

TO WHOM IT MAY CONCERN

Finn Church Aid (FCA, <https://www.kirkonulkomaanapu.fi/en>), the largest development and humanitarian INGO of Finland, wishes to thank the World Bank Group for the already long-standing partnership, and the opportunity to express its views on WBG's Fragility, Conflict and Violence Strategy Concept Note. FCA is ready to allocate necessary resources for the further stages of the consultations, as it considers the process of crucial importance for the WBG, its partners and most importantly, the FCS/FCV countries and their people. In this first phase of the consultations, FCA will focus on some of the questions posed in questionnaire, but as mentioned, is willing to contribute more and in more detail as needed.

1. One objective of this questionnaire is to understand how effective past World Bank Group engagement in fragility, conflict and violence contexts has been. What are your views? Do you have any examples you can share?

The current Concept Note is understandably very short and straight to the point. This is clear from the fact that the concept makes reference to the (groundbreaking) WDR 2011 and after that jumps straight to IDA 18 – basically hopping over many years of action and crucial processes such as the fragility forum as world's leading arena on discussing fragility; or the contribution that the WBG has had in the implementation on the "New Deal" / International Dialogue for Peacebuilding and Statebuilding (IDPS) or the action by IFC for example through its CASA program. In short: there has been much follow-up to the WDR2011 which should be documented in detail in order for a new strategy to be firmly rooted in the past or ongoing work of the organization, and the lessons learned that has been gained. This story is not short, perhaps it could have been even better than it is currently, but nevertheless it is an impressive story without which the full strategy will not match its potential.

That the upcoming strategy builds on the heritage on the WDR 2011 is logical and well justified. However, a potential danger in lifting the V (violence), is that this risks cutting the dialogue (or not building on the past work) with the global dialogue and processes that have been predominantly focusing on fragility and peacebuilding (and not violence). Given that WBG has done much successful work and partnership-building in the (perhaps narrower field) of fragility and peacebuilding; and given that there have been strong partnership efforts through the International Dialogue for Peacebuilding and Statebuilding, INCAF and G7+ and the process leading to SDG16, as well as the "Pathways to Peace", it would be important that the WBG would build on this heritage, even if it would (again with good reasons) revive the "violence" and WDR2011 legacy.

One observation from WBG's past work on FCV settings is that there is more potential in the work within the WBG the find synergies and capitalize on them for an added impact. One possible case is the work of IFC in its CASA program (see: https://ifccasa10.com/wp-content/uploads/2019/02/CASA-10-Event-Key-take-aways_8-Feb-2019.pdf) and how other work-streams of WBG including networks where the WBG is member of could benefit from the lessons learned of IFC and vice-versa. The benefit of the WBG is its huge weight, that its separate arms can (and should) excel in their specific domains – but how to still better build cross-organizational lessons learned, and how could these lead into better strategic decisions?

Country level (FCS) engagement of WBG vis-a-vis civil society actors could be still more active. Given WBG's sometimes light presence in the FCS, this is may be understandable, but clearly a stronger presence in FCS where civil society actors such as Finn Church Aid anyhow are present, would lead into more opportunities for positive interaction and eventually impact.

2. What is your view of the World Bank Group's proposed approach to its future work in fragility, conflict and violence contexts, outlined in the Concept Note? [If possible, please include page references.]

The approach is solid and the ongoing mechanisms for consultations with partners are commendable.

On a generic note, it is not too difficult to make a good strategy and get it adopted at the highest political level, but it is much more difficult to get a country-level buy-in and real traction for the implementation of this plan. As a reference, if one reads the "New Deal" (IDPS) documentation, it is extremely solid and close to perfect on the paper, but in reality the implementation has been weak and impact much too low. WBG's FCV strategy cannot have a similar faith but it needs from inception make efforts to aim for pragmatism and ability to implement (instead of being perfect on the paper). Some level of local adaptability no doubt will be useful, that even if the strategy gives an overall guideline, there is enough room for context specificity. Currently, the concept note may not offer enough ingredients to judge whether this pragmatism and adaptability is built-in or not.

The current concept is not very strong on "leaving no one behind", or aiming at supporting the most vulnerable (most fragile) contexts. This should be a clearer focus – that extreme poverty will be increasingly centred on the most fragile states; that needed investments (private or blended) that are needed for the DG's or WBG's dual goals, are not reaching the most fragile states and therefore WBG should prioritize these worst-off contexts heavily. The fourth strategic area of engagement gives hope that more is to come, but the most vulnerable should include many other groups of people than refugees only.

3. What is your view of the Strategic Areas of Engagement identified on page 7 of the Concept Note? Are there additional areas you think should be considered?

The strategic areas of engagement are good. It is great that the prevention is lifted as first priority.

One suggestion is that the Partnerships (from the 4 P's) would be lifted as one additional strategic area of engagement. The value of partnerships and cooperation is pronounced in the FCV settings as the concept acknowledges but there is room to stress that even more. When WBG and its partners aim for impact, it is clear that "pipelines" from smaller scale efforts by for example INGO's to WBG work can play a much more important role in the future. Unless WBG finds (jointly) a way to support and nurture this pipeline/partnership, much of its "benefits-of-scale" will not materialize. Similarly, the INGO's or private sector actors need to be helped to see the promise of WBG, and raising the bar / impact that is needed if the fragility is to be overcome.

4. What is your view of the 4Ps outlined on page 10-12 of the Concept Note to enhance the effectiveness of the World Bank Group's operations in fragile and conflict-affected settings? Are there any additional areas you think should be considered?

It is good that WBG is looking at enhancing country-presence in the FCV countries. This is key. Synergies with the IMF's intended stronger presence in FCS should be considered.

5. Do you have any views or recommendations as to how the World Bank Group can best position itself as an integral part of the international community's efforts to promote peace, stability, and prosperity in fragile and conflict-affected settings?

a) focus on partnerships. b) focus on FCS country presence c) build on existing processes and lessons learned (see the response in the first question) d) allocate enough resources and ability to take risks to the "financial logic in overcoming fragility" especially through job creation including in the SME-missing middle in the most fragile countries of the world.

6. An objective of this questionnaire is to explore potential new areas of World Bank Group support in fragile and conflict-affected settings. Do you have examples of innovative approaches, policies and programs, whether in the public or private sector?

Similarly as development cooperation in less fragile states has benefited from the breaking the old established silos of partnerships, meaning that increasingly competence is sought by the states regardless of the "status" of the partner (INGO; NGO; IGO, DFI etc.), such development should strengthen more in the most fragile states. