**Tabulated Response to Comments on the Draft CPD South Sudan (July 2016-December 2017)**

**5 April 2016**

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| **Germany Comments** | **Status** | **CO Remarks** |
| Germany congratulates UNDP to this new Country Programme Document for the Republic of South Sudan. Germany is fully aware of the difficult political and economic environment in which UNDP operates. In particular, we thank UNDP Country Director Balazs Horvath and his team for being such a reliable partner and keeping Development Cooperation up in this fragile context of South Sudan. | No need for specific reference in the CPD | Takes note with appreciation |
| The Agenda 2030 provides an improved global reference system for international cooperation. Most of the 17 global goals are highly relevant for South Sudan and progress will be reviewed regularly. Germany recommends to use the Agenda 2030 as another reference document (beside the peace agreement, p. 4) for the CPD. Additionally, to monitor results and major achievement of the Agenda 2030, Germany appreciates UNDPs support to the National Bureau of Statistics (as reliable data does not exist in South Sudan, p.11). However, we encourage to intensify this support and give data availability higher value in the CPD and in national discussions. | Relevant revisions in CPD completed | Agenda 2030 has been added in the third sentence of paragraph 19, page 5.  Furthermore, the 4th sentence under paragraph 19 is amended to clarify that data gaps are not restricted to just the SDGs. |
| Germany appreciates that UNDP together with UNMISS will provide support to the police and correctional services (p. 8). Within the element of institutional support towards the Joint Integrated Police units, special attention should be paid to setting up systems that allow to monitor its performance | No need for further reference in the CPD | Monitoring is an integral of the JIP as with other projects – as per the M&E section, special measures will be taken to allow for monitoring in areas where UNDP is not present.  The police development committee JIP working group has been designated as the oversight structure for the JIP  Independent CSOs will be engaged to monitor performance of the JIP. |
| As many different actors operate in South Sudan, coordination of activities is key. We ask UNDP to participate in relevant coordination fora in South Sudan in order to avoid duplication and inefficiencies. The German portfolio of development cooperation in South Sudan further comprises similar focal areas. Germany would like to request coordination especially of Outcomes No. 1 (resilience) and No. 3 (basic services) with GIZ Country Team in order to avoid duplication and foster synergy effects | No need for specific reference in the CPD | UNDP will participate in relevant coordination mechanisms for effective programme delivery.  UNDP welcomes collaboration with GIZ and will bilaterally follow up. |
| Germany welcomes UNDPs emphasize to target youth and women. However, we also would like to encourage to think about the most vulnerable in terms of handicapped and elderly people, too. Of course we are aware that UNDP operates in an environment in which challenges like migration, starvation, economic collapse, etc. dominate the daily agenda. Nonetheless the most vulnerable cannot be left behind. Hence, Germany would appreciate the integration of few inclusive-aspects into the CPD | Relevant revisions in CPD completed | UNDP supports work with vulnerable population groups, including the handicapped through NGOs funded by the Common Humanitarian Fund.  The last sentence of paragraph 17 has been amended to reflect this. |
| Due to political challenges to work with the South Sudanese Government, the international donor community agreed 2014 on a set of Donor Principles. These principles state, that main donors refrain from direct support of the national government in Juba. Germany for instance redesigned its Governance (Development) Programme towards strengthening humanitarian assistance and providing support for the most vulnerable on the decentralized level. Further, Germany withdraw all technical advisors from Ministries. Germany would like to remind that the Donor Principles should not be forgotten. Direct cooperation with GoSS should be limited in general to a minimum and particularly concentrate on the installation of the TGNU | No need for specific reference in the CPD | Takes note |
| **Norway Comments** | **Status** | **CO Remarks** |
| The updating of the program comes at a critical time in the political process, with the implementation of the peace agreement gaining momentum and the transitional period hopefully about to start. The timeframe for the program, July 2016 to December 2017, will cover the first part of this period and be an important tool for joint approach to dialogue and cooperation with the Transitional Government of National Unity. | No need for specific reference in the CPD | Takes note |
| South Sudan finds itself in the intermediate period between conflict and post-conflict. This creates specific challenges for a country program to have clear priorities, a planned timeline, and adequate flexibility without losing focus. | No need for specific reference in the CPD | Takes note |
| The draft program responds to this challenges in several aspects. However, there is a tendency to outline and expand on planned interventions in a quite large number of sectors without necessarily very clear priorities. The document gives little information on what is considered most important, and the order of priority for the work program. | Relevant revisions in CPD completed | Programme priorities are informed by overarching frameworks, which include the peace agreement signed between the two warring parties, Interim Cooperation Framework of the United Nations and the Sustainable Development Goals (Agenda 2030).  Text on prioritization and context has been added at the end of paragraph 15.  It is important to note that challenges facing South Sudan require an integrated approach whereby one initiative reinforces and leads to the success of the other. |
