NGO Statement on the Comprehensive Refugee Response Framework

This statement has been written 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.

Before reflecting on the progress in rolling out the CRRF in specific regions, we would like to make five overall comments:

First, as the Global Compact on Refugees is taking shape, it is an opportune moment to recall that the Comprehensive Refugee Response Framework is our new reality. We welcome the recent decisions of the governments of Zambia, Chad, Kenya and Rwanda to implement the CRRF, and we strongly believe that the CRRF should now be applied in all refugee operations worldwide: In Central Asia, in South and South-East Asia, in North- and West Africa, in the Great Lakes region, in the Middle East, in Europe, in North America, in Asia and in the Pacific. We look to UNHCR and all States hosting refugees, to launch context specific roll-outs where they are not yet in place. We recommend starting the process by undertaking a multi-stakeholder comprehensive analysis with a baseline for the four CRRF objectives as described in the New York Declaration, and subsequently formulate strategies with multi-stakeholder participation and contributions at the core, notably including refugees and host communities.

Second, we need to expand the implementation of the CRRF approach in situations of mixed movements. We specifically call for systematic implementation of the CRRF approach in Libya, Niger, Sudan, Yemen, Turkey, Malaysia and Thailand where particularly large numbers of potential refugees are moving in mixed migration flows, and where better access to quality asylum procedures is needed.

Third, we observe as a general trend that effective ways of engaging a wide range of actors are still needed in CRRF roll-outs. In particular, refugees, host communities and local actors, including local authorities, continue to be largely excluded from designing and co-creating comprehensive refugee responses. We are convinced that this need strong and immediate attention in both ongoing and forthcoming roll-outs, and that UNHCR alongside partners has a very important role to play as a co-facilitator of multi-stakeholder responses.

Fourth, most CRRF roll-outs are not matched with adequate international support. Contrary to the CRRF approach and the Compact purpose more generally, pledges remain unfulfilled, few extra resources have been mobilized, third country options have not been expanded, and resources and skills from the private sector and other actors have not yet been convincingly raised to date. It illustrates the need for new approaches, and NGOs are keen to see the new instruments developed with the aim that the Global Compact on Refugees deliver a better balance between national level efforts and international support.

Fifth, we would like to see a much stronger alignment with and links between CRRF roll-out and other relevant change processes. In particular, we encourage governments and UNHCR to use the CRRF as
a basis to realize sustainable development goals and to promote New Ways of Working. Working with collective outcomes and joint targets for enhanced protection and expanded solutions is a meaningful way to engage a wider range of stakeholders in the response.

Moving to the situations where governments and regional organizations have been progressive and brave enough to front-run this promising change process, we have the following observations and recommendations:

In relation to the IGAD plan of Action on the Somali Situation grounded in the Nairobi Declaration, its Plan of Action and Results Framework, we warmly welcome the reaffirmed commitment expressed by IGAD Member States at the inter-ministerial meeting in Nairobi in March 2018 to implement the CRRF and complete national action plans. IGAD continues to be a vehicle for political progress towards comprehensive refugee responses, exemplified by the Regional Conference on Refugee Education and the most recent Declaration from IGAD’s Health Ministerial Committee.

We would like to highlight the fruitful collaboration between IGAD, its Member States and NGOs in operationalizing and implementing the Nairobi Declaration. Thanks to the space for open dialogue and learning created by IGAD, NGOs have been able to support the roll-out.¹ This has added to the production of comprehensive solutions analyses in Ethiopia and in Somalia in collaboration with government authorities.

In Somalia, NGOs welcome the National plan of action on Durable Solutions for 2018-2020, which we believe is a solid basis for instituting government leadership for CRRF implementation in Somalia. We look forward to the adoption of the National Policy on Displacement and we appreciate the steps that have been taken to align it with Somalia’s National Development Plan. We further appreciate the CRRF awareness-raising sessions that were completed earlier this year led by UNHCR in Galkacyo, Garowe, Bosaso and Hargeisa and those forthcoming Kismayu, Baido and Beletwein. We are concerned, however, that the CRRF remains abstract with still limited engagement by the Federal and Regional governments. As such, there is need for continued support to ‘localize’ the framework, taking into account local capacities and structures. We generally recommend to further improve coordination and synergies between the different ongoing processes that all contribute to the CRRF vision for the Somali situation.

In Central America, the Comprehensive Regional Protection and Solutions Framework, MIRPS, continues to advance. A convening held in Panama on June 11th aimed to understand the status of the national chapters. In the specific case of Costa Rica, the government has taken first concrete steps to realize elements of the Action Plan by allowing asylum seekers access to temporary documentation while they wait for eligibility interviews. Providing legal documentation to asylum seekers is the key to mitigate numerous protection risks, and we much welcome this progress in Costa Rica. Furthermore, we also warmly welcome the recent resolution adopted by the National Council for Refugees to provide migration status on humanitarian grounds as a complementary form of international protection. This progressive step to safeguard non-refoulement will benefit a large number of Venezuelans.

