

**NGO intervention on Programme of action: Mechanisms for burden-and responsibility-sharing (Part III.A)**

**Agenda item 2**

Dear Chairperson,

This intervention attempts to reflect a diversity of views within the NGO community.

To start with, we welcome details on various responsibility-sharing mechanisms. The linkages between the different elements at the global and national or regional levels are now better defined, and more clearly linked to Part B of the programme of action. We also note that these mechanisms are gradually taking shape, although some elements will still require further clarification. As a start, we would suggest that producing an updated flowchart on burden- and responsibility-sharing mechanisms would help in better understanding the proposed system. NGOs particularly appreciate the second draft's strong emphasis on partnership and participation and commend a more developed section on this.

At the same time, the fundamental question of how the voluntary nature of contributions will lead to a broadening of the support base still looms. To ensure we move beyond 'business as usual', expanding the number of States and other actors that can provide assistance, protection and solutions to refugees will be vital. A fundamental question we all need to consider is whether the mechanisms proposed will bring the level of additionality required. As the text currently stands, we wonder whether there are sufficient tools and stimuli to ensure more actors will step up their engagement. Aware of the constraints a legally non-binding nature of the compact presents, merely relying on 'good faith and common trust' is not a reliable indicator of predictability and equity. Responsibility-sharing mechanisms, therefore, will have to create incentive structures for a broader number of States and other actors to engage. Such incentives obviously need to be matched with accountability for protection and must give due consideration to the individual preferences and choices of refugees themselves. Unless this is addressed, we fear, the goals of the GCR will remain elusive.

More specifically, we note that the renamed **Global Refugee Forum** will now be held every four years from 2021 onwards. As we highlighted in our previous interventions, we believe regular, high-level ministerial events will be crucial to ensure refugees remain at the centre of political discussions. Co-hosting of such meetings by one or more Member States will elevate the profile of these discussions, and is welcome. However, we would like details on the criteria to select States as co-hosts and how potential 'pledging fatigue' may be mitigated. The involvement of the UN Secretary-General could also give the forum a more universal character. We welcome the details about the different forms of pledges and contributions envisaged and the clear message that those will have to go beyond financial aspects. We would suggest adding that these meetings must aim at mobilising a wide range of pledges encompassing trade concessions, debt relief and diplomatic engagement. This should not lead to States compromising on their core contributions including resettlement and complementary pathways and financial, material and technical resources. Overall, we would also suggest reinserting the notion that a template be prepared to collect and record pledges as only such advanced preparation can ensure actors

engage with predictability and coherently, based on a known methodology geared towards filling identified gaps. The Secretariat serving such a high-level forum must have the political wherewithal to mobilise political interest of States in a way that enhances protection and solutions for refugees. We also recommend establishing a civil society platform, bringing together NGOs, refugee-led organisations and the private sector, to participate in organising the forums and report on progress. Tracking pledges and developing progress reports will be equally important to ensure adequate follow-up and accountability. Having a defined template would also help in tracking pledges.

With regard to **national arrangements**, we take note of the emphasis on national leadership. Government leadership is indeed essential. For consistency purposes, and because managing a multi-stakeholder response to refugee situations constitutes a new *modus operandi*, we recommend, however, that the programme of action sets basic parameters for the ‘national arrangements’. One parameter could be inclusiveness of people of concern, local authorities and leaders, civil society and private sector actors in national coordination and governance structures; another parameter could be the establishment of an accountability framework around ‘comprehensive plans’; and a third parameter could be area-based approaches to planning and implementation as this facilitates better opportunities for local actors to engage.

We appreciate more details on the added-value of the **Support Platform**, highlighting its role in supporting a comprehensive, multi-stakeholder and solutions-oriented response. We note that its activation and composition will be context-specific. Linkages with nationally or regionally-defined comprehensive plans are positive, and may allow for customised responses, mobilising a critical group of stakeholders invested in the situation. However, as humanitarian emergencies so painfully show, allocation of support and resources remain highly politicised, and situations where political will is lacking are swiftly ‘forgotten’. Many CRRF contexts too remain woefully underfunded. In short, a context-specific approach, while presenting some distinct advantages, may not always lead to predictable and additional support. The proposed triggering process also needs to be streamlined to ensure activation in a timely manner. In particular, making the activation of the Support Platform conditioned upon a formal request from host countries may not always lead to a speedy response. To ensure predictability and sustained political engagement over time, safeguard measures such as establishing standby capacities and resources at the global, regional and national levels should be considered. In this regard, we note that the Platform will constitute an ongoing effort, and would welcome precision on how its sustainability will be accomplished. Detailing which standby arrangements the Platform would draw on could also be useful. Moreover, how the Support Platform would complement existing coordination mechanisms, including CRRF arrangements, will need to be further elaborated, otherwise we risk accumulating structures, and in the process diluting accountability towards achieving collective outcomes. As such, the various responsibility-sharing mechanisms should be guided by the principles of subsidiarity and complementarity, with the aim of supporting institutions and organisations working closest to refugees and host communities.

