**COMMENTS ON THE UNDP DRAFT COUNTRY PROGRAMME DOCUMENT FOR THE ISLAMIC REPUBLIC OF IRAN (2023-2027)**

*First regular session 2023*

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| **Comments by Canada** | **UNDP Response** |
| * While normally Canada would avoid commenting at this stage of the process of the country program documents (CPDs), in light of the overall deteriorating situation of human rights in Iran, the UN and Member States must ensure that CPD language reflects core UN principles and values and does not undermine a rules-based international system that upholds human rights and democratic governance.
 | UNDP acknowledges the comment. * The CPD derives from the UN Cooperation Framework and the UNCT has systematically integrated a Human Rights Based Approach (HRBA) in the CF analysis and formulation. UNDP remains fully committed to uphold core UN principles and values in a way that does not undermine a rules-based international system and upholds human rights, which are mainstreamed in all our operations and programmes. The CPD stresses direct participation of targeted groups and communities in the design of programmes and projects and other tools such as area-based development, as key mechanisms for implementing rights-based approaches and the inclusion of those in vulnerable situations, to leave no-one behind.
* The CPD will be further detailed through project documents and annual workplans where UNDP will have an opportunity to detail activities that address inclusiveness, equality, vulnerable groups, and gender issues. The latest independent evaluation of an EU funded programmme in Sistan in its preliminary findings (report to be published in mid-December) confirms the application of human rights and gender values and principles, addressing the root causes of conflict and bringing clear value in the most deprived province in Iran.
* Para 4 makes explicit reference to “those in vulnerable situations” and “especially unskilled and semi-skilled workers, the self-employed, transport workers, domestic workers and seasonal workers… often engaged in the informal economy.” Young people facing unemployment and female-headed households, especially those in the lowest three income deciles, as well as micro- and small business-holder have also been mentioned. Moreover, the CPD’s design relies on equitable, inclusive, resilient, and sustainable development principle.
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| * Current developments in the country demonstrate the profound plight of women’s human rights. We expect the UN to work towards advancing gender equality and the empowerment of women and girls, to eliminate poverty, create lasting peace, and achieve sustainable development.
 | We take note of the comment. * UNDP will work closely with all UN agencies on the empowerment of women as referred in the UNSDCF. During the current CPD cycle and in the new CPD, UNDP will continue its focus on vulnerable groups including a specific focus on women. CPD applies integrated and system thinking approaches to achieve transformational changes aspired in the 2030 Agenda. The initiatives such as the Covid-19 response (RASER) and Covid-19 Socio-Economic Recovery (SERP), and the Green-Digital (GATE) initiatives are UNDP’s interventions focused on female headed households.
* In the CPD, female heads of households are explicitly referred to as one of the groups most at risk of poverty and exclusion and in need of support to realize their rights through expanded opportunities for economic participation and voice in local development. UNDP will continue to prioritize women and youth as priority groups in the CPD implementation, across its pillars.
* In 2022, UNDP has put in place a comprehensive Gender Seal Action Plan strengthening programme design and implementation, monitoring and evaluation, reporting, communication, coordination, as well as human resources and procurement.
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| * Canada also urge Agencies to meaningfully further their work with the most vulnerable and excluded groups, including, but is not limited to, ethnic and religious minorities, individuals from LGBTQ2I communities, women with disabilities, and women living in rural and remote communities.
 | We take note of the comment.While not mentioned individually, UNDP has access, works with and targets beneficiaries in all the categories mentioned plus others such as prisons populations and sex workers as sub-recipients under its Health-Global Fund projects.* **Outcome 1: Resilient economy (para 17)** makes reference to the population in vulnerable situations and their access to emerging employment opportunities, focusing particularly in facilitating access of the people of the Islamic Republic of Iran, especially female heads of households and rural women as well as young people to avail of training, skills building, business development support, and digital banking.
* **Outcome 2 (Health)** builds on ongoing work of UNDP since 2005 (as the Principal Recipient of Global Fund for HIV) that focuses on people living with HIV, including people who inject drugs, high risk behavior women affected by HIV; high risk behavior men affected by HIV; transgender people (TGs); people living with HIV (PLHIV); and prisoners. The ongoing work under TB Multi-country Grant, specifically focuses on Afghan refugees and migrants.
* **Outcome 3 (Environment)** builds on ongoing programmes, including the one focusing on the most remote and deprived areas including southeast of the country
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| * We would welcome wider and more transparent consultations with stakeholders and partners in-country, such as women’s rights organizations, in the implementation of the CPD to better adjust to the evolving context, leaving no one behind.
 | We take note of the comment. * UNDP will ensure due consultations as part of the roll out of CPD and throughout the implementation cycle by building on the existing network of NGOs working with UNDP under existing portfolios, specifically health and environment.
* UNDP will continue the practice of close consultation with development partners in the country established during the development of the CPD and will expand such consultation at the stage of CPD implementation as done in the Global Fund CCM and environment consultative processes.
* NGO and CBOs are and will continue to be part of our partnership and implementation strategies as evident in the current CPD and across all its pillars.
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| **Comments by the United Kingdom** | **UNDP Response** |
| * We welcome the efforts of UNDP to develop this CPD for Iran in an evolving and difficult operating context. Recent developments in the country heighten the importance of the UN clearly setting out how it will continue to uphold the UN Charter, especially promoting and encouraging respect for human rights and for fundamental freedoms for all without distinction. We continue to expect that all UN Agencies ensure their work contributes to upholding the Charter, regardless of the country context.

  | UNDP acknowledges the comment. * The UNDP CPD is designed using a Human Rights Based Approach (HRBA) and LNOB lens. The CPD derives from the UN Cooperation Framework and the UNCT has systematically integrated a HRBA in the analysis and in the formulation. UNDP remains fully committed to uphold core UN principles and values in a way that does not undermine a rules-based international system and upholds human rights, which are mainstreamed in all our operations and programmes.
* Independent evaluations and audits provide additional assurances to Member States on UNDP’s accountability and performance.
* The CPD stresses direct participation of targeted groups and communities in the design of programmes and projects and other tools such as area-based development and prioritises the inclusion of those in vulnerable situations to leave no-one behind, especially promoting and encouraging respect for human rights and for fundamental freedoms for all without distinction, in adherence to the UN Charter.
* The CPD will be further detailed through project documents and annual workplans where UNDP will have an opportunity to detail activities that address inclusiveness, equality, vulnerable groups and gender issue. The latest independent evaluation of an EU funded program in Sistan in its preliminary findings (report to be published in mid-December) confirms the application of human rights, gender, addressing the root causes of conflict and bringing clear value in the most deprived province in Iran.
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| * In considering this CPD, we note the efforts of the Government of Iran to deflect scrutiny of its repressive practices. As a result, the balance of analysis in this document is of concern. While derived from the UN Sustainable Cooperation Framework, it disproportionally emphasises external factors as drivers of challenges instead of recognising or acknowledging any domestic shortcomings. It also lacks any focus on addressing the problems arising from specific policies of the Iranian Government including, narrow economic development, regression on gender equality issues, increased attacks on religious and ethnic minorities, surging use of the death penalty, and crack downs on civic space. The UK urges the Agencies to more clearly articulate their contribution to gender equality and the respect and promotion of human rights, including sexual and reproductive rights.
 | * The CPD is based on a recognises external factors outlined in the UNSDCF, which include those emanating from within the country itself, such as the impact of the COVID-19 pandemic on the various social sectors and on the most vulnerable communities, environmental degradation, water, pollution and others.
* As part of the CPD roll out, UNDP is already looking at options to adjust and refine priorities in the start of the new cycle to reflect country priorities.
* UNDP will continue strengthening its analytical base as a crucial element of quality programming. Contractual documents such as project documents are where UNDP drives further into inclusiveness, equality, vulnerable groups and gender and rights-based approach programming, addressing short-, medium- and longer-term challenges.
* In the CPD, female heads of households are explicitly referred to as one of the groups most at risk of poverty and exclusion and in need of support to realize their rights through expanded opportunities for economic participation and voice in local development.
* **Outcome 2 (Health)** builds on ongoing work of UNDP since 2005 (as the Principal Recipient of Global Fund for HIV) and TB Multi-country Grant both focused on enhancing access of people living with HIV, including People Who Inject Drugs, High Risk Behavior Women Affected by HIV; High Risk Behavior Men Affected by HIV; Transgender People (TGs); People Living with HIV (PLHIV); Prisoners, Afghan refugees and migrants to health services.
* UNDP does work and advocates on gender issues. This ranges from the main thrust of the Covid-19 response and recovery offers, which are focused on female heads of households linking two vice-presidencies (Women and Family Affairs, and Environment) with two additional sectoral Ministries (Agriculture Jihad, and Labor and Social Welfare, Rapid Social-Economic Response, and a Covid-19 Socio-Economic Recovery Programme  Initiatives), to our Health portfolio that focuses on people living with HIV, including people who inject drugs, high risk behavior women affected by HIV; high risk behavior men affected by HIV; transgender people (TGs); people living with HIV (PLHIV); and prisoners,
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| **Comments by the United States of America** | **UNDP Response** |
| * We note the CPD’s lack of scrutiny of repressive practices by the Iranian government and a lack of acknowledgement of the need to address problems resulting from the government policies, including those related to gender equality, economic development, religious and ethnic minorities, and crack downs on civic space. We believe there is a strong need to clearly articulate and address the consequences of these policies on the Iranian people’s economic development, wellbeing, and human rights.
 | We acknowledge the comment. * UNDP remains fully committed to uphold core UN principles and values in a way that does not undermine a rules-based international system and upholds human rights, which are mainstreamed in all our operations and programmes. While we do recognize a challenging environment, we do believe that the CPD provides a framework to address human development issues and UNDP’s programming instruments are the tools to further address specific development situations. As part of the CPD roll out, UNDP is already considering tools and approaches to refine the priorities in the start of the new cycle to address emerging country priorities.
* While the terminology and wording has been balanced in the drafting of both the UNSDCF and the CPD, the latter deriving from the former, UNDP has insisted on the principles being applied at the advocacy and programming levels, with an in-depth and HRBA informed review of development challenges integrated in the independent analysis that has grounded the design of both the CF and CPD.
* The CPD is designed using a Human Rights Based Approach and LNOB lens. UNDP remains committed to UN principles and values which are mainstreamed in all our operations and programmes, while independent evaluations and audits provide additional assurances of UNDP’s accountability and performance. While there are no explicit references to human rights, in the CPD, the document identifies and stresses participatory approaches and area-based development as key mechanisms for implementing rights-based approaches and prioritizes the inclusion of those in vulnerable situations to leave no-one behind.
* The CPD will be further detailed through project documents and annual workplans where UNDP will have an opportunity to detail activities that address inclusiveness, equality, vulnerable groups and gender issue. The latest independent evaluation of a EU funded program in Sistan in its preliminary findings (report to be published in mid-December) confirms the application of human rights, gender, addressing the root causes of conflict and bringing clear value in the most deprived province in Iran.
* UNDP does have access to NGOs and does have downstream interventions in the socio-economic areas, environment, and the health sectors.
* The CPD programming instruments stress participatory approaches and area-based development as key mechanisms for implementing rights-based approaches, especially promoting and encouraging respect for human rights and for fundamental freedoms for all without distinction, in adherence to the UN Charter. While not directly addressed in the CPD, supporting effective policy making is embedded in our work.
* UNDP is able to promote the Human Development approach, launching and discussing in Iran every year the yearly Global Human Development Reports (HDR) and Multidimensional Poverty Index (MPI) including country indicators and progress. The MPI is adopted as a national policy in Iran, UNDP has examples of promoting and adopting evidence-based planning such as for needs assessments (Post Disaster Needs Assessment conducted in response to 2019 floods was mainstreamed in 2019-2020).
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