

UNICEF Office of the Secretary of the Executive Board

Template for delegations commenting on the country programme documents 2021 first regular session

Country programme document posting period: November 17 to December 7, 2020

Delegations are kindly invited to use this template to share their comments on any of the draft country programme documents being presented to the Executive Board during the second regular session.

Delegation name: *United States of America*

Draft country programme document: *China*

In accordance with Executive Board decision 2014/1, 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 will be made public on the Executive Board website, and considered by the respective regional office, in close consultation with the country office and the concerned Government.

	Member state comment	UNICEF revised response These revised responses address questions from several other board members as well
	Sustainable Development Cooperation Framework (Framework): The United States maintains its serious concern regarding the content and development of the Framework through a rushed, opaque process, without consultations with all relevant stakeholders and partners. As with the Framework, we seek assurances that all relevant stakeholders and donors will be fully and transparently consulted during the implementation, monitoring, and evaluation of this CPD.	<ul style="list-style-type: none">• The 2021-2025 UNICEF country programme for China has been designed to contribute to the attainment of the 2030 Agenda for Sustainable Development agreed upon by 193 Member States of the United Nations.• UNICEF is committed to UN Reform and a transparent and consultative United Nations Sustainable Development Cooperation Framework 2021-2025 (UNSDCF) process in programme countries.• The China CPD is in line with the UNSDCF. Relevant stakeholders and donors will be engaged in the finalization of the results matrix of the UNSDCF, the implementation of the UNSDCF through Joint Annual Reviews, and implementation of the CPD through programme reviews and other forums.

	<p>Human Rights: The Framework does not include a discussion of one of China’s most vulnerable populations: religious and ethnic minorities. The United States seeks assurances that UNICEF, in implementing this CPD, upholds its obligation to leaving no one behind and does not inadvertently exacerbate the vulnerabilities of this population. The internal guidance to UN agencies regarding UN development system entity CPD’s alignment with the Framework explicitly notes that one of the guiding principles for the UN development system is a “human-rights based approach.” While we understand that agencies tend to adopt the outcomes of the Framework in their respective CPDs, in the interest of promoting greater UN country team coherence, the United States encourages UNICEF to consider including additional outcomes/work “to capture normative and standard-setting activities not prioritized in the Framework” (pg. 19 of UN Guidance on Framework development). Furthermore, The Guidance Note on Human Rights to Resident Coordinators and UN Country Teams instructs that the “role of the UN on the ground is not simply to support the government of the country where it is operating but to consistently uphold and promote the values and principles enshrined in international law, including international human rights law” (pg 9)” and that “fragmented approaches risk losing the UN’s legitimacy – which is based on upholding international norms, standards, and principles” (pg. 12). As such, for the Framework to include and this CPD to further entrench only China’s preferred stance on human rights - elevating the right to development over all other human rights - goes against the UN’s own guidance. As a reputable global development-focused organization, UNICEF should ensure its work does not neglect acknowledgement of and/or attention to uniquely marginalized populations in China. The United States would like to see the CPD better emphasize the work UNICEF will do to improve Chinese institutions' alignment with international human rights law. More specifically, we seek</p>	<ul style="list-style-type: none"> • Through the UNSDCF 2021-2025: ‘The UN will support the Government’s efforts in promoting the development of women, children and persons with disabilities, ensuring their legitimate rights and interests, preventing and responding to violence and crimes against women and children.’ • The UNICEF China CPD aims first and foremost to uphold and protect the rights of all children in China, including all vulnerable groups that include ethnic and religious minorities. • UNICEF is committed globally and in China to uphold the Convention on the Rights of the Child (CRC). Specifically, in China, we will continue to work to address “the unrealized rights of children including children with disabilities, migrant families, children left behind and all vulnerable groups” (paragraph 20). • UNICEF’s Strategic Plan, 2018–2021 includes respecting, protecting and promoting human rights standards and principles, and fundamental freedoms for all children and this will be reflected in UNICEF China’s programmes. • In our Strategic Plan 2018-2021, UNICEF commits: “to realize the rights of all children, everywhere, and to achieve the vision of the 2030 Agenda for Sustainable Development, a world in which no child is left behind.” This commitment is true for our work in China as well and is embedded within the CPD that “is aimed at supporting the Government to realize the rights of all children in China, including the most disadvantaged” (paragraph 22) and to ensure that “by 2025, the rights of more girls and boys, including the most disadvantaged, will be realized so that they survive, live in a safer and healthier environment and develop to their full potential” (paragraph 23). • UNICEF is committed in China to a human rights-based approach to programming and to upholding international norms and standards. This language has been strengthened in the revised CPD.
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	<p>clarification of UNICEF’s plan to contribute in a fulsome and inclusive way to “respect, protect, and promote human rights standards and principles, and fundamental freedoms” (UNICEF Strategic Plan 2018-2021), including how UNICEF will serve China’s most vulnerable populations.</p>	<ul style="list-style-type: none"> • Discussion of child rights is prominent in the CPD (12 mentions) for all children in China, including all vulnerable groups. Child rights inform our programmatic and advocacy efforts. The overarching focus on rights provides the framework for UNICEF’s support to child development efforts in China. • One example of implementing rights principles in programmes is UNICEF’s extensive Barefoot Social Worker programme aimed to ensure children have access to the welfare and protection services they need, and are protected from abuse, violence and harm across China.
	<p>Global Impact: The Framework repeatedly highlights that the PRC has a global development reach that is entirely unconnected to the UN system. The major emphasis on China’s global development work throughout the Framework, in particular the focus of Outcomes 5 and 6, and the subsequent focus on this work in the CPDs, is unprecedented and inconsistent with the role of the Framework and CPD instruments, which are meant to focus primarily on the domestic development work on which the UN will engage within China. In contrast, UNICEF’s CPD for China for 2016-2020 contained only a handful of references to “South-South Cooperation” and one paragraph, which is consistent with standard practice. Any discussion of external development work should be specific in scope and involve primarily engagement with domestic institutions, as is typical, or with specific other countries. The Framework – and as a result, this CPD - has global implications, including for UN Country Teams in third countries, and yet Member States and major donors were never consulted. UN development system cooperation on such an expansive global agenda through its country-based programs therefore requires serious discussions with donors before it can be included in a CPD for consideration by the Executive Board.</p>	<ul style="list-style-type: none"> • The proposed UNICEF country programme 2021 – 2025 is focussed on programming in China as per the summary budget table and the results and resources framework (Child Health, Education, Child Protection and Social Policy programmes). UNICEF China also works on building capacity of Chinese institutions and government to advance child rights, child development and attainment of the child-centred SDGs. This work is done within China, is aligned with the UNDP and UNFPA CPDs and falls within the Partnerships and Engagement pillar. • Recognizing that China is increasing international development efforts that have the potential to impact children, UNICEF aims to inform that assistance and provide advice within China with Chinese institutions and government so that it is grounded in international norms and standards. We aim to influence and inform the efforts of the Government of China in line with international norms and standards, through capacity building of specific institutions in China such as the China International Development Cooperation Agency (CIDCA), as they invest in other countries. The overarching aim is to support the attainment of the Sustainable Development Goals (SDGs) so as to maximize results for all children, leaving no one behind. • Language on the role of UNICEF, specifically the fact that UNICEF will continue to work with partners to ensure international norms and standards are upheld, has been

