a human-rights based and Do No Harm approach. In these efforts, UNICEF's extensive field presence, evidence based and strong advocacy, close monitoring and continuous, close engagement with communities are critical components.</p>
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