

“JRP 2021: Is It Going Beyond or Business As Usual? “

Comments from local and national NGO representatives in SEG on draft JRP 2021

1. **Introduction:** This is the draft comments from local and national NGO representatives in SEG (Strategic Executive Group) on draft JRP (Joint Response Plan) 2021 in Rohingya Response. We have 10 points related to the process or major proposals. On top of that, section 12 is the additional comments by sectors in a matrix. We believe in positive engagement with both government and UN for Rohingya response, but without abandoning the critical perspective.
2. **Our futuristic approach is the basis of analysis:** The following premises are considered to make comments on JRP 2021:
 - (i) Consider Rohingya crisis as an indefinite protracted crisis. Ensure human dignity until repatriation especially to the youth who are more than 60% of refugee population.
 - (ii) Locals still have positive attitude towards Rohingya refugees what is observed in August 2017. So, there is a possibility to apply Whole of Society Approach (WoSA) in the response. Local NGOs showed examples through advocacy and social cohesion.
 - (iii) Bangladeshi national and local CSO/NGO have gained professionalism and maturity to run humanitarian response and stir the public opinion. Consider IASC definition on local and national organizations. Local CSO/NGO should lead from the front for sustainability, accountability to facilitate a right based society in Cox’s Bazar.
 - (iv) Future Rohingya response need to be able to cope with the reduced level of aid. Continuous and consistent try out should be in place to reduce management cost and enhance direct benefits to affected population.
 - (v) Environment recovery of Ukhiya and Teknaf have to be regenerated in earliest possible time with all necessary steps especially in respect of water and waste management.
3. **Government contribution should be acknowledged, it should be a live document.** Since the beginning government has a contribution in total response management which should be ascertained and acknowledge in the document. The document should also be considered as a live document, as the situation is complex and changing rapidly. Moreover, as local and national NGOs hardly have get approval and commitment for long term projects, they hardly able to meaningfully contribute in the JRP preparation process, whenever they get approval, they must be accommodated in the process. So for better coordination and to uphold the utmost utilization of available resources, the JRP should be considered as a live document.
4. **Participation of locals should be ensured in the total cycle, from planning to implementation and review.** Since the beginning, we along with CCNF (www.cxb-cso-ngo.org) has been raising the issue on participation of local CSO and local government in this total cycle of planning and implementation, especially in ISCG and HoSoG. JRP is the outcome document of ISCG (Inter Sectoral Coordination Group), which is mostly led by expatriates. JRP was initially shared local government representatives in 2018, but it was hardly followed later on. A place cannot be a “safe” place if it is only participated by one sect of people. Rather it is safer when it is represented with all stakeholders including the local actors and when it embodies the philosophy of respect and tolerance to different opinions. The ISCG leadership need to consider the principles of “Democratic Ownership”. It is the reason of “Trust Deficit” among the humanitarian actors in Rohingya response.
5. **NWoW (New Way of Working) have to reflect with right interpretation and LTF (Localization Task Force) and localization roadmap cannot be a forgotten issue.** NWoW has been mentioned in the draft JRP2021. But the right interpretations of it should be mentioned. The main essence of NWoW is to proceed with three dimensions, development, peace and sustainability with all possible actors, especially with the participation of local actors. A great energy is invested from SEG led by UNDP and IFRC with the participation of SCF, Oxfam and others. Centre for Peace and Justice of BRAC University has been engaged to discuss with all parties to produce a road map. They have presented the report to SEG and donors and all leaders in SEG have commented on it. Now it is the responsibility of SEG not only to publish the report but also to initiate the road

map. People who commented on the report and who are also the members of LTF didn't have a chance to see the final document after the inclusion of donors and SEG comments. LTF and its road map is hardly mentioned in JRP 2021. As report is not published yet, we hardly know its recommendations.

