

Office of the Secretary of the UNICEF Executive Board

Template for delegations commenting on the draft country programme documents

2022 annual session

Draft country programme document commenting period: 22 March to 11 April 2022

Delegations are kindly invited to use this template to share their comments on the draft country programme document being presented to the Executive Board during the forthcoming session.

Delegation name: Belgium

Draft country programme document: Syrian Arab Republic

In accordance with Executive Board decision [2014/1](#), draft country programme documents are considered and approved in one session, on a no-objection basis. All comments received by the Office of the Secretary of the Executive Board before the deadline stated above will be posted on the Executive Board website, and considered by the requesting country, in close consultation with UNICEF.

	Delegation's comments	Response(s)
General Comments	<ul style="list-style-type: none">The CPD doesn't reflect with accuracy the current political situation in Syria. There is no clear mention or reference to the Syrian regime nor its actual role in the conflict. No mention is made of the difficulties that this political regime represents in achieving this program. The CPD fails to acknowledge that Syria's present crisis is directly caused by and continually exacerbated by armed conflict. The need for an inclusive and Syrian-led political process that creates a sustainable solution to the conflict, in line with resolution 2254, remains essential and must be clearly stated in the document.	
General comments	<ul style="list-style-type: none">It appears to Belgium that the risk management approach presented does not cover fully the range of threats. Among them, Belgium is particularly concerned by the	

	<p>deterioration of the economic conditions, access limitation, potential diversion of resources, poor financial management, and in general how hostilities and/or deterioration of security conditions can compromise the programme implementation. Therefore, Belgium would like to have more details about:</p> <p>1/ Accountability with a strong internal control, but also a monitoring and tracking system;</p> <p>2/ Multidimensional risks assessment covering the full spectrum of development, and more specifically human rights issues;</p> <p>3/Analysis of national and regional dynamics, including risks related conflicts and security.</p>	
<p>General comments</p>	<ul style="list-style-type: none"> • Too few details are provided regarding the partnership with local and/or independent actors such as international NGOs or local associations, communities or directly with households. Collaboration with local government bodies are mentioned. Belgium would like to draw UNICEF's attention to the need to remain extremely careful in its relationship with public stakeholders or affiliates to the Syrian regime. UNICEF should provide more guarantees that its independency is preserved and no conflicts of interest might occur. 	

Comments on specific aspects of the draft country programme document	<i>(Delegations providing comments may wish to include details, such as the page number, paragraph number, or page of the annexed results and resources framework.</i>	
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