**Solidarity conferences** may generate political interest and mobilise additional resources. But NGOs worry that relying too often on such conferences goes against the push for flexible and unearmarked funding. A proliferation of such events may quickly lead to fatigue if it continues to rely on a limited cohort of States.

**Key tools for responsibility-sharing** are vital if the GCR is to accomplish its goals of mobilising and sustaining additional resources and capacities. In this regard, we welcome references to explore

innovative financing schemes mentioned in the High-Level Panel Report as well as an increased role of the private sector. Even so, current proposals do not guarantee that additionality will materialise. It relies too much on risk-averse actors including international financial institutions and the private sector to generate new resources, although we recognize efforts to provide added details on additionalities the private sector could bring. The recently announced Platform bringing together seven multilateral development banks to collaborate on forced displacement, could be positive in so far as it brings additional resources. Welcome also are calls to increasingly provide development resources in the form of grants, and we hope this can indeed bring dedicated development resources “over and above regular development programmes”. Remittances by diaspora communities to refugees, returnees and internally displaced persons also amount to significant sums, and these could be better harnessed for countries of origin. In general, we recommend that the important role of diasporas is explicitly recognized in the programme of action. We also note that the Countering Violent Extremism agenda has led to legislation that hinders transferring money to conflict areas. As such, efforts must be made to ease bank transfers including through de-risking measures.

The compact’s emphasis on drawing in development assistance at the onset of displacement remains one of its key novelties. Such support is essential for host States to expand public services, which benefits both host communities and refugees. Investments in sports and cultural events are also vital in promoting integration and development of skills for both refugees and host communities. Yet, humanitarian assistance remains one of the few means to assist refugee populations trapped beyond State control. Therefore, national arrangements must allow the space for principled humanitarian action to continue. In this regard, we welcome the inclusion of needs-driven financing for humanitarian actors. But we note that references to the Grand Bargain have been removed in response to calls by some Member States. Many of the Grand Bargain commitments, including direct funding to local actors, un-earmarked and increased multi-year funding to ensure greater predictability and continuity in humanitarian response remain relevant, and could be referred in the text.

The **multi-stakeholder and partnership approach** now better defines the role of other actors including UN agencies although we wonder whether more details could be provided about UN actors such as, for example, the United Nations Office for the Coordination of Humanitarian Affairs (OCHA) and the Office of the United Nations High Commissioner for Human Rights (OHCHR). Linkages with the UN development system as well as UN Country Teams are noted, which must also extend to UN operations in countries of origin. We particularly appreciate closer alignment with the United Nations Development Assistance Framework as it will promote refugees’ inclusion.

We also very much appreciate the strengthened language on refugee participation in paragraph 35. More needs to be done to ensure refugees of all age groups, including children and young people, and host communities are involved in shaping national arrangements via consultative processes, policy dialogues, the design and implementation of programmes as well as follow-up, evaluation and accountability mechanisms. However, age, gender and diversity-sensitive participation of refugees and host communities needs to be further mainstreamed at all levels in a way that allows them to influence decisions. Dialogue between local actors and refugees should be facilitated to promote understanding and peacebuilding in the countries of asylum. In this regard, refugee and host community participation should be a continuous and ongoing process. The global compact on refugees must lay down firm commitments to devote resources, both financial and technical, to advance refugee and host community participation and leadership. At the same time, responsibilities of each stakeholder will have to be clearly defined so that accountability is ensured. Collective outcomes or results frameworks for

comprehensive plans will be essential to establish joint direction and mutual targets among stakeholders.

Reference to the important role of national parliamentarians is also vital in negotiating policies and budgets inclusive of refugees. The role of media in strengthening social cohesion is crucial owing to their power of shaping perceptions. We also appreciate the additional details on public-private partnerships in paragraph 42, including the need to advance standards for ethical conduct of private sector actors in refugee situations; however, more concrete reference to applicable legal frameworks and guidelines would be helpful here.

We acknowledge that the **data and evidence** section now attempts to strengthen data protection standards, and particularly appreciate references to the principles of necessity, proportionality and confidentiality. We would reiterate that the programme of action should make specific reference to the need to adopt a privacy-centric and human rights-based approach to all aspects of data collection. All data must be collected with the express and informed consent of refugees. And refugees who are not comfortable with sharing information should not be penalised by withholding their access to services. Collection of qualitative data could also be privileged to bring out the nuances and variations in refugee experience. We continue to note that data collection and evidence in support of local integration is acutely missing. Availability of robust and interoperable data, disaggregated by sex, age, disability and diversity, across the displacement continuum, is vital to afford protection to refugees in host countries and ensure their social inclusion.

Finally, for a fair system of responsibility-sharing, we support the proposal to measure the impact of hosting, protecting and assisting refugees and appreciate that the reference to ‘costs’ was removed from the text. This will help ascertain the contributions States hosting large refugee populations make, although certain aspects such as the good will and compassion of host communities is not always quantifiable. We also welcome the proposed technical level discussions, which will be useful to define the parameters of measurement. NGOs would be eager to contribute to this exercise. We reiterate that this measurement should also value the contributions of refugees in enriching the cultural, social and economic fibre of host States.

Thank you, Mr. Chair, for the opportunity to offer comments on these key aspects of the programme of action.