

Subject: **Summary of our issues of demand from our positioning on draft JRP 2020 and advocacy in Rohingya response management. For any clarity we refer English detail document.**

a. **Inclusion or revision in draft JRP 2020**

1. Peace building, environment restoration, adolescent and youth, host community, should be considered as a separate sector.
2. There should be the scrutiny role of DC office in the host community sector, all projects should be screened so that there will be a reasonable level of assurance that 25 % of aid money will be utilized for the host community.
3. More clarity on UNDP initiated Cox's Bazar Development plan is needed, especially how the funding will be arranged and how the overlapping will be minimized.
4. There should be an immediate ban on plastic use in camps, there are a lot of alternatives could be used in this regard.
5. Security issues should be integrated with the site or camp management sector.
6. Family planning issues should be priority wise integrated with the Health sector.
7. In respect of implementation management process, ISCG must tell in the JRP on following
  - i. How much % of the money will be spent on local procurement, it should be mentioned.
  - ii. How they will integrate the non-JRP implementations, how they will avoid duplication of resources.
  - iii. How much % of the money will be implemented with local government and local NGOs / CSOs.
  - iv. Must clear how they will implement the localization task force (LTF) recommendations. We recommend that all field operations should be done by local and national NGOs and local government, while UN agencies and INGOs should be limited in monitoring and technical assistance (funding and partnership).
  - v. JRP should be considered as a live document, as the situation is so dynamic and changing that in course of time there will be the scope of changes.
8. There should be inclusion of government operation cost.
9. JRP should clear on what will be the management cost/overhead cost (immediate past Foreign Secretary have had alleged that UN agency management cost is around 65 %, which was quoted in newspaper too) /direct input to the Rohingya family (study has shown that so far per month per Rohingya family aid is \$ 441) and partnership cost, and what is the % of allocation within UN agencies, local NGOs and INGOs.
10. Creating NGO pool fund to promote human rights based local NGOs/CSOs in Cox's Bazar
11. There should be a section on repatriation in the JRP
12. **There should be a section on selecting local and national NGO participation in ISCG sectors and HoSoG through an open and democratic process. Present non transparent and hand pick and wish full selection should be stopped.** We have following concern in this regard.
  - i. An explanation has given that the NGO Platform (NGOP) is the representation of NGOs. NGOP platform is hosted by an INGO, dependent on funding. But in course of time it has created confusion. NGOP have little succeeded to raise voice for local and national NGOs and to increase their partnership. Survey has shown that, local NGOs have further marginalized, i.e. in partnership of projects it is only 8 to 9 % only in Rohingya response.
  - ii. There are clear definition of local NGO in IASC (Inter Agency Standing Committee) and others in view of principles of Grand Bargain agreement. Following those we will plea to take the definition is local NGO meaning in Coxsbazar is that, local NGO who are originated from Coxsbazar. We propose the involvement of local and national NGOs, but preference should be given to local NGOs. UN policy in NWoW is also urges for anchoring the activities to locally sustainable organizations.
  - iii. CCNF is a homegrown network of local NGOs and CSOs in Coxsbazar, have been created much earlier then NGOP, it is not depended on external funding. It has organized not less than 10 dialogue both in national and local level, and also organized social mobilization in local level for peace building and to maximize communication between UN agencies, NGOs, local governments and high level policy makers. ISCG leadership have avoided CCNF in this regard.
13. **For NGO representation in ISCG operation, ISCG should directly communicate with local, national and international NGOs involved in Rohingya response and ask them the elect their leadership representation. Like what have had happened in respect of electing local and national NGO representation for SEG (Strategic Executive Group) as created by UN agencies. UN**

and donors should consider to recognize three distinct nature of NGOs (i.e., local, national and international) which is within the preview of Grand Bargain commitment.

**b. Urging government for thinking on a single authority system and long term policy.**

14. Government should think on there is a need of reorganization of National Task Force (NTF) it should be under Prime Minister Office in view of the gravity of the problem. There should be representation of local Member of Parliaments, Local Upazila Chairman, and Local NGOs/CSOs too.
15. Role of Deputy Commissioner (DC) office in the scrutiny of projects related to the host community.
16. ISCG should be integrated into the RRRC office, with single line management of Rohingya response with RRRC. Financial tracking, monitoring, and planning section of the RRRC office have to be strengthened. ISCG should act as a counterpart. There should be a reasonable role of UN agencies.
17. The government should plea donors to provide her own management cost in the Rohingya response, which should be included in JRP 2020.
18. The government should think to prepare a National Humanitarian Refugee response policy in taking participation of all possible stakeholders including UN agencies and INGOs. In view of the situation, it is going to be a long term protracted crisis, so it is needed to take a long term approach but with a must repatriation approach. We have to understand that the "near term repatriation approach" is hardly working and it is becoming costly for all parties especially for donors will feel fatigued on this in course of time.
19. For each of the projects, during the formulation stage, there should be "pre-assessment and consensus certification" based on need assessment, should be provided by RRRC and DC office, including participation of all stakeholders including Rohingya refugees.
20. The government has recognized the livelihood cost escalation in the district, the recent circular in this regard will give some respite to the government officials. But there should be some measures and projects for the poor segment of the population of the district that they will have some respite in this escalated price situation.
21. We urge to government to think on decision to provide full education to Rohingyas with Myanmar curriculum. The government should also think to allow pre-fabricated vertically extended housing system to minimize congestion. And there should be a level of economic and livelihood activities of the families in the camp so that they will be busy and they can manage life while there are reducing level of aid in the future. These will give a sense of dignity to Rohingyas so that there will be reduce level of desperateness thus they will not take risk of being trafficking. We urge donors to positively engage with government on all these issues and ensure funding in this regard.

