

3rd February 2022

Subject: **“Anticipate tomorrow and plan today”**. Comments from local and national NGO representative in SEG on Draft Joint Response Plan (JRP) 2022.

- 1. Streamlining of coordination and rationalization of involvement is also to cope with reduce level of aid.** In each year, we get such opportunity. We have had the opportunity to participate in an open multi stakeholder forum on the issue in Coxsbazar, these were a great forum to interact each other, and it is pity that it will not happen this year. But this year, it is special that, simultaneous with drafting JRP, ISCG Senior Coordinator has initiated another one review on streamlining with an external consultant, draft report has submitted, we have given comments on this. Thanks to ISCG senior coordinator, who realize that, to cope with a reduce level of funding, for optimum use of available resources, streamlining of coordination is also a necessary. He also initiated a process of rationalization of involvement in camp.
- 2. RRRC and DC must be brought as leader in ISCG.** In the past, we have had always suggested, single line management, where RRRC will be the authority, ISCG experts will work as counterpart to the government officials of RRRC office. We still believe that, RRRC and DC should be involve as Chair and Co-Chair of ISCG, as they have the authority only to tell, who can involve in response with what. A planning and monitoring unit should be supporting them, especially on need assessment. Draft streamlining report, already suggested Coordination Framework in ground level and also a strong information management system.
- 3. Strengthening involvement of local actors.** We also appreciate that draft streamline report, suggested involvement of local NGOs and to facilitate these, he suggested change in using language. It is not only for sustainability and accountability, but also for advocacy related to best possible approach for ensuring dignity toward Rohingya refugees. For best facilitation of local NGOs at least in Coxsbazar level ISCG should use Bangla language for communication. It was also the proposal from Grand Bargain field demonstration mission (September 2018). We also request to consider the participation of local government representative in ISCG.
- 4. Representation should be selected democratically.** It is the CCNF (www.cxb-cso-ngo.org) leadership since October 2017 demanding local NGO / Local government representation in HoSoG and ISCG, even it was communicated to the then Emergency Relief Coordinator Mark LowCook. Like last year we also see the write up in page 14 of draft JRP, that ISCG senior coordinator chair the HoSoG meeting where “Bangladeshi NGO” is being participated. Last year we have also raised the issue that, we do not know this, our concern is that, who will represent HoSoG and ISCG it should be democratically elected, it should not be on individual wish. We also observed that, ISCG hardly follow the Inter Agency Standing Committee (IASC) definition of local and national NGO, they use a term “ Bangladeshi”, we feel this is not only confuse but we consider it is a sort of pre-text to avoid the participation of local NGO and thus to deprive localization.
- 5. Localization road map should not be made as a dead issue.** If you go through the whole JRP, there was no mentioned of localization task force and its report. Which was led by UNDP and IFRC, participated by Oxfam, Save the Children, UKAID, EU and UNHCR. Centre for Peace and Justice (CPJ) has worked in filed, interacted with various stakeholders, and finally produced a report, suggesting a localization road map for Rohingya response. SEG has published the report, and said that still the report is being consulted, it is in the discussion table. Present ISCG should not make it as a dead issue. Still it is relevant and it is the only report which have suggested whole of society approach.

6. **Three cross cutting issues for protecting environment and to promote local economy.** Several time we have propose these issues, i.e., (i) **banning plastic in camps**, so that there will be fertility of soils will be remained, there are a lot of alternatives are available in this regard and (ii) **purchasing dry fish and salt from local entrepreneurs of the district**. We do not think, these needed big deal in this regard, we hope ISCG will consider these. (iii) We also request to make a plan so that, there will be an effort to **reduce dependence of ground water extractions**, so that after two or three years there will be 0 extractions ground water.
7. **Government contribution should be mentioned and that should be compensated.** All most all nation building agencies of Coxsbazar districts are attached to the response. On top of that, there are RRRC offices and CiCs in each camps, law and order agencies has great presence in the camps, doing challenging jobs. Government has already invested around \$ 400 million on creating shelter in Bashanchar. That should be calculated and that should be mentioned in the JRP. It is logical that, our government should claim it and donor should give those as compensation to our government.
8. **JRP should be a live document especially to accommodate efforts of small NGOs.** There are a lot of small NGOs, in different parts of the country, go for fund raising and communicate with their donors in abroad, round the year. So, we will request to make the JRP as a live documents, should keep sufficient flexibility, so that any time those local NGOs will be able to part of JRP coordination process.
9. **Allow pre-fabricated shelter, reduce the use of bamboo.** Shelter or housing and the congestion is a recipe of all disaster in the camp. Since the beginning, CCFN urging all concern to go for pre-fabricated two story shelter or housing for refugees in the camps. Now it is tarpaulin and polythene is being used for shelter. Dumping of all these polythene and tarpaulin, is creating huge hazard for restoration of fertility of lands. On the other hand, bamboo plant is being used, these Bamboos is being collected from Coxsbazar and Chittagong Hill Tracts region, and we are worried on possible extinction of these plants. So, we are urging our government to allow pre – fabricated simple concrete structure for building two story shelter or housing in the camp, it will ease congestion, reduce dependency on bamboo like natural resources of the locality, and also reduce donor fatigue as they are continuously investing for shelter or housing.
10. **Participation of local NGOs in response management, especially in field operation.** For a low cost operation and to build social cohesion and peace building, we request for participation of local NGOs. As it is the local NGOs has the best capacity to navigate among local power structure. Local NGO leaders can do best advocacy toward policy leaders. We consider, NGO who born in Coxsbazar and NGO leader who born in Coxsbazar, we consider them as Local NGO. We also consider who have born in the district other than Coxsbazar, and now working in Coxsbazar, we consider them as national NGOs. We consider international NGOs who are from across the boarder, they are the international NGOs.