| The draft program clearly aims to build on and support the implementation of the peace agreement. This is critical in order to secure comprehensive and coordinated programs, and to achieve necessary synergies between development and politics. | No need for specific reference in the CPD | Takes note |
| The two main pillars, building resilient communities, and peace and governance, are relevant and in line with areas UNDP has shown that it is able to produce results also under difficult circumstances | No need for specific reference in the CPD | Takes note |
| The underlying warning about underestimating the challenges and overestimating the will and capacity of the authorities to implement developmental and other programs is important, and even more so now in light of the destruction of what little capacity was there. It would have been interesting if the document went deeper into that discussion to show how this experience has influenced the design of the proposed country program. | Relevant revisions in CPD completed | The programme document acknowledges the low capacity and limited political will. While these are hard to change in the short run (and noting that this is an 18-month programme), UNDP does try to address them. In particular:   * Capacity building is integrated throughout the programme portfolio. UNDP commits to strengthen capacity of state and non-state actors in the country. * Text has been added in paragraph 21 to stress the role of TGoNU’s ownership of national democratic and development processes, which links to its will to implement development and other programmes. * UNDP works not only at the national but also at subnational and community levels. While capacity gaps tend to be larger at lower levels of government, consultations with the local communities facilitate implementation, including through possible capacities from the communities themselves. |
| The background part gives a good introduction to the current crises, and in the chapter on risk management this is discussed more in detail. It would strengthen the document however, if this was spelled out more clearly in the various paragraphs as well. In the discussion on reinvigorating local economy for instance, little is said about the current economic crises and how that may negatively impact the planned programs for micro-credit, small business, trade etc. | Relevant revisions in CPD completed | Text has been added to 1st sentence of paragraph 17 to acknowledge the context; “… taking into account the ongoing macro-economic crisis and challenges”.   * Whilst International Financial Institutions (IFIs) are engaged at the macro-economic level, UNDP in collaboration with national and international actors will focus on restoring and diversifying livelihood and income generating opportunities and entrepreneurship. * In addition, UNDP will strengthen market linkages and value chains to enable targeted communities to realize intended results under the constrained environment (3rd sentence, paragraph 17)   **NOTE:** The word count limit precludes discussing risks associated with the crisis individually for all planned initiatives. |
| An underlying factor for the program is cooperating with local partners, both government and non-governmental. This is critical in order to have an impact in local communities and the various administrative levels, but is also highly challenging in South Sudan. A discussion on experience and results from previous programs and this approach would benefit the document, even more so if lessons learned and necessary adjustments taken could be outlined more clearly. This would be especially important in light of the massive economic and administrative destruction that has resulted from more than two years of conflict. | Relevant revisions in CPD completed | Lesson identified:   * **Civil society organisations** (CSO): assist in extending UNDP’s reach, especially in hard to reach areas. In this respect, UNDP will continue to work with CSOs as implementing partners and grantees, (Paragraph 10). * **Government** - As noted in the response to comment 2 above, capacity building and reinforcing government ownership at all levels is critical, especially given the crisis context. Moving forward, UNDP will support the newly formed TGoNU (as mentioned in paragraph 21). * Text is added in paragraph 15 to acknowledge the effect of the conflict**.** |
| The draft program covers a wide variety of sectors and areas of intervention. Other actors are also involved in areas such as governance, food security and resilience, health etc. This includes both UN-organisations as well as international NGOs. It would be very useful if the document more clearly showed how it intends to identify and deal with interface towards other actors - cooperate where useful, develop a clear UNDP profile where that is required, avoid overlap etc. | Relevant revisions in CPD completed | * UNDP is an active member of the Programme Management Team (PMT) of the UN Country Team (UNCT) where it is outcome leader for 2 of the 5 ICF outcomes. The PMT is tasked with coordinating implementation of the ICF among UN agencies. Paragraphs 23, 31 and 34 all make reference to collaboration among agencies. * UNDP also continues to work with, and strengthen information sharing fora available in the country. These include the humanitarian cluster system and various working groups with government participation. * As mentioned in Paragraph 13, UNDP will focus on its areas of comparative advantage and text on avoiding overlaps has been added |
