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Section I: Fragility, Conflict, And Violence In The World (page 3-11)

Paragraphs 7 and 8: While forced displacement is mentioned in Paragraph 9, displacement as an indicator of fragility could be mentioned somewhere in these paragraphs as well. Paragraph 16: A missing global factor/trend is increasing social and economic inequalities and lack of trust in public institutions. Even in mature democracies large swaths of people have lost faith in the ability of their governments to solve fundamental problems.

Section II: Framework For WBG Engagement In FCV

A. Guiding Principles (page 12-17)

Paragraph 40: This is a critical paragraph and we urge you to re-word it or perhaps remove it altogether. The idea that the Bank can support programs in fragile states that “avoid interference in the political affairs of a member country” is a pipe dream. It is impossible to avoid political interference anywhere, but especially in fragile states where politics are so fraught and any action, especially on the scale of Bank projects, is bound to have immense political consequences. This paragraph also directly contradicts Paragraph 68, where reference is made to the Bank’s willingness to leverage its convening power. The Bank intervenes. Period. It would be better to go into more detail as to the implications of its interventions and how the Bank plans to limit the potential harm of such interventions. The commitment to do no harm in Paragraph 41 is noted. Paragraph 45: There is a huge amount to unpack here. In the vast majority of fragile contexts the government *is* directly responsible for causing fragility, conflict, and violence. So the wording implying that this is the exception rather than the rule needs to be adjusted. Then there is the question of what “engagement” actually encompasses. The use of “CSOs” as a catch-all phrase here is not helpful. It would be better to be specific. Do you mean engaging with local human rights actors to get a perspective on violations and root causes of conflict? Is this about engaging with independent operational humanitarian and development NGOs, whether international or national, to carry out programs and deliver services in areas that the government cannot reach? Both? Neither? And what are the implications of the Bank’s “development mandate” in this context? More clarity is needed here. Paragraph 47: We appreciate the “people-centric approach” but wonder whether it is compatible with the focus on work with governments. Paragraph 48: The wording here implies that private sector development being connected to elite capture and corruption is a perception of some groups. Given the rampant corruption and crony capitalism so prevalent in fragile states this would be better stated as follows: In fragile states private sector development is often connected to elite capture and corruption and this is a source of legitimate grievances. Paragraph 49: This seems to be a good place to mention a general concern we have about the violent extremism

discourse. Too often the PVE/CVE discourse and approaches take on the rhetoric and methods of counter-terror and counter-insurgency approaches in which groups of people said to be vulnerable to extremist influence are stigmatized. Such approaches are also used by governments to target and discredit civil society organizations. We prefer an approach that uses poverty and vulnerability criteria rather than nebulous and easily manipulated criteria about populations “prone” to adherence to violent extremism. See also Paragraph 62.

B. Pillars of Engagement (page 17-29)

Paragraph 62: See last comment on the Guiding Principles section. Paragraph 68; We strongly endorse this approach and as noted above feel that it contradicts Paragraph 40. Paragraph 69: While this is somewhat outside NRC’s core expertise, those of us with development backgrounds are concerned about the equity implications of privatizing basic service provision. Paragraphs 73-77: This would be a good place to state the the Bank’s engagement will be within the framework of agreed ,global norms: IHL, the global refugee and and migration compacts, the Guiding Principles on Internal Displacement, and international human rights law. Affirming these norms, which are under assault worldwide, including in powerful countries of the global north, would be significant.. Box 4: The Yemen case is contradictory. The Bank seems to be arguing that it is funding to maintain basic service delivery and preserve institutions in sectors not covered by humanitarian actors, but the bulk of the funding per the names of the projects appears to be going to emergency work managed by UNICEF and WHO. Providing humanitarian funding is not a comparative advantage of the World Bank. But if this type of funding will continue in fragile and “hard to reach” contexts, where government presence is minimal, then international operational NGOs with major delivery capacity should be eligible for such funding. Further, at the time of the Bank’s funding, the country was subject to an embargo by one of the parties to the conflict, begging the question of the Bank’s willingness to engage on political matters, such as efforts to end the punitive embargo, which was jeopardizing the humanitarian response. Paragraph 81: We note this paragraph, but feel that it would be more effective to refer comprehensively to global norms earlier in this section as noted above. Paragraph 103: The Kakuma project referred to has been problematic due to the lack of passes for refugee movement and lack of permits for business start-ups. Without these, this and similar programs simply strengthen the power of middlemen. Our Nairobi staff have raised this concern with Bank staff in Kenya. Paragraph 104: More emphasis should be placed on the rights of the displaced. Lack of civil documentation and inability to establish one’s legal identity are major barriers. The principle of voluntary return in safety and dignity should be affirmed here as well. Paragraph 105: Challenge duly noted, but is there anything to be said here about exactly how the challenge can be overcome?

C. Areas of Special Emphasis (page 29-32)

Paragraph 112: Civil documentation and legal status are prerequisites for participating in and benefiting from these programs. Paragraph 114: A small point, but we are wondering if you can note a source for the statement that cash programming alleviating income constraints can reduce the incidence of violence.

Section III: Operationalizing the WBG's Strategy for FCV

A. Policies, Processes, and Practices: Ensuring the WBG is Fit-for-Purpose (page 33-37)

Paragraph 125: Reducing consultant selection time from 18 to seven months is not all that impressive and will not be adequate for situations when fast action is of the essence. This suggests that the Bank still faces huge hurdles in having the flexibility to operate in fragile contexts. Paragraph 136-138: At the risk of stating the obvious, there is no substitute for in-person monitoring. We are concerned about the potential over-reliance on technical tools that contribute to remote management and monitoring.

