



Comments on the World Bank *Fragility, Conflict, and Violence 2020-2025 Strategy Concept Note*
Date: 28 May 2019

The Norwegian Refugee Council appreciates the opportunity to comment on the *Fragility, Conflict, and Violence Strategy Concept Note*, which the World Bank has circulated widely in recent weeks. This note summarizes and consolidates views of NRC staff from headquarters, field offices, and representation offices in donor capitals. In addition, NRC staff will be participating in face-to-face consultations organized by the Bank in Oslo, Amman, and Nairobi, and likely other locations as well.

NRC works in hard-to-reach areas and seeks durable solutions for people displaced by conflict in more than 30 countries. As witnesses to the immense suffering and vulnerability caused by fragility and conflict, NRC staff welcome the Bank's proposed emphasis on supporting a development response to them. It will be impossible to achieve the Strategic Development Goals without a sustained focus on fragile states and the causes of conflict and violence.

We organize our comments in three distinct areas: analysis and thematic issues; partnerships and ways of working; and populations of concern.

Analysis and thematic issues

Considering the amount of resources that the Bank is devoting to respond to countries hosting refugees through the IDA 18 sub-window, we were struck by the relative lack of recognition and attention to displacement in the concept note. As mentioned in separate comments by our colleagues from the Internal Displacement Monitoring Center, displacement is not just a symptom or consequence of FCV, but also a driver of further fragility and conflict, particularly in combination with other drivers, such as drought. Both in the Lake Chad Basin and the Horn of Africa people displaced by natural hazards come into conflict with those displaced by violence, further exacerbating national and regional fragility. Displacement should therefore feature more prominently in the thematic section.

The concept note as presently written recognizes but does not truly wrestle with the inherent contradictions and risks involved in working with states that may themselves be responsible for fostering societal division, alienation, and conflict. In fragile contexts state legitimacy is often in question. For example, the note mentions that private sector development will contribute to increased tax revenue, which in turn allows governments to strengthen provision of services to their citizens. But experience tells us that many fragile states lack the capacity to collect tax revenue, provide few if any public services, and engage in rent seeking in key industries like oil or mineral exploration to fund their militaries, which may violate the rights of their citizens. Further, our experience is that even well intentioned governments may act as a barrier to the appropriate joining up of humanitarian and development funding, especially as it relates to investing in prevention as opposed to response.

We recognize that the World Bank is not and cannot be a humanitarian or protection actor. Nonetheless, it is vital in the context of placing priority on work in fragile states that the Bank acknowledges that state institution building can undermine principled humanitarian action and increase vulnerability. DFID, for example, includes language in its strategies on protracted crises and stabilization that commits the agency to ensuring that programs have no unintended negative impact on the impartial provision of humanitarian assistance, while strengthening humanitarian access and respect for international humanitarian law. While the Bank may not be able to make such an explicit commitment, given the risks involved in supporting governments whose actions drive fragility, conflict, and violence, at the very least reference to IHL and humanitarian principles is warranted.

In this context, dialogue with a variety of actors at country level will be important. It is important that any FCV strategy be well integrated with existing coordination structures.

In addition to IHL, and in line with a greater emphasis on displacement as a driver of fragility, the note should make explicit reference to other legal frameworks and compacts that should shape the work in fragile states. In particular, we note the absence of references to the global compacts on refugees and migrants.

Risk management is going to be critical. As the Bank is aware, armed groups, counter-terror measures, and bureaucratic impediments combine to limit access to vulnerable people in fragile and conflict-affected states. Navigating this environment will require close cooperation with humanitarian actors experienced with meeting and overcoming these obstacles.

The concept note understandably places heavy emphasis on service delivery, infrastructure investment, and government capacity building. Nonetheless, we would like to raise the importance of the “software” side of making progress on fragility, especially ensuring that vulnerable people have access to civil documentation to guarantee that they can assert their legal identity and access housing, land, and property. We know from discussions that many of us have held with Bank staff that there is general recognition of the importance of this issue, but it could be featured more prominently in the concept note than it is at present.

Partnerships and ways of working

The World Bank clearly recognizes that no single institution can address the challenges of fragility, conflict, and violence. Multiple partnerships will be essential to make progress.

The concept note, however, lacks depth and nuance as it relates to the non-governmental sector in particular. It uses the term “CSO,” an all-encompassing category including organizations ranging from organizations like NRC with significant capacity to deliver effective programs in multiple conflict-affected areas to national NGOs, which may be able to work at scale in a particular country, to community-based organizations that may serve as first responders to a sudden crisis or spate of violence. For the FCV strategy to be meaningful, it has to more comprehensively describe the non-governmental sector and recognize the role that international NGOs play in meeting the needs of vulnerable people in fragile states. Indeed, UN agencies, with which the Bank is currently partnering, would have vastly reduced operational capacity without their implementing partners, which are primarily international NGOs like NRC. This same capacity can be made available to governments through tri-partite agreements. This is already being done sporadically in some locations, but the potential for scaling up these arrangements

to meet the needs of vulnerable people in hard-to-reach areas is substantial. This needs to be acknowledged specifically in the concept note.

Populations of concern

As already noted above, the concept note should explicitly acknowledge and address the needs of displaced people within the framework of reducing fragility and conflict. Another population of concern that requires greater attention is that of youth. We recommend analyzing issues related to youth with the same depth as that accorded to gender concerns. Working with youth is a particular focus of NRC's programs in conflict-affected states and we note the following based on our experience:

- Youth are up to three times more likely to be unemployed than adults. About one-third of young people are not in employment or in education or training;
- Education programs within a humanitarian education response tend to focus on primary and basic education, neglecting the needs of youth above 14 years old, whose late primary and secondary education may have been completely disrupted, jeopardizing their future prospects;
- Youth tend to be marginalized in humanitarian programs in protracted crisis situations, but often receive appropriate attention in development programs for social and economic reasons; the Bank therefore has an opportunity to bring its own experience with youth programming to FCV contexts;
- We suggest reconsidering the use of the term "mainstreaming;" youth have very specific needs and interventions need to be specifically designed and targeted to this group, with particular focus on education and health services.