| Gender aspect and human rights are mentioned as cross-cutting issues in the document. It will be important however, to identify clearly how this will be followed up when the country program is to be implemented on the ground. Both the situation for women as well as human right is critical in South Sudan. The document should be clearer on how it intends to work with these to themes in South Sudan, in a situation with horrendous and systematic attack on women in many areas, and a democratic space that is getting more and more narrow. General terms about strengthening civil society and building capacity in media would probably need to be developed more in order to be relevant in the current situation. | No need for specific reference in the CPD | * UNDP will have specific activities addressing special and differential needs of men, women and youth. These include the Emergency Call Center, Special Protection Units in police for victims of gender-based violence, as mentioned at the end of paragraph 23, as well as Community Policing, and the provision of Pro-bono Legal Aid. * These activities are also supported by gender specific indicators * UNDP will continue to adhere to standard programming principles in conflict settings, including conflict sensitivity and human rights due diligence analyses (paragraph 26). * UNDP will continue to provide grants to civil society and media to link the peace and governance agenda with communities. |
| **United Kingdom Comments** | **Status** | **CO Remarks** |
| We endorse UNDP’s approach to focus on two pillars (more resilient communities and reinvigorated economies/peace and governance strengthened) as part of efforts to carve out its specific niche/focus areas. However, the CPD should: a) clearly articulate linkages between the two pillars and b) better prioritize the planned outputs/activities underneath them to ensure that UNDP is not spread too thinly and does not unnecessarily widen its scope of work. UNDP should continue to consistently sharpen its focus areas, maximise synergies/partnerships (especially under its building resilience pillar). | Relevant revisions in CPD completed | As rightfully highlighted by the UK, Pillar I and Pillar II are inter-linked, complementary and synergistic, with progress on one being dependent on that in the other. Text has been added in paragraph 15 to elaborate on the interlinkages.  Programme priorities are informed by overarching frameworks, which include the peace agreement signed between the two warring parties, Interim Cooperation Framework of the United Nations, and the Sustainable Development Goals (Agenda 2030). Prioritisation of outputs/activities will be articulated in specific project documents and annual workplans. |
| We welcome UNDP’s efforts to align the strategy to the transitional government of national unity (TGNU) period. However, we underscore the need to: a) manage the level of ambition given the challenging context here in South Sudan, building on lessons learnt and the need to be realistic about prospects for reform; b) focus on laying the groundwork for more fundamental reforms beyond the transitional period; c) tailor the approach and activities to flex in any given scenario (e.g. where there is a functioning TGNU/not). | Relevant revisions in CPD completed | Regarding the level of ambition, UNDP agrees with the need to temper it using 2 lenses: realism about prospects for reform (please also see response to a similar issue raised by Norway) and the prioritization imposed (please see response to the previous comment above).  The focus on laying the groundwork for fundamental reforms is echoed in paragraph 15.  Text has been added in paragraph 13 to better reflect the programme’s flexibility |
| We note efforts to strengthen programme management capabilities and to reduce the risk of fraud including by beefing up internal capacity for audits, spot-checks, evaluations and rolling out third party monitoring arrangements and strengthening stakeholder participation. However, the CPD could set out better how these arrangements (e.g. third party monitoring) will be implemented including the anticipated model and a more frank articulation of risks and attendant management strategies. Overall, the CPD is still quite weak on what UNDP’s approach to tackling fraud is and how it will enhance its programme management capabilities to deliver in this particular area. | Relevant revisions in CPD completed | Text added on paragraph 33 to elaborate on third-party monitoring.  Risks: Beyond the risks set out in this CPS (stemming from an integrated UN analysis), UNDP’s detailed risk mapping and risk management strategy is articulated in project documents in line with UNDP’s Enterprise Risk Management System (ERMS). Specific macro-risks have been articulated in paragraphs 25-28.  Fraud: We have added text in paragraph 25 to reflect the CO’s approach to potential fraud and corruption in the South Sudan programme. |
| The document could be further strengthened across several areas: a) a clearer articulation of UNDP’s brokering/coordinating/catalytic role (versus just as an implementer); b) how it will support the 2030 agenda at country level and c) through its two pillars, how it would support efforts to address South Sudan’s immediate needs e.g. the current economic crisis and setting out innovative approaches to deepening accountability and fighting anti-corruption. | Relevant revisions in CPD completed | Test is added text **in paragraph 13** to highlight UNDP’s convening role.  **Support to Agenda 2030**: This is addressed under the Programme Priorities and Partnerships section and paragraph 35 - supporting the generation of data on SDGs by the National Bureau of Statistics.  **Support to immediate needs:** These are addressed through specific projects under the two pillars. For instance, support to the macroeconomic issues and the current economic crisis is being addressed by several development partners including the IMF and the World Bank. UNDP’s support is targeted at the local level, notably on creating livelihoods and bolstering employability while forging macro-micro policy links—please **see paragraph 17**. |