NGO Statement on the Comprehensive Refugee Response Framework (CRRF)

This statement has been drafted in consultation with, and is delivered on behalf of, a wide range of NGOs. It aims to reflect the diversity of views within the NGO community.

We would like to start by making three overall comments on the progress of the CRRF:

**First**, we warmly welcome the decision to implement the CRRF in a number of new countries, such as Chad and Rwanda, as well as Afghanistan—which represents the first Asian country to adopt the new approach and the first country of origin where the CRRF is rolled out. Two years after the New York Declaration, we see these additions as a clear indication that refugee-impacted nations are increasingly committed to achieving the CRRF objectives and we look forward to working with UNHCR and other stakeholders to contribute to the full implementation of the CRRF in all large-scale refugee operations worldwide.

**Second**, we note that a truly multi-stakeholder engagement and improved coordination mechanisms are still needed in most countries where the CRRF is being implemented. In particular, we are dismayed that refugees, host communities and local actors, including local authorities, continue to be largely excluded from designing and co-creating comprehensive refugee responses; in fact, many local actors have expressed low awareness of global and national level decisions and have therefore not fully embraced necessary changes at the subnational level. We call on UNHCR and concerned governments to prioritize raising awareness among and ensuring the full involvement of these groups in the CRRF decision-making process—it is essential to its success. UNHCR and partners must also ensure that new in-country steering groups for CRRF implementation are established and that they are not duplicative but streamlined with other critical processes, such as World Bank financing for refugee host countries and national development planning; as humanitarian and development efforts are brought to bear in refugee response situations, improved coordination mechanisms will be needed. In addition, at the global level, we regret that the UNHCR-IFRC-NGO CRRF Reference Group, which offered a platform for identification of positive practices, mutual learning and exchange, and monitoring across CRRF contexts, has slipped into abeyance. We are keen to see this mechanism revived and used to its fullest intent.

**Third**, while important steps are being taken to expand the rollout of the CRRF, not enough international support is matching those efforts. Financial pledges remain largely unfulfilled, third country options are stalled, and too little resources are flowing from the private sector and other actors. We continue to welcome the World Bank’s support for programs aligned to country objectives under the CRRF; however, we are deeply concerned by the lack of other development donors supporting the Framework. We urge the quick adoption and implementation of the Global Compact on Refugees in the coming weeks to ensure a
meaningful shift in the mobilisation of CRRF resources by a wider range of actors, including development stakeholders.

We also wish to take this opportunity to reiterate the over-arching need to build a **strong monitoring and accountability framework for the CRRF**, in line with what is being agreed to follow up and review the Global Compact on Refugees (GCR). In this sense, we recall the recent discussions on monitoring the impact of the CRRF held at the annual UNHCR-NGO consultations in Geneva in June. Going forward, as the CRRF is part and parcel of the GCR, we call for the development of a set of GCR collective outcomes, targets, and measures in the coming months, as well as for the establishment of a reliable baseline to measure the impact of hosting, protecting and assisting refugees, as agreed at the end of the GCR consultations process. These outcomes, targets and measures, including baselines, should be fully inclusive to ensure different vulnerable groups within refugee and host communities are reached as part of the GCR and CRRF. NGOs stand ready to share their expertise in both the monitoring and impact measurement processes.

In looking at regional situations, we would like to share the following observations and recommendations:

We welcome the **two regional workshops** held by UNHCR in Quito, Ecuador and Nairobi, Kenya in June to focus on the inclusion of persons of concern in National Development Plans and UN development planning frameworks (UNDAFs). Given the relevance of the topic, we hope future workshops will also be open to other stakeholders beyond UN staff, including refugees and civil society organisations, as there is still little clarity on the integration of refugees in the implementation of Agenda 2030.

With regard to the **IGAD plan of Action** on the Somali Situation in East Africa, we urge the establishment of adequate monitoring mechanisms for host countries’ IGAD actions plans and commitments. We welcome the additional funding of USD 3 million by the Somalia Development and Reconstruction Facility (SDRF) for voluntary returns in the south-west state of Somalia in partnership with the Federal Government of Somalia, Kenyan officials and international NGOs. At the same time, we call for adequate monitoring mechanisms to ensure these returns take place in a sustainable way and in conditions that are safe, dignified and voluntary.

In **Central America**, we applaud the establishment in June of an annual follow-up mechanism for the implementation of the CRRF equivalent in Central America and Mexico, the **MIRPS**, by the Organisation of American States in collaboration with UNHCR. This much needed mechanism will track national commitments for the period 2018-2020, contributing to the exchange of good practices in the region. As the NGO community, we stand ready to engage in this monitoring exercise, starting with the first meeting that is scheduled to take place in Washington, D.C. this autumn.

**In Asia and the Middle East**, we cannot help but notice the lack of CRRF implementation in most of the region, particularly in response to the Syria and Rohingya refugee situations. Although NGOs have not been engaged so far, we look forward to working with UNHCR and other stakeholders on the roll-out of the CRRF in Afghanistan as a first important step to extending the CRRF application in support of the massive refugee populations in the area. Similarly, we encourage European Member States to adopt a consistent approach by implementing the CRRF when addressing refugee movements in Europe.
At the country level, NGOs would like to make the following observations and suggestions:

- We welcome the roll-out of the CRRF in Chad as of May 2018. In particular, we strongly support the decision by the Ministry of Education to declare 108 schools located in 19 refugee camps and settlements official Chadian schools. This exemplary measure will enable refugee children to study alongside Chadian students from their host communities, allowing for more seamless integration.