B. Programming: Maximizing Impact On-The-Ground (page 37-40)

Overall comment: We are not sure where to add this, but we would like to stress the importance of demonstrating early impact. One NRC country director noted that where she is working there is wide knowledge of the scale of Bank support for the government, but citizens and the intended beneficiaries of these programs don't find the impact commensurate with what they know about the scope of Bank programs. Investing in social services and choosing projects likely to demonstrate relatively quick and visible impact are important for the credibility of the Bank's engagement.

C. Partnerships (page 41-43)

Overall we are disappointed to see virtually no mention of the international NGO sector in this section. While far from the ideal situation, the fact is that international NGOs are massive deliverers of life-saving support and essential services in fragile states. Most UN agencies would have virtually no operational capacity without their NGO partners, both international and national. In this context "CSOs" does not work as a convenient shorthand for such a diverse sector. More precision is needed throughout. Paragraph 157: NGOs should be mentioned here. The Bank also needs to acknowledge how complicated it is to partner with the Bank. How is the Bank going to change to make partnerships, which you acknowledge are essential, more possible? Paragraph 158: Another missed opportunity to mention NGOs. This is also a good opportunity to mention the IASC-mandated coordination structures in fragile states, including the Humanitarian Country Teams and the cluster system. Virtually all HCTs now have NGO representation. Paragraph 160: The use of the term "development interventions" here is not clear. As noted in the comment on the Yemen case, and thinking of the example of the Bank funding ICRC in Somalia, it appears that the Bank is also willing to fund humanitarian interventions as well. If so, this should be clearly stated. Box 11: This raises many questions for those of us who have been involved in the dialogue with the FCV unit over time, especially the discussions of the IDA18 refugee sub-window, The mantra from FCV unit staff as it relates to operations and partnerships has been "this is not about funding." And this is a position that many of us support. It is astonishing, therefore, to read that the Bank has provided U\$2 billion to UN agencies in FCV countries from FY17 to FY20. The rationale for funding the UN system at this level, beyond convenience, needs to be clarified. As for review of agreements with third parties, where the term NGO is used for one of the only times in the document, our dialogue with the partnership team within the FCV unit suggests that the Bank is still struggling with how to address the legal and procedural challenges of providing direct funding to NGOs through the

various fragility funding mechanisms. Paragraph 166: Once again the NGO role needs to be recognized . For example, NRC has engaged extensively in a dialogue with the Middle East office of the World Bank on issues related to housing, land, and property, civil documentation, and access to education in Iraq and Syria, where Bank programs are on hold but where analytical thinking about what might be needed when it is possible to work there is already underway.. NRC staff have given briefings in Washington organized by the Syria program and the urban resilience global practice on its experience with HLP issues in urban settings. Colleagues at the International Rescue Committee and Mercy Corps would be able to cite similar examples. Indeed, it is our belief that exchanging experiences and lessons from ,our operational programs, with or without a funding relationship, should be at the core of Bank partnerships with international NGOs, since our collective experience working in fragile contexts, with the exception of ICRC, is unparalleled.

D. Personnel (page 43-46)

No comments here. Obviously huge changes will be required.

E. The Financing Toolkit for FCV Settings (page 46-51)

Paragraph 183: Once again there is reference to development projects but no reference to humanitarian ones. This does not reflect the actual experience to date of funding humanitarian/emergency programs in Yemen and Somalia.

F. Risk Management in FCV Settings (page 52-53)

Part of risk management will need to include awareness of and adherence to various counter-terror measures and sanctions imposed by governments and the United Nations. World Bank support in limiting the impact of such measures on our collective ability to meet the needs of vulnerable people will be greatly appreciated.

Do you have any additional comments or suggestions?

I am using this additional comments section to clarify the nature of this submission and present some overall comments on the strategy. The comments submitted above are consolidated comments on behalf of the Norwegian Refugee Council, an operational humanitarian organization that responds to conflict-induced displacement in 33 countries. We have the following overall comments, some of which have been reflected in the specific comments already presented above: 1) We appreciate the Bank's openness to comments from the wider humanitarian community and note with gratitude that many of the comments that we submitted on the draft concept note from last year are reflected in the draft strategy. 2) We would also like to acknowledge that devising a strategy to respond to fragility is a genuinely complicated and challenging task, not least for a development finance institution such as the World Bank, which has to reconcile its core mission of providing development finance to governments to overcome poverty with efforts in fragile states where oppressive and ineffective governments may be

drivers of the very fragility that the Bank is seeking to address. 3) The Bank has real power and leverage in fragile settings. The strategy overall is less clear than it could be about how the Bank intends to use this power and to what extent funding will be contingent on governments adhering to international norms, including humanitarian principles, human rights and refugee law, and the Guiding Principles on Internal Displacement. In the worst cases, the various fragile state funding windows may become easy money for governments that are creating the problems that the Bank is trying to solve. 4) At times the strategy reads as if it were a product of multiple drafters completed without a unifying editor tasked with reconciling ambiguity and contradictions in the text. For example, the term “humanitarian” is rarely used and it is not always clear whether “development” is meant to encompass humanitarian action or not. The use of “CSO” as a catch-all category for various types of independent non-governmental organizations is quite misleading and doesn’t do justice to our sector. International operational humanitarian NGOs, such as NRC, have little in common with a national grassroots advocacy group focused on human rights and government transparency. There is much attention to partnerships with the United Nations, but these UN agencies almost all partner with international and national NGOs to actually deliver the assistance that they are tasked with providing. The critical program implementation role of NGOs [not CSOs] is vastly underestimated in the document as presently written.