6. **ISCG and UN in Bangladesh should be guided by IASC (Inter Agency Standing Committee) policies at least in respect of defining local and national NGO.** We observed that ISCG and UN in Bangladesh hardly recognize the local and national NGO definitions provided by IASC, the highest UN body for humanitarian policy formulation, in view of UN General Council resolution. We have been observing that ISCG and UN in Bangladesh mention "Bangladeshi NGO" without any differentiation whether the NGO is local or national in view of IASC definitions. Since Grand Bargain (2016) commitment has been initiated by UN, we expect the UN staff to be well conversant of it along with its background. IASC provided a policy guideline on localization during COVID 19 and we tried to draw attention of UN Humanitarian Advisors on it and requested to pursue it to all possible stakeholders.
7. **Localization should be a strategic objective as well as a crosscutting issue of JRP 2021.** The following courses of action also could be proposed alongside the protection, gender and disaster risk reduction issues are proposed.
 - (i) Field operation should be implemented by local and national NGOs. INGOs and UN agencies should remain in monitoring, technical assistance and fund raising.
 - (ii) Technology and know-how transfer should take place in a planned and time bound manner so that all positions in INGOs and UN can be taken over by national professionals by 2021.
 - (iii) All communication should be conducted in Bangla especially in field and Cox's Bazar level. Expatriates should also be trained on Bangla communication. It was also a recommendation of Grand Bargain demonstration mission in Bangladesh (September 2018).
 - (iv) All NGO partnership selection should be criteria and policy based in competitive and transparent manner. Preference should be given to locally origin NGOs to create right based civil society in Cox's Bazar. An open competition needs to be created for locally responsive, accountable and sustainable NGO/CSO with good governance. At present the partnership selection practice is mostly handpicked, importing NGOs from the other side of the country having less idea about the local community.
8. **Aid transparency, mechanism for public reporting on where money goes, and plan to reduce management cost are needed.** Only the figures on how much money has come for Rohingya response is shared. But there is hardly any mechanism of public reporting on where the money goes. CCFN has been raising voice to set such public reporting since the beginning. CCFN conducted a rapid appraisal in October 2020 and found that according to the total fund received, approximately \$428 was for per Rohingya family, per month. However, per Rohingya family got direct benefit of approximately \$130 excluding the cost related to external activities like education, awareness, networking and activities like infrastructure. There was an expression from ISCG leaders in the beginning of 2018 that 25% of the JRP related aid would go to host community. Since then questions raised on the actual accounts. However, ISCG and UN hardly gave any concrete response on that. There is a section in the draft JRP 2021 on how much money from which donor is spent / allocated for host community. There is concern on the management cost of INGOs and UN differentiating "luxury" and "necessary". Cost reduction also should be a crosscutting issue to cope with reduce level of aid. For example, all UN agencies could maintain one single logistics unit. In fact, this proposal was mentioned in the Grand Bargain commitments. UN agencies and INGOs could review on maintaining extended offices in Cox's Bazar and consider to return to their existing offices in Dhaka as travelling to Cox's Bazar is very good including frequent flights and comfortable highway transport.
9. **Strengthen govt. refugee management institution with single line authority and single pot fund management, consider counterpart approach.** Now the government refugee management institutions and ISCG are operating as the parallel systems, led by UN expatriates having separate office, management information and planning system. Normally it is considered that the UN has an advantage having technical capacities to control the fund. But the refugee population (1.1 million now, not a regular size of 1 hundred thousand) and its protracted crisis also should be critically considered. Moreover, we are living in an age of dwindling aid and at the

end government of Bangladesh have to take the responsibilities if one day everyone leaves the field. Therefore, it is the most important to strengthen the government's refugee management, i.e., RRRC office. In this purpose, ISCG expatriates need to work as the counterpart of concerned government officials in one office. Present parallel system should be reconsidered.