- In Ethiopia, we welcome the steps that are being taken to revise the 2004 Refugee Proclamation, allowing refugees of all nationalities to move more freely, and access schools and formal jobs. The Proclamation should be swiftly passed so that education and livelihoods programs can take advantage of the new policies. We also welcome the development and discussion of the National Comprehensive Refugee Response Strategy, which we hope to see finalized soonest to promote a common vision and a clear strategy for the implementation of the pledges in Ethiopia. We would also reiterate the concerns raised in the June 2018 NGO Statement on the CRRF regarding the lack of engagement of sub-national stakeholders, as well as the lack of quality benchmarks to ensure sustainable outcomes for displacement-affected communities. These concerns are yet to be addressed and we urge ARRA and UNHCR to take the lead in communicating and engaging with NGOs to maintain momentum in the advancement of the CRRF. Furthermore, we recommend that UNHCR, ARRA and other actors, including the World Bank, streamline their multistakeholder engagement process to ensure there is a clear decision-making process and that decisions about financing, policies, and programs aimed at supporting refugee and host communities include different levels of government, regional bodies, refugees, and NGOs. These leading institutions should also ensure projects adequately reflect the data and evidence base, for instance on refugee and host community livelihood skills and needs in the immediate and longer-term.

- In Djibouti, the developments towards advancing the CRRF have been slow and we therefore reiterate concerns raised in June. Specifically, we note the lack of adequate engagement of community actors, INGOs and line ministries and call for an improved and inclusive National Action Plan. Furthermore, inadequate funding and poor coordination continue to lead to service and protection gaps.

- In Kenya, we very much welcome the inclusion of refugees, stateless persons and migrants in the UNDAF for 2018-2022, in support of Kenya’s Vision 2030 and its Medium Term Plan III. From this starting point, we hope that Kenya will continue to develop more broad and systematic inclusion of refugees into national and county level development planning with a whole of government approach. We also wish to note other important steps taken by the Government to foster inclusion, through its support for the broadcast of the world’s first ever TED talk in a refugee camp (Kakuma, on 9 June) and the organization by Kenya’s Refugee Affairs Secretariat (RAS) of a discussion on refugee inclusion as a tool for protection and more sustainable solutions with key CRRF implementers, such as the International Finance Corporation, academia, the European Union and UNHCR. We appreciate the inclusion of national NGOs in the technical working group, although we note that this process has stalled since last April. We encourage the Kenyan Government to develop whole-of-government strategies to implement the CRRF. Crucially, we urge development donors to provide both technical and financial support as at the moment many humanitarian donors are retreating while the Government has yet to clarify what other kind of support will be provided in their place.

- Similarly, in Rwanda we take note of the ‘whole-of-government’ workshop held by the Government on 4 June to mark the official launch of the CRRF. We particularly support the decision to align the application of the CRRF with the Strategic Framework for Refugee Inclusion, which is a costed plan
identifying policy changes and a related funding strategy. We look forward to participating in the upcoming meeting and consultations with development partners, refugees and host communities and we hope these consultations will happen regularly, in line with a truly multi-stakeholder CRRF approach.

- With regard to Tanzania’s official withdrawal from the CRRF, we once again call on all stakeholders to seek to identify the reasons for the change of course and discuss the way forward, particularly for the large number of refugees hosted in the country. We remain concerned that the current situation may set a dangerous precedent for other CRRF countries.

- In Uganda, we welcome the CRRF advancements in the key sectors of education, health, and water and environment. Ongoing efforts to develop a settlement strategy and a response plan for livelihoods and economic recovery for refugees and host communities are equally critical, and the consultative, whole-of-government and whole-of-society process of developing the strategy is crucial and needs to be continued. In this regard, we appreciate the inclusive way the CRRF Secretariat manages these processes and remain committed to contributing to these response plans. We would also highlight that key role that NGOs are playing in supporting implementation of the CRRF, and have pooled resources to continue our active support until the end of 2019. Still, we find that more could be done to foster better alignment of and greater inclusion of different levels of government in decision-making processes for the CRRF implementation and World Bank financing. Critically, we are extremely concerned with the declining funding levels for the response, which not only jeopardize basic service delivery, but also question and undermine the credibility of the CRRF as such. Without an infusion of resources to support medium and longer term solutions for refugees and Ugandans, Uganda’s progressive response model is at risk.

- In Zambia, we welcome the multi-stakeholder consultations held by the national Office of the Commissioner for Refugees in the northwestern district of Kalumbila, and the needs mapping for short, medium- and long-term interventions.

- Moving to the Central America region, in Belize we support the creation of three inter-ministerial working groups to focus on the MIRPS priorities identified by the Government: profiling and data collection, quality of asylum procedures and livelihoods and social development in communities.

- In Honduras, we welcome the joint advocacy efforts by UNHCR and the national Episcopal Conference in support of the MIRPS.

- In Mexico, the Government is taking promising steps towards greater inclusion of refugees in national systems and public programmes, including issuing a National Population Registration number to asylum-seekers and engaging refugees to promote the national Regulation on Labour Equity and non-Discrimination.

We look forward to further discussing these issues through a multi-stakeholder dialogue that puts NGOs, refugees and host communities at the centre at local, national, regional and global levels. Only then will the CRRF roll-out—and ultimately the Global Compact on Refugees—be able to adequately address the unique needs, constraints and opportunities of refugee populations.

Thank you, Chair.