We had a study (January 2020) and found that, majority of the partnership have happened with UN, INGOs and NNGOs, e.g., it is UN and NNGO (16) and UN INGOs (9.4). There are UN and LNGO (3.5), INGO and LNGO (2.8), NNGO and LNGO (0.44). We consider at least one third of the partnership should be with local NGOs, we never deny the involvement other types of NGOs, although our position is, UN agencies and international NGOs should be limited in monitoring, fund raising and technical assistances, field operation should be with priority wise with local NGOs then to national NGOs. Compare to other districts of the country, NGO growth in Coxsbazar is very limited, if you consider the NGO with NGOAB (NGO Affairs Bureau) registration, it is only 7 in numbers.

We also consider that NGOs in Coxsbazar should also be oriented with democracy and human rights, not only mere on service delivery. In view of draft JRP 2022, it should be noted that there are around 52 international NGOs working in Coxsbazar now while it is 74 national / local NGO working in Coxsbazar. We feel it is a best opportunity now, to mingle especially with international NGOs and UN agencies, for learning toward sustainable and accountable organization development.

We do not have study on how much money is going to LNGOs, if we consider the study done by Humanitarian Advisory Group and Nirapod title "When the Rubber Hits the Road" it is around 4 % of funding is going for local and national NGOs. In view of another one study done by ODI, compare to 2016, funding toward national and local NGOs in Bangladesh has been in reduce level.

11. **Transparency on 25 %.** Is 25 % of aid channeling through local and national NGOs. There was a commitment from donors and international agencies, which at least 25 % of their aid money should channel through local and national NGOs. We do like to request donors, UN agencies and INGOs, to be transparent on aid disbursement, whether they are disbursing this in Rohingya response. There is a informal commitment that 25 % of aid should be disbursed for host community, we hope that it will also be transparent in the Rohingya response.
 12. **Front line staff should have insurance and received medical assistance from their employers.** It is the front line staff who have been working in refugee camps, during the difficult time of COVID 19. There are few organizations have responded with assistance while staff have got COVID 19. We request all agencies, to assist staff while they get COVID 19, especially there should be insurance for them.
 13. **Participatory institutions for safety and security.** Safety and security is a major concern among the locals and also among refugees. Anything mishaps will jeopardize development of Coxsbazar district. Our Prime Minister has especial attention in this regard, already around \$ 33 billion has planned for investment in this regard, and there will be around 70 projects. Safty and security with social cohesion could be done with greater awareness, and there should be network of l local government, Rohingya refugee leaders and government representatives.
 14. **Aid transparency for public monitoring so that there will be a continuous try out for cost efficiency.** We had a study on financing in Rohingya response, until December 2020, aid has come per Rohingya family per month \$ 428 and per Rohingya refugee per month is \$ 101. In view of the earlier mentioned report majority of the funding, i.e., more than 70 % funding coming through the UN agencies. We believe that, there should be approach toward cost efficiency (i.e., more effectivity with less investment). We do not know what are the management and logistical cost of different agencies. There are general understanding that management cost of INGOs and UN agencies is high. There is a Grand Bargain commitment that, UN agencies should use one / common logistical unit. We do not deny the involvement of expatriate use, but it should be demand driven, should not be supply driven. There should be planned approach for technology and know- how transfer too.
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