10. **Awareness and networking on Peace Building and Social Cohesion is an indispensable requirement.** Rohingyas are social human being like others and they have some needs on top of food and shelters. They have a good history of community bondage and peaceful co-existence in Myanmar. We should take deep concern on disturbing news of bad elements which in the long run big threats for them as well as for Bangladesh. So, an intensive awareness, education and networking on Peace Building and Social Cohesion should be initiated at both inter and intra level for refugee and host community. The awareness and education should be tailored to human rights and secularism. More than 60% of population are youth and they should be targeted along with popular cultural and infotainment activities. JRP 2021 has to look upon this. Bangladeshi local NGOs has some good examples on it. This should be considered as a separate sector.
11. **Ban plastic and introduce waste to energy (WTE) and recovery plan for local environment.** Use of plastics in camp is huge and at the end it is creating great damage to the local environment. There are a lot of creative alternatives to plastics. Moreover, authorities should seriously consider to promote waste management which in fact primarily leading to WTE. There should be a block money in this regard, local researchers and NGOs should be invited to do action research and model development especially on quick recovery of local environment.
12. **Sector wise important suggestions** to enhance the efforts:

Sector	Situation and Suggestions	Expected outcome results
Food security	Priority should be given to integrate the increased demand and local production. In the last two years local salt and dry fish producer have suffered low price due to import from outside. Banning plastic could benefit the local potters and waste paper packet producers.	Bulk purchase from local salt and dry fish producers will benefit them. Local pottery and paper basket makers will also be benefited.
Health	Systematic effort is needed to train up Rohingya mothers and adolescent as Paramedics and Barefoot doctors.	Health of Rohingya refugee families will be improved on sustainable basis.
Shelter and Non-Food Items	CCNF raising voice to provide pre-fabricated two-storied shelters in the camps. Govt has approved this. The design should be flexible and removable. "Charkol" from rice husk producing factory / entrepreneurs could be promoted among the host community as alternative to LPG supply.	It will save the spaces and create de-congestion in the camps. Local rice husk will be used to prepare "Charcoal" as alternative to LPG supply, and will create employment opportunity at local level.
Environment and Ecosystem rehabilitation	There is huge use of Bamboo in Camps. We are afraid of possible extinction of the plant in Cox's Bazar and adjacent districts. UN and INGOs should promote planned Bamboo plantation.	Planned promotion of Bamboo plantation will save from possible extinction.
Water, Sanitation and Hygiene	Water Aid planned a study on mapping the underground water. Study report need to be published. A planned effort should be given to enhance surface water preservation especially in UKhiya and Teknaf including rain water harvesting.	Ground water level in UKhiya and Teknaf have to be replenished.

Protection / GBV / Child Protection	<p>NGOs need to develop and publish their Complaint Response Mechanism (CRM) with easy language and accessible for the affected population. High officials of UN, INGOs, L/NNGO should also be accessible to the affected population through horizontal access.</p> <p>NGO / CSO partnership selection should be based on criteria and policy based with transparency and fair competition.</p>	Strengthening PSEA and AAP. Promoting good governance and responsiveness among NGOs through competitions.
Education	<p>Recognition and institutionalization/ certification of Rohingya education is fundamental, especially in Myanmar curriculum.</p> <p>Technical colleges and curriculum should be established in Ukhiya and Teknaf as there is a huge dropout in secondary and higher secondary level.</p> <p>Rehabilitation of school and colleges which are affected due to refugee management.</p>	<p>Certification or institutional recognition. Introduction of technical education in secondary and higher secondary level.</p> <p>Rehabilitation of affected education institutions.</p>
Logistics	<p>All UN agencies should come on a single logistical management as suggested. All INGOs should also proceed for single logistical and transportation unit in cooperation with L/NNGOs.</p> <p>All sub offices of UN and INGOs should not maintain in Cox's Bazar, as the city has good air and non-air transportation facilities with the capital.</p> <p>All field officials of UN, INGO and L/NNGO should reside in UKhiya and Teknaf to reduce traffic (at least 3 hours journey) and cost of journey between Cox's Bazar and Camps</p>	<p>Reducing the cost of so many logistical units among UN agencies and INGOs.</p> <p>Reduce the burden in Cox's Bazar city, reducing the transportation cost and taking position in nearby to the camps especially in Ukhiya and Teknaf.</p>
Coordination and staff health	<p>There will be UN sponsored Medical Treatment Facility (MTF), the MTF should have access to the non UN humanitarian staff too.</p>	<p>Medical facilities for all humanitarian staff.</p>

