

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

Agenda item 2

Dear Chairperson,

This intervention reflects a diversity of views among NGOs.

First, we appreciate that the responsibility-sharing mechanisms are taking shape. As further clarifications are still needed, we suggest that UNHCR updates the flowchart distributed in March.

A fundamental question at this stage is whether the proposed mechanisms bring the additionality required. Expanding the number of actors that provide assistance, protection and solutions will be vital, but we wonder whether the text includes sufficient tools, incentives and accountability measures to ensure increased engagement.

More specifically, regular, ministerial **Global Refugee Forums** will be crucial to ensure refugees remain central to political discussions. Co-hosting by States will indeed elevate the discussions' profile. However, we wonder how co-hosts will be selected, and potential 'pledging fatigue' mitigated. Welcoming different forms of contributions envisaged – beyond financial aspects – we suggest adding the aim of mobilising pledges such as trade concessions, debt relief and diplomatic engagement. The next draft should reinsert the objective of preparing a template to collect and record pledges. Only such advanced preparation can ensure predictable and coherent engagement and proper tracking. A civil society platform should also be established, including NGOs and refugee-led organisations, to help organize the forums and report on progress.

On **national arrangements**, we recognize the emphasis on national leadership. Since managing multi-stakeholder responses constitutes a new *modus operandi*, we recommend setting basic parameters for 'national arrangements' such as inclusiveness of various actors in national coordination and governance structures.

We appreciate more details on the **Support Platform**. Its activation and composition will now be context-specific, allowing for customised responses. However, we stress that activation should be timely, free from political considerations. To ensure predictability and sustained political engagement over time, safeguard measures such as establishing standby capacities and resources should be considered. Details on how the Platforms complement existing coordination mechanisms will be needed to ensure we do not accumulate structures and dilute accountability towards collective outcomes.

Solidarity conferences may generate political interest and mobilise additional resources. But their proliferation may go against flexible and unearmarked funding and lead to fatigue if it relies on a limited cohort of States.

On **key tools for responsibility-sharing**, we welcome references to the High-Level Panel on Humanitarian Financing and calls to provide development resources increasingly through grants. We hope this can bring dedicated resources “over and above regular development programmes”. However, relying excessively on risk-averse actors may not guarantee additionality. Remittances by diaspora communities could, for example, be better harnessed and bank transfers facilitated through de-risking measures.

The compact’s emphasis on attracting early development assistance remains a key novelty. Such support is essential for host states to expand public services. Yet, national arrangements must allow space for principled humanitarian action. On this, we welcome mention of needs-driven financing for humanitarian actors, but regret the deletion of pertinent Grand Bargain references.

NGOs appreciate the draft’s emphasis on the **multi-stakeholder and partnership approach**, which clarifies the role of other actors. However, we would welcome more details about UN actors such as OCHA and OHCHR and stress that linkages with the UN agencies must also extend to operations in countries of origin.

We also appreciate the strengthened language on participation of refugees and host communities, including children and youth, in shaping national arrangements via consultations, policy dialogues, design, implementation, follow-up and accountability mechanisms. The compact must lay down firm commitments to devote resources, both financial and technical, to those objectives. Age, gender and diversity-sensitive participation needs to be further mainstreamed.

Although data protection standards are strengthened, we reiterate the importance of a privacy-centric and human rights-based approach to data collection. **Data collection and evidence** in support of local integration is still missing. Availability of robust and interoperable data, disaggregated by sex, age, disability and diversity, across the displacement continuum, is vital for refugee protection and social inclusion.

Finally, we support the proposal to measure the impact of hosting refugees. NGOs are eager to contribute to the proposed technical level discussions. We reiterate that this measurement should also value refugees’ contributions.

A detailed version of this intervention is available on icvanetwork.org

Thank you.