		<p>strengthened in the revised CPD, particularly in paragraphs 18, 21(e), 25(c), and 44. We consider international norms and standards to be all encompassing and include the values and rights enshrined in the UN Charter, the Convention on the Rights of the Child, Core Commitments for Children, Children’s Rights and Business Principles and other key international norms and standards.</p>
	<p>South-South cooperation: The United States seeks assurances that UNICEF is not directly or inadvertently, through its South-South Cooperation related activities, promoting or advancing China’s signature foreign policy or economic diplomacy initiatives, including “the Belt and Road Initiative” (BRI). UNICEF has signed several agreements with Chinese government institutions to specifically promote the BRI, such as the National Development and Reform Commission (listed in the Annex as a major partner for Outcome 5). UN support should focus on helping developing countries build the capacity needed to ensure all South-South programs, projects, and investments meet the strongest sustainability standards and criteria. UN South-South cooperation assistance should not be conditioned upon or linked to any Member State’s signature foreign policy or economic diplomacy initiatives, as it implies that the UN and/or the specific agency has endorsed and is advancing that foreign policy rather than playing a neutral facilitating role.</p>	<ul style="list-style-type: none"> • UNICEF would like to reiterate that UNICEF China’s programme focuses on China’s children. • UNICEF China will not implement projects outside of China. Programmes will be operationalised and funds used by the UNICEF office in the given programme country, with the consent of the programme country government. • UNICEF reiterates that the work in this area is aimed to address the development needs of the given programme country. • UNICEF seeks to provide technical assistance to countries in line with the UN Charter, the CRC and UNICEF’s Strategic plan 2018-2021, and not to promote any one country’s foreign policy initiatives, including the Belt and Road Initiative (BRI). • UNICEF China acting as a neutral facilitator to influence and inform China’s investments in other countries towards SDG attainment is consistent with the universality and the interconnectivity (between goals, between countries, and between global, regional and national levels) of the SDGs. It is also consistent with the global mandate of UNICEF to promote child rights, working in more than 190 countries and territories, to reach the most disadvantaged children. • The key role of the UN system in supporting and promoting South-South cooperation is re-affirmed in the Buenos Aires outcome document of the second UN High Level Conference on South-South Cooperation (General Assembly resolution A/RES/73/291). • UNICEF China seeks to work with Chinese institutions and government in China to increase their capacity to align their overseas activities with international norms and standards and ensure child rights are protected (paragraph 21e supporting