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1 February 2021

Subject: Letter to Strategic Executive Group (SEG) dated 21st April title **“It is time to think future _ JRP 2021 & Rohingya response should be open to democratic ownership”**.

Dear Mia, George & Johannes

(i) Thank you for your response on the 18th April meeting to my three queries (attached herewith) that I have raised on behalf of local and national NGOs working in Rohingya response. Please note that me and Abu Morshed Chowdury were selected as local and national NGO representatives in an open and participatory process conducted by ISCG. As you have stated that the LTF (Localization Task Force) report is still the issue in the table then I will urge it should be mentioned as one cross cutting strategic objectives in the JRP 2021.

We feel that the LTF report it is futuristic, i.e, not only (a) to cope with reduced levels of aid, (b) also to ensure technology and know-how transfer to local CSOs and also to (c) manage the response with the whole of society approach (WoSA) with the leadership of local actors, while UN and INGOs will play the role in monitoring and technical assistance.

(ii) We have submitted our formal response on draft JRP 2021 on 1st February, anyone can download the 2 page document from here. In view of our impression we have given the title of our comment, "[JRP 2021 : Is it Going Beyond or Business As Usual](#)". But, we feel demoralized that, in the recently circulated draft light version of JRP 2021, there are hardly any reflections, ISCG and all others must consider to give real sense of participation to all stakeholders.

(iii) We have had the same request in our letter dated 15th April. The Localization Task Force (LTF) and its report on the localization road map of the Rohingya response, was a hard work of almost 30 months. It is not only we, in LTF (Localization Task Force) led by UNDP and IFRC with participation of UNHCR, UNRCO, Oxfam, Save the Children, UKAID/FCDO, EU, several prominent independent consultant (e.g., Shireen Huq and Abdul Latif Khan), finally huge field work done by with the leadership of Barrister Manjoor Hasan and his team from CPJ of BRAC University. We request you to publish the report, a huge amount of \$ has spent on the work. Publication of the report was due much earlier, you should understand that any further delay in this regard, will jeopardize our relation of trust.

(iv) May I like to draw attention on the second para of page 8 of the latest draft JRP 2021, "*Additionally, the Bangladesh Rohingya Response NGO Platform is an independent body which brings together more than one hundred Bangladeshi and International NGOs. The NGO Platform Coordinator is fully engaged in decision-making and agenda setting within coordination bodies guiding the Rohingya humanitarian response at all levels*". This sort of statement is top down and again a repetition of ISCG and response management attitude to undermine local homegrown institutions like CCNF (www.cxb-cso-ngo.org), who work not only in rohingya response but also on the whole Coxsbazar issue.

Moreover we have repeatedly reported our concern on democratic deficit of NGO Platform, (a) It is running hardly with democratic due diligence (e.g., there are hardly any NGOP committee meetings in the last 6 months), and (b) the NGOP hardly has been able to develop any relation with local administration. In the last 4 years we have experienced that HoSoG and ISCG use the expatriate led NGOP as a block to deter the direct participation of NGOs especially the participation of Local NGOs. Again we do like to repeat our appeal that all NGOs including local NGOs has the enough capacity to represent HoSoG and ISCG in Coxsbazar level, directly

without any via media. Participation in the sector and the need to keep safe discussion space should not be an excuse in this regard, ISCG and HoSoG expatriates must accept the notion of tolerance and critical engagement.

It is time for building a single silos in Rohingya response, which is only possible with the practice of democratic ownership.

Sincerely