As a general observation, the regional CRRF roll-outs illustrate the potentials of regional approaches and the role that regional organizations can play in fostering practical ways to promote comprehensive approaches. Both cases illustrate how civil society can be engaged and add value to a regional approach.

With regards to the country level roll-outs, NGOs would like to make the following observations and suggestions:

¹ e.g. through the Regional Durable Solutions Secretariat (ReDSS).
In Uganda, NGOs welcome the tangible progress achieved in rolling out the CRRF. Notably, the recently adopted Education Response Plan shows the way for integrated service delivery planning with the Ministry of Education in a leading role. NGOs will continue to support its implementation as well as the development of similar forthcoming plans in the sectors of water, health, environment and livelihoods. Further, we are encouraged to see the recent decision made by the OPM to make the Ministry of Local Government co-chair of the CRRF steering group as it is a first constructive step to overcome the pertinent coordination challenges between refugee response and development planning. NGOs look forward to and will continue to support an alignment between service delivery to refugees and hosting populations at district level. Moreover, NGOs are committed to support a strategic approach to localization as part of the CRRF process.

We would like to make two critical observations that we recommend UNHCR act on in Uganda: First, the Refugee Advisory Forum is not yet functional. It needs to be speeded up, and a resourced plan for empowerment and capacity building of refugee representatives need to be developed to make sure that it becomes a truly representational body. Secondly, UNHCR can indeed do more to re-focus its operations to its core mandate and invite other and more specialized actors to take the lead on planning and implementing development activities such as vocational training, livelihoods and water infrastructure. We are encouraged to see, however, that UNHCR is recently taking this approach more convincingly.

In Ethiopia, NGOs welcome the forthcoming adoption of the revised Refugee Proclamation. This step is essential to provide the legal basis to operationalize the 9 pledges. Over the past weeks, we have observed a very rapid launch process at the sub-national / regional level. While we appreciate the dedication to achieve progress, we are also concerned that this approach might fail to establish the required buy-in from sub-national stakeholders. Indeed, the level of engagement in the launches has been inconsistent, with attendance from the regional president in Gambella to significantly less high level governmental presence in Jijiga. NGOs are convinced that a sub-national implementation requires thorough planning to ensure that local stakeholders buy-in, and that CRRF action addresses the complex yet very contextualized local development challenges. Hence, NGOs call for scaling up planning and consensus-building for sub-national implementation. The same observation pertains to the sectoral workshops at national level that need to be designed in a way that more effectively produce recommendations to be taken forward by the Steering Committee. Also here, more thorough planning will be welcome. Further, NGOs strongly support a further development of the pledges beyond quantitative targets to also encompass quality benchmarks. We support broadening the scope of the basic services pledge beyond health and nutrition to also include WASH, shelter, energy and other social services.

In Djibouti, NGOs welcome the start-up of the steering committee. We note with concern the limited representation of host community actors, INGOs and the seemingly limited engagement from line ministries to date. The National Action Plan is a good starting point, but needs a joint funding and coordination strategy that can allow different actors to contribute in achieving its goals. Excluding INGOs from coordination has led to inadequate hand-over of service delivery functions to the Ministry of Health resulting in service and protection gaps. We recommend engaging civil society organizations more systematically in the CRRF roll-out in Djibouti.

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2 e.g. Oxfam is currently taking this forward on behalf of the NGO community with the support of the CRRF Secretariat.
We sincerely regret the withdrawal by the government of Tanzania, and hope that the decision will be re-considered given Tanzania’s tradition with refugee hosting as well as the prevalent presence and arrival of large groups of refugees in the country.

NGOs warmly welcome the recent decisions by the governments of Kenya, Zambia, Chad and Rwanda to implement the CRRF. We hope that the CRRF can be an opportunity to garner support for the recently rejected Refugee Law in Kenya. NGOs stand ready as partners in the forthcoming roll-outs in all four countries and look forward to being included in the process. We encourage UNHCR to use this opportunity to re-orient itself towards its core mandate and take a facilitating role in fostering development responses.

Finally, building on our initial observation, we encourage UNHCR and States to champion the CRRF also outside Africa and Central America. In context of the Afghan displacement situation, for example, we call on UNHCR and governments to use the CRRF and the forthcoming GCR to prepare for a multi-stakeholder review and new iteration of the Solutions Strategy for Afghan Refugees (SSAR). Similarly, in the Middle East, we look forward to exploring how the GCR can further enhance the 3RP framework and the national Compacts. And in South-east Asia, we look forward to hearing how governments in the region and UNHCR plan to translate the CRRF into policy and response to the Rohingya refugee situation.

In conclusion, NGOs would like to commend States and UNHCR for the immense efforts invested in advancing the CRRF in places where it is implemented. NGOs are committed and ready to engage fully in the process, and to this end, we call for more convincing approaches to mobilize and engage a wide array of actors, including NGOs.

Thank you.