		<p>capacity building through “enhanced sharing of best practices in line with international norms and standards”).</p> <ul style="list-style-type: none"> • Examples of this work include influencing the China-based MDBs to incorporate a child rights lens into their project development, advocating for the inclusion of Children’s Rights and Business Principles in toolkits for Chinese businesses investing overseas and working with the China International Development Cooperation Agency to ensure international norms and standards are incorporated in their South-South cooperation.
<p>General comments</p>	<p>Sharing of Best Practices: The Framework repeatedly highlights numerous times that the PRC has a global development reach that is entirely unconnected to the UN system. The Chinese government, as the second largest economy in the world, has repeatedly demonstrated its capacity to hold policy and international cooperation conferences, fora, training sessions, and other such events, both at home and abroad, and the UN necessity to facilitate this work is thus unclear. UNICEF assistance to disseminate PRC “best practices” in a UN facilitated forum could be interpreted as endorsing these practices on the-assumption that Chinese internal and external development efforts align with international best practices, norms, and standards, the UN Charter, and the Sustainable Development Goals. The United States seeks assurances that UNICEF is not using limited resources and expertise to disseminate practices that undermine human rights and the application of international best practices, norms, standards, and the Sustainable Development Goals in other countries. Furthermore, we seek assurances that UNICEF’s funding of or involvement in sharing best practices does not imply UNICEF endorsement for China’s foreign policy initiatives like the BRI or China-led foreign policy exchanges, such as China-Africa Forum for Cooperation.</p>	<ul style="list-style-type: none"> • Globally and in China, UNICEF operates in line with the UN Charter, and one of the aims of the UN Charter is ‘to achieve international cooperation in solving international problems’. The UNICEF Strategic Plan 2018-2021 notes the importance of promoting cooperation, sharing lessons learned and fostering innovation and partnerships through South-South and triangular cooperation. • Assessing and transparently sharing best practices in child development - that are in line with international norms and standards – to China from other countries, and from China, aims to support sustainable development bi-directionally. • UNICEF’s collaboration with the Government of China to increase knowledge exchange for children between China and other countries will be promoted transparently, and, in line with international norms and standards (strengthened language in paragraph 44 of the revised CPD). • Best practices will be from the perspective of child rights, child development and child-centered SDGs which bring value under the UN South-South cooperation framework, consistent with the UN Charter, sustainable development principles and international norms and standards. • UNICEF will continue to focus on sharing best practices with relevant Chinese institutions in China to inform the application of international norms and standards in their development cooperation engagement.

	<p>Proper Citations and Fair, Impartial Analyses: Language directly taken from Chinese policies or statements must consistently be marked as such throughout the document and language that could imply UN support for those policies should be edited to remove that ambiguity. The United States requests that the agencies uphold the fact-based, impartial approach required for these documents and their implementation to be successful. UNICEF’s commitment to the “power of evidence” and to “identifying the most marginalized groups [as] a prerequisite for leaving no child behind” (UNICEF Strategic plan 2018-2021) comes into question as this CPD lacks an acknowledgment, discussion, or commitment to protecting vulnerable ethnic and religious minorities in China and references Chinese government ideology and policies without properly marking them as such.</p>	<ul style="list-style-type: none"> • UNICEF does not endorse language that does not align with UN principles. The language in paragraph 3 - “high-speed”, “high-quality” have been marked appropriately. • The data and evidence in the CPD is based on analysis and elaborated in the section on “programme rationale” using a fact-based and impartial approach. • The CPD is a document agreed between UNICEF and the host government. Discussions on the revised CPD with the Government of China were undertaken together with UNFPA and UNDP with shared direction and included the Ministry of Commerce and Ministry of Foreign Affairs. UN agencies maintained an overall common approach on UN positions on key issues. • UNICEF safeguarded its mandate of protecting and upholding the rights of all children, including vulnerable groups, throughout the CPD revision process. • UNICEF’s country program aims to protect the rights of all children in China, including all vulnerable groups that includes ethnic and religious minorities. Our work includes but is not limited to addressing the needs of migrant children or children who are left-behind, children with disabilities, children and women at risk of violence, and, other marginalized groups. Paragraph 20 was revised to make explicit our mandate to work to protect the rights of all vulnerable groups. Changes were also made in paragraphs 4, 6, and 22. • One example is the work UNICEF recently did with counterparts to translate messages in Yi and Tibetan minority languages to ensure ethnic minority children received COVID-19 prevention information.
<p>Comments on specific aspects of the country programme document</p>	<p>P2: Edit/second line: After “continues to have” strike and replace “the” with “some”</p> <p>Comment: China is the world’s second largest economy and as noted in the Framework “the country has a large and steadily growing role in promoting global development.” Stating that China “continues to</p>	<ul style="list-style-type: none"> • The CPD has been edited to reflect that “China continues to have some needs of a developing country” in paragraph 2. • China ranks eighty-fifth on the global Human Development Index and there is unfinished business in terms of child development in