**22. Possible long term measures to reducing the cost of Rohingya response operation.**

- i. Reduce maintaining sub-offices in Coxsbazar while there are daily 8 to 10 daily flights for Dhaka Coxsbazar Dhaka.
- ii. All operational staff should be stationed in Ukhiya so that there will reduced travel time cost and traffic congestion in Coxsabazar Ukhiya and Teknaf road.
- iii. To avoid traffic congestion and to facilitate safe movement of local people, there should be an initiative to have a common logistical pool among UN agencies and INGOs.
- iv. Salary level of NGOs staff in Rohingya response has arisen 267 % from the existing NGO salary structure in Bangladesh, it should be reduced so that there will be a coping strategy with reducing level of aid and enhancing chances of survival-sustainability of NGOs/CSOs in Coxsbazar.
- v. There should be a need analysis on how much expatriate is needed and there should be a planned effort to technology transfer and keep the involvement of expatriate should be minimum.

**23. Suggestions on ISCG reform until a single authority system in Rohingya response management.**

- i. Local NGO and local government representation in ISCG sector leadership.
- ii. Inclusion of local NGO and local government representations during dignitaries visit in Coxsbazar, the program should be prepared in consultation with the local NGO and government representatives, so that there will be voices and reflections from locals.
- iii. Introduction of Bangla language in Coxsbazar ISCG operation immediately which was the recommendations from Grand Bargain mission September 2018 too.
- iv. Scrutiny by DC office on host community projects/allocations.

- v. Training and orientation to the all staff and expatriate working in Rohingya response on Grand Bargain commitment, Principles of Partnership, New Way of Working by UN, Aid effectiveness to development effectiveness, local ownership, and local accountability and Local cultural sensitivity
- vi. Inclusion of Local NGO and government representatives in ISCG and HoSoG meetings.

**24. A rule-based, transparent process of partnership treatment by UN agencies and INGOs toward local NGOs to promote locally accountable and sustainable Local NGO / CSOs.**

- i. Our survey shown that among the host community Local NGO partnership projects are only 9 %, while INGOs directly implement 35 %, UN INGO partnership is 23 %, UN directly implement 8 % and UN NNGO partnership is 12 %. In respect of refugee camp Local NGO partnership is also 9 % only , INGO NNGO partnership is 30 %, UN NNGO partnership is 12 %, UN INGO partnership is 21 % and UN directly implement 5 % projects. So LNGO s position in project implementation is very marginal.
- ii. Defining local and national NGOs in view of IASC principles. Locals mean NGO and leadership who are originated from Coxsbazar, in respect of partnership preference should be given to them, but we are not denying the partnership to national NGOs. All filed operation should only be done by local and national NGOs. Role of UN agencies and INGOs should be limited in monitoring and technical assistance only.
- iii. Complain response mechanism and conflict of interest policy in UN agencies and INGOs so that there will be fair practice in respect of partnership selection process.
- iv. There should be a prepared and open partnership policy for the Rohingya response which will be tailored to sustainable response management. The policy should be practice in a transparent way so that there will fair competition and treatment to the local NGOs.
- v. UN agencies and INGOs should be limited to monitoring and technical assistance from Coxsbazar, all the field operation should be given to the local and national NGOs and local government, and preference should be given to local NGOs.
- vi. In the Rohingya response staff salary has been increased by 267% from the existing Bangladeshi NGO salary structure, which is hardly sustainable. This has to revise and a common framework should be prepared in such a way that it will also be adjusted with minimum aid flow.
- vii. The capacity convergence and exchange has to be given important rather than capacity development. A process of on the job training and partnership has to be given priority to develop locally sustainable local NGO / CSO development.
- viii. UN agencies and INGOs should develop a policy so that within the shortest possible time there will be minimum involvement of expatriate through technology transfer. They should also prepare a common logistical pool so that there will be a minimum vehicle and logistical expenditure.

**25. Where aid money goes, no financial tracking and inability to provide vital statistics, how many vehicle and expatriate, approach to minimize the cost.**

- i. ISCG hardly able to provide vital statistics, e.g., how many local employment have created, how much of money spend for local procurement, how much of aid for local, national and international NGOs. There are lot of agencies and NGO who do not report to ISCG. Government / RRRC office has also no system for such financial tracking. It is necessary to avoid duplication, to set priority, to strengthen local economy, to recuperate local damages and to cope with dwindling aid situation.
- ii. Analyzing UN OCHA data we have only succeeded to draw that, since August 2017 and until December 2019, there are per Rohingya family per month aid of \$ 441 ( which is BDT 37,044), there are nothing of clue to identify management cost.
- iii. There was report (When Rubber Hits the Road: Local Leadership in the first 100 days of the Rohingya crisis, by Humanitarian Advisory Group, Australia, December 2017), as they have found 69 % of aid money goes to UN agencies, INGOs 20 % (where the major portion around 7 % goes to ACF), Red Cross 7 % and to NGOs 4 % (where the major portion around 2 % goes to BRAC). **We assume that in course of time portion of UN agencies, INGOs and BRAC has increased and in view of our survey on project partnership, local NGO participation have been further marginalized.**
- iv. It is very difficult to collect different statistics especially on how many vehicle aid agencies and NGOs use in Rohingya response and how many expatriate they use. We have unconfirmed figures that there use of around 600 vehicles and 1354 expatriate in Rohingya response. **Apart from these statistics, to avoid traffic congestion in Coxsbazar and Ukhiya or Teknaf road and to ease the local people movement, there should be common logistical pool as they have agreed in Grand Bargain commitment. And there should be plan to gradual reduction of expatriate involvement toward minimum involvement of expatriate.**