

29th October 2018

Subject : CCNF primary position on Joint Response Planning 2019 : Need Financial Transparency and JRP 2018 Review First, Preparation Methodology Have to be Inclusive.

- (i) **Financial Transparency of Rohingya Aid and Review JRP 2018 should be first.** Since the beginning of influx CCNF urging for publication of Rohingya aid data in view of IATI principles. We have concern on management, operation, expatriate, input and partnership cost as well the cost to the host community. Except NGOs who have to get approval from NGOAB with full transparency and with extra ordinary accountability in the ground level, there are hardly any public information of Rohingya aid from UN agencies. We feel that aid transparency should also be the core responsibility of the ISCG. We urge to have to full transparency of the money which have received already and how it has spent. Along with this we also urge for full review of the JRP 2018 with the involvement of all stakeholders.
- (ii) **The protracted crisis and the nexus of humanitarian and development.** We have prepared the JRP 2018 in a very different situation, there was limited participation of local / national NGOs and also of local communities. But in respect of preparing JRP 2019, there should not be methodological limitations, because as we have to work with the worse scenario and we feel that the Rohingya refugee situation became a long term protracted crisis, and it is affecting all communities and over all development of the Coxsbazar area. Moreover it is not only the humanitarian assistance more it is intrinsically related to overall sustainable development of Coxsbazar district.
- (iii) **Wider space for participation, specially open for it for refugees, local actors and affected communities.** Last time while on behalf of local and national NGOs we have urged for participation in the JRP participation process, there was little scope was available. Moreover I do not believe that the ISCG sector grouping is appropriate channel of participation of local and national NGOs, as local and national NGOs has very little representation in leadership level. Moreover language is a foremost barrier. So, in this regard I will urge especially to consider separate participation space for (i) local and national NGOs, (ii) local government leaders in host community, (iii) local administration or government service agency officials in the refugee camp area and also in district level. Last but not least there should be space for (v) Rohingya refugee and (vi) affected host community. Such a participation should be in at least in sample basis.
- (iv) We have concern on following issues as since the beginning of crisis we have been campaigning on these issues.
 - (a) **Localization agenda** in view of Grand Bargain commitment. In serval of public events and several literatures including with the recommendations from last global localization team visit, there are sufficient recommendations. (e.g., we have proposed UN agencies and INGOs should rollback from field operation, field operation should be with local NGOs, CSOs and local governments, use of Bangla language in all field communication, effective and meaning full coordination to avoid duplication of resources and ensuring quality of services (we feel still there are gap areas) , a commonly agreed recruitment principles and price list so that to minimize staff poaching and contain the continue price escalation in the locality especially where local fixed income people and NGOs who are working for sustainable development of Coxsbazar is suffering).

- (b) **Whole of society approach (WOSA).** We have been repeatedly urging to take the approach, as there are a lot positive factor in this regard, this is also with the spirit of UNHCR's CRRF (Comprehensive Refugee Right Frame Work), i.e., we have to involve local NGOs, CSOs, local government leaders who will take the responsibility of refugees and stand by to their rights. While there is dwindling situation of aid, we strongly feel that this is the best way to minimize the transaction cost and also to facilitate the process to uphold best possible solutions for Rohingya refugees until the repatriation held.
- (c) We are also drawing attention of the UN agencies on their announcement of the **New Way of Working (NWoW).** We refereeing to the Quadrennial Comprehensive Policy Review (QCPR) is the UN General Assembly's way to assess the effectiveness, efficiency, coherence, and impact of UN operational activities for development. As part of QCPR, in December 2016 the General Assembly adopted resolution 71/243, whose "leitmotif" was that the United Nations must change. It must become more coherent, efficient, and capable of addressing the full range of challenges. The UN agencies have to take whole of society approach and also to take triple nexus (humanitarian, development and peace). And they also give attention to inter agency cooperation minimizing inter agency tension, even which have had also envisaged in Grand Bargain commitment.
- (d) **It is hardly ethical that appealing for new money without transparency and continuous strive for reducing transaction cost.** Since the beginning we are placing our request for disclosure of aid money in view of IATI principles. Recently we have demanded the same thing while localization team were in Coxsbazar, ISCG / involved all actors should disclose aid information on (i) management cost, (ii) input cost in field level, (iii) expatriate cost and (iv) local partnership cost. Such a disclosure will make us more socially acceptable and also give general public enabling environment to provide us proposal on how we can progressively reduce transaction cost. I believe that without such a transparency and continuous strive for reducing transaction cost may be appeal for new money is hardly ethical.

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