<p>have the needs of a developing country” is not consistent with the UN’s policy of refraining from “express[ing] a judgement about the stage reached by a particular country or area in the development process” per https://unstats.un.org/unsd/methodology/m49/. Edits help to clarify the UN’s position and improve objectivity and impartiality.</p>	<p>China. This warrants UNICEF’s support to ensure leaving no child behind.</p>
<p>P4: Request for clarification: The United States seeks assurances from UNICEF that its understanding of China's most vulnerable populations includes children of vulnerable ethnic and religious minority populations. As a leading global development-focused organization, UNICEF should ensure its work does not neglect acknowledgement of and/or attention to uniquely marginalized populations in China. As noted in the UNSDCF Guidance, "identifying unjust, avoidable or extreme inequalities in outcomes and opportunities, and patterns of discrimination in law, policies and practice” is required to ensure that no one is left behind. The Cooperation Framework does not include a discussion of religious or ethnic minorities. The U.S. government seeks assurances that UNICEF does not align itself with the omission of this uniquely vulnerable population and that the implementation of this CPD does not directly or inadvertently disregard or exacerbate the vulnerabilities of this population, and requests that UNICEF clarify its stance and policies in this paragraph.</p>	<ul style="list-style-type: none"> • The UNICEF China CPD is committed to upholding and protecting the rights of all children in China, including all vulnerable groups that include ethnic and religious minorities. UNICEF endeavours to ensure that no child is left behind in its programme and that we do not neglect the unmet needs of vulnerable or marginalized groups in China. • In paragraph 4 of the revised CPD it has been specified that UNICEF works for <u>all</u> children (emphasis added) in China.
<p>P6: Edit/last sentence: Suggest UNICEF rephrases this sentence to reflect that “The social safety net of China needs to be more child-sensitive, be staffed with qualified social workers, better address geographic and urban-rural, and support the different needs and cultures of ethnic and religious minorities.” See comments for P37, 38 for further clarification.</p>	<ul style="list-style-type: none"> • Paragraph 6 has been edited to indicate that the social safety net of China needs to support the needs of all children in China, including vulnerable groups. This includes ethnic and religious minorities.
<p>P12 and 13: Request for clarification: The PRC has recently implemented educational regulations requiring certain school subjects be taught in only Mandarin rather than in locally native languages. In Inner Mongolia, this policy has resulted in 8,000-10,000 ethnic</p>	<ul style="list-style-type: none"> • UNICEF will continue to work with China to ensure equitable and inclusive education. As outlined in paragraph 37, this will involve ensuring that more children, especially including the most vulnerable, are adequately prepared to start school and are

	<p>Mongolian residents being placed into police custody after protesting what they characterize as a threat to the survival of the Mongolian language, script, and cultural identity within the PRC. This policy appears to follow, and expand, an ongoing pattern of repression of minority languages seen in Tibet and Xinjiang. As noted in the UNSDCF Guidance, "identifying unjust, avoidable or extreme inequalities in outcomes and opportunities, and patterns of discrimination in law, policies and practice" is required to ensure that no one is left behind. How is UNICEF going to work with China to ensure that its work on education is truly equitable and inclusive?</p>	<p>learning and acquiring skills in an inclusive, healthy and safe environment. The focus will be on improving equity and access to quality education, from early learning opportunities, including pre-primary education, that lay the groundwork for success in school, to secondary education, including secondary vocational education, and the transition beyond. UNICEF will support the generation of data, engage in policy analysis and advocacy, and share international best practices.</p> <ul style="list-style-type: none"> • UNICEF is also committed to advocating for, and promoting, inclusive and culturally sensitive education policies.
	<p>P18: Edit: Strike "and disseminate the best practices in child development of China to other developing countries under the framework of South-South cooperation". Comment: Per our overarching comments on sharing best practices, China has repeatedly demonstrated that it is fully capable of holding numerous policy conferences, fora, training sessions, and more both at home and abroad and does not require the UN's resources or expertise to do so. South-South Cooperation should be bi-directional – how is UNICEF bringing other best practices to China? Unless UNICEF has direct oversight over which practices are disseminated to ensure they do not undermine human rights in other countries, UNICEF should not be helping to facilitate the unilateral dissemination of knowledge as it is simply lending its trusted name to entirely China-led and funded processes.</p>	<ul style="list-style-type: none"> • Paragraph 18 has been edited to emphasize the bi-directional nature of sharing best practices in child development under the framework of South-South cooperation, in line with international norms and standards. As mentioned in responses to general comments, one of the aims of the UN Charter is 'to achieve international cooperation in solving international problems'. The UNICEF Strategic Plan 2018-2021 notes that 'promoting cooperation, sharing lessons learned and fostering innovation and partnerships through South-South and triangular cooperation will also be emphasized'. Therefore, assessing and transparently sharing best practices in child development - that are in line with international norms and standards – to China from other countries, and from China, aims to support sustainable development bi-directionally. • UNICEF would like to be clear that the use of UNICEF's brand is strictly controlled at both global and at country level in line with UNICEF's guidelines.
	<p>P19: Edit/fourth line: Strike "to achieve" and replace with "with the stated aim of achieving". Comment: The edit acknowledges that not all of China's external engagements, including under "South-South Cooperation" and otherwise, have resulted in SDG-consistent outcomes. UNICEF should seek to be accurate and objective in its assessment and</p>	<ul style="list-style-type: none"> • Paragraph 19 has been edited. UNICEF reiterates that is not promoting any one country's foreign policy initiative. At the request of the Government of China and consistent with the CPDs of UNFPA and UNDP, paragraph 19 has been edited to include The Belt and Road Initiative as a factual statement. • Paragraphs 18 and 19 reflect on lessons learned from the current UNICEF country programme cycle (2016-2020). UNICEF is

	<p>removes any implication or interpretation that UNICEF endorses all of China's external development as consistent with the SDGs.</p> <p>P19: Request for clarification: The United States requests clarity from UNICEF about the meaning of lines 4-10 (“Better advocacy... influencers in China”). What does UNICEF mean by “value proposition for South-South cooperation and private sector partnerships in development programmes”? Does UNICEF mean that policy makers and influencers in China must uphold international best practices? If so, we suggest rephrasing to be clear about what steps need to be taken. Similarly, what does UNICEF intend by “more investment is required to forge public and private awareness and engagement in China in cooperation with the Government”?</p>	<p>drawing on this experience to indicate that UNICEF needs to better advocate to the Government of China why UNICEF’s engagement is important and what value we bring to development programmes in terms of ensuring they are child-sensitive and in line with SDG attainment.</p> <ul style="list-style-type: none"> • UNICEF will also continue to advocate with the Government of China the value-add of engaging in South-South cooperation in partnership with UN agencies. We will work to inform and influence the policies and practices of the Government of China in line with international best practices, to enhance investments and results for children. • “More investment is required to forge public and private awareness and engagement in China in cooperation with the Government” refers to the necessity of allocating sufficient time and human resources to inform and advocate with partners to support SDG attainment.
	<p>P20: Edit: Ethnic and religious minorities should be added to the list of vulnerable groups Comment: See overarching comments.</p> <p>P20: Edit/line 6: After “ensuring the relevance of education for life and work”, add “while remaining inclusive and respecting the different needs and wants of different cultural groups within China”.</p> <p>P20: Edit: Strike “and other countries”. Comment: The program rationale should justify UNICEF’s efforts based on the needs of China, not third countries, as the CPD instrument is intended to focus on the program country.</p>	<ul style="list-style-type: none"> • Paragraph 20 has been edited to emphasize that UNICEF aims to address the unrealized rights of all vulnerable groups that include ethnic and religious minorities. • Further edits have been made to indicate that UNICEF will ensure the relevance of inclusive education for life and work for all children. This includes vulnerable groups. • As mentioned in response to general comments the proposed UNICEF country programme 2021-2025 is focused on capacity building and programming in China as per the summary budget table and the results and resources framework. When working with the public and private sector in China, UNICEF aims to influence and inform their contribution to advancing child rights in support of the attainment of the Sustainable Development Goals.
	<p>P21(e): Edit: Strike “innovative financing investment” and “the enhanced sharing of best practices under the framework of South-South cooperation”. Comment: As previously noted, the United States does not support UN agencies facilitating the sharing of information as China is fully capable of doing so. Moreover, CPDs</p>	<ul style="list-style-type: none"> • Paragraph 21(e) has been edited to clarify the aim of our work and emphasize our commitment to work in accordance with international norms and standards. • UNICEF aims to influence and inform the efforts of the Government of China to ensure they are in line with international

	<p>should not be committing the UN to facilitating the external investments of any member state. UNICEF should focus on raising the capacity of the government and major lenders, such as the China Development Bank, to uphold international best practices and standards and not commit to specifically supporting their investments. Please see our overarching comments about South-South cooperation and sharing best practices.</p>	<p>norms and standards. We aim to inform policy and practices of specific institutions such as the China International Development Cooperation Agency (CIDCA), as they invest in other countries towards the attainment of the Sustainable Development Goals (SDGs) so as to maximize results for all children, leaving no one behind.</p> <ul style="list-style-type: none"> • UNICEF also plans to share our global experience, best practices and international standards to selected China-based multilateral development banks, financial institutions and corporations so they have strengthened capacity, knowledge, tools and innovative financing modalities to make more child-friendly and child-protective investments that are sustainable, scalable and in line with international norms and standards.
	<p>P22: Request for clarification: The United States seeks assurances from UNICEF that it acknowledges the rights of all children, including those from ethnic and religious minority groups. See overarching comment.</p>	<ul style="list-style-type: none"> • UNICEF wishes to reiterate that the UNICEF China CPD aims first and foremost to uphold and protect the rights of all children in China, including all vulnerable groups that include ethnic and religious minorities. • Globally and in China, UNICEF is committed to upholding the Convention on the Rights of the Child (CRC). • Paragraph 22 has been edited to highlight the importance of the realization of the rights of every child. This includes ethnic and religious minorities.
	<p>P25c: Edit: Strike “and share the country’s best practices with other countries”. Comment: See overarching comments.</p> <p>P25e: Edit: Strike “engagement and”. Comment: Per overarching comments, China is fully engaged at the global scale and hosts numerous international events as previously noted. The UN no longer needs to facilitate this engagement.</p>	<ul style="list-style-type: none"> • Paragraph 25(c) has been edited to emphasize that UNICEF aims to share best practices in child development that are in line with international norms and standards. • Paragraph 25(e) has been edited to avoid ambiguity, as UNICEF aims to “inform the global engagement and commitments of China towards the attainment of the Sustainable Development Goals, including on environmental and social aspects, and transparency and governance”, not facilitate the engagement.
	<p>P28: Request for clarification: Per our overarching comment on human rights, the United States seeks assurances that UNICEF has considered whether these three elements alone are sufficiently in ensuring its work promotes human rights and serves the needs of the most vulnerable populations in China.</p>	<ul style="list-style-type: none"> • The three elements in paragraph 28 refer to three technical cross-cutting programme elements and this has been clarified in the text. • An overarching focus on child rights provides the framework for UNICEF’s support to child development efforts in China.

	<p>P37 and 38: Request for clarification: Given the well-documented increase in the "provincial education policies" that use education as a tool for "Sinicization" and repression of cultural autonomy and identity throughout the PRC, including the specific use of 'vocational re-education' in Xinjiang, how will UNICEF advocate for educational policies that are truly inclusive, respect and promote cultural heritage, and that do not seek to use "education" as a tool in repressing the human rights of ethnic and religious minorities? In regards to provincial systems, we seek further information on how UNICEF will advocate the need for tools to be available in all languages so that children are able to benefit equally in a system that promotes their cultural heritage, and assessments, governance, and standards will be fully inclusive.</p>	<ul style="list-style-type: none"> • Article 29 of the CRC notes that 'States Parties agree that the education of the child shall be directed to: (c) the development of respect for the child's parents, his or her own cultural identity, language and values, for the national values of the country in which the child is living, the country from which he or she may originate, and for civilizations different from his or her own.' Article 30 of the CRC notes that: 'In those States in which ethnic, religious or linguistic minorities or persons of indigenous origin exist, a child belonging to such a minority or who is indigenous shall not be denied the right, in community with other members of his or her group, to enjoy his or her own culture, to profess and practise his or her own religion, or to use his or her own language.' UNICEF's global education strategy (2019-2030), which is aligned with SDG4, adopts a priority focus on the most marginalized, including children of ethnic and linguistic minorities, and supports the generation and scaling up of evidence-based approaches such as mother-tongue/multi-lingual instruction. • As noted above, globally and in China, UNICEF is committed to advocating for, and promoting, inclusive and culturally sensitive education policies. As stated in these responses, the CPD has been revised to make more explicit that UNICEF will work for all vulnerable groups in China including minorities. For example, UNICEF recently worked with counterparts to translate messages in Yi and Tibetan minority languages to ensure ethnic minority children received COVID-19 prevention information.
	<p>P39 line 9: Request for clarification: The United States seeks clarification by what is meant by including "and outside" in line 9. Why is this relevant to note here, in a section on China's domestic development?</p>	<ul style="list-style-type: none"> • This is well noted, and paragraph 39 has been edited and removed "and outside" to avoid ambiguity.
	<p>P42: Edit/comment: We recommend adding "the repression of cultural autonomy and heritage" to the sentence on positive norms, in relation to the widely documented destruction of cultural property in</p>	<ul style="list-style-type: none"> • UNICEF wishes to reiterate that the UNICEF China CPD aims first and foremost to uphold and protect the rights of all children in China, including all vulnerable groups that include ethnic minorities. In line with UNICEF's Child Safeguarding Policy

	<p>Xinjiang and the ongoing repression of minority languages and cultures by the PRC government.</p>	<p>(2016), the UNICEF China country programme will ensure to protect and safeguard children from harm.</p> <ul style="list-style-type: none"> • Paragraph 42 describes priorities in the Child Protection sector and has been edited to include discrimination.
	<p>P43-48: Comment: As noted in our previous comments, the United States has serious concerns about UNICEF’s commitment to promote China’s economic diplomacy and foreign policy, particularly the BRI, given the standing commitments UNICEF maintains outside this document. We understand that this section reflects the Framework and have provided more focused edits that we urge UNICEF to take on board as well as requests for information.</p> <p>P43: Edit: Strike “Knowledge and best-practice exchange”. Comment: Per overarching comments, China has repeatedly demonstrated that it is fully capable of holding numerous policy conferences, fora, training sessions, and more both at home and abroad and does not require the UN’s resources or expertise to do so. Unless UNICEF has direct oversight on which practices are disseminated to ensure they do not undermine human rights in other countries, UNICEF should not be helping to facilitate the dissemination of knowledge as it is simply lending its trusted name to entirely China-led and funded processes.</p> <p>P44: Edit: Strike entire paragraph; minimum edit is to strike the entire second sentence. Comment: Per our previous set of comments submitted in July and above overarching comments.</p>	<ul style="list-style-type: none"> • UNICEF wishes to reiterate that it seeks to provide technical assistance to countries in line with the UN Charter and UNICEF’s Strategic plan 2018-2021, and not to promote any one country’s foreign policy initiatives, including the Belt and Road Initiative (BRI). • As noted throughout the CPD, under the South-South cooperation framework, UNICEF’s enhanced sharing of best practices in child development will be in line with international norms and standards, and bi-directional, aiming to support sustainable development. The key role of the UN system in supporting and promoting South-South cooperation is re-affirmed in the Buenos Aires outcome document of the second UN High Level Conference on South-South Cooperation (General Assembly resolution A/RES/73/291). • UNICEF would like to reiterate that the use of UNICEF’s brand is strictly controlled at both global and at country level in line with UNICEF’s guidelines. • UNICEF will only promote sharing of best practices when fully in line with our mandate, with international norms and standards, and with the aim to build capacity of Chinese institutions to advance child rights and the SDGs. • UNICEF China will not implement projects outside of China. Programmes will be operationalised by the UNICEF office in the given programme country, with the consent of the programme country government. • Paragraph 44 has been edited to highlight international norms and standards.
	<p>P46: Request for clarification: The United States requests information about how UNICEF will “influence” financial institutions and the private sector. We also ask that UNICEF clarify that it will work with these institutions and private sector within China to build</p>	<ul style="list-style-type: none"> • UNICEF will influence financial institutions and the private sector through promoting best corporate social responsibility practices, and through the promotion of Child Rights Business Principles.

	<p>capacity generally and not seek to implement specific projects or agree to facilitate investment projects.</p>	<ul style="list-style-type: none"> • UNICEF aims to influence and inform the investments of financial institutions and the private sector, and build their capacity, to improve children’s rights. • UNICEF intends to offer Children’s Rights and Business Principles (CRBP) to institutions in China and encourage them to include good practices into their policies for the benefit of children. For example, the CRBP and UNICEF’s Child Rights and Mining Toolkit have now been incorporated in the Tools for Responsible Conduct in Outbound Mining Investments issued by the China Chamber of Commerce of Metals, Minerals and Chemicals Importers and Exporters. • UNICEF also plans to share our global experience, best practices and standards to selected China-based multilateral development banks, financial institutions and corporations so they have strengthened knowledge, tools and innovative financing modalities to make more child-friendly investments that are sustainable, scalable and in line with international norms and standards.
	<p>P48: Request for clarification: The United States seeks clarification about the purpose and means of this paragraph. Is this focused on building the network of ambassadors and influencers within China? How will UNICEF overcome domestic regulations that control information flow? How is this work about changing outcomes for children rather than improving UNICEF’s image and following?</p>	<ul style="list-style-type: none"> • Through advocacy, communication and fund-raising efforts UNICEF will both promote child-rights in China and raise funds for delivery of the outcomes of the CPD. To achieve this UNICEF will utilize a range of internet and social media channels and leverage an expanding network of ambassadors and supporters in China. • UNICEF-supported campaigns and events helped position the importance of children’s rights as a key element of sustainable development in China. Integrated communication and advocacy campaigns helped strengthen public engagement in promoting child rights. • UNICEF will continue to try to increase its voice so that we can reach a larger audience in China with our key messages and principles related to the realization of rights of every child.
	<p>Summary Budget Table: Requests for clarification: The United States seeks more information and transparency about the \$15 million for South-South cooperation noted in the footnote. What projects are</p>	<ul style="list-style-type: none"> • As noted above UNICEF will advocate with the Government of China the value-add of engaging in South-South cooperation in partnership with UN agencies, including the funding of the UN.

	<p>included in this \$15 million? Are other UNICEF country offices implicated in this funding pool? If so, which offices? Why were the regular resources increased by more than a million dollars in this draft of the CPD over the draft CPD issued following the previous comment period?</p>	<p>This engagement requires both human and financial resources for UNICEF in China and this has been estimated at \$15 million for the period 2021-2025 (\$3 million/year).</p> <ul style="list-style-type: none"> • The proposed budget is \$3 million/year to cover the costs of staff and their activities in China. This includes advocating for international norms and standards, transparency, and strong governance. This is not funding for outside China – it is operating costs for UNICEF China. • The overall regular resources decreased by more than a million dollars in this draft of the CPD compared to previous drafts. This reflects that the country programme cycle will now be a 58-month period and not a 60-month period, and some further adjustments that were made to account for salary costs for the projected period.
	<p>Annex:</p> <p>Per our overarching comments, we strongly oppose the focus on the “right to development” in Outcome 1 and no mention of “ethnic and religious minorities” in Outcome 2 when the Framework lacks any other discussion of human rights.</p> <p>The United States notes its strong objection to Outcomes 5 and 6 and requests UNICEF’s assurances that it will encourage full, transparent, and timely consultations on other UNSDCF’s to mitigate risks that similarly objectionable content is included in future frameworks. We seek assurances that UNICEF will not promote the Belt and Road Initiative in any work done under the CPD.</p> <p>We encourage UNICEF to focus its resources on improving the China-based institutions listed domestically and avoid actions that imply public endorsement for China’s external development platform or use resources to host events that China fully has the capacity to undertake itself.</p>	<ul style="list-style-type: none"> • UNICEF mandate is to safeguard child rights in accordance with the Convention on the Rights of the Child. The analysis in the Programme Rationale covers the status of the realization of these rights in China. • Rights principles inform UNICEF programming, are included in UNICEF speeches and media in China, and in dialogues with Government. • UNICEF is committed to transparent and consultative United Nations Sustainable Development Cooperation Framework processes. In China, relevant stakeholders and donors will be engaged in the finalization of the results matrix of the UNSDCF, the implementation of the UNSDCF through Joint Annual Reviews, and implementation of the CPD through programme reviews and other fora. • UNICEF wishes to reiterate that it seeks to provide technical assistance to countries in line with the UN Charter and UNICEF’s Strategic plan 2018-2021, and not to promote any one country’s foreign policy initiatives, including the Belt and Road Initiative (BRI). • UNICEF also wishes to reiterate that the proposed UNICEF country programme 2021-2025 is focussed on capacity building and programming in China. UNICEF also aims to influence and

		<p>inform the efforts of the Government of China to ensure they are in line with international norms and standards. As stated, we aim to inform policy and practices of specific China-based institutions such as the China International Development Cooperation Agency (CIDCA), so as to maximize results for all children, leaving no one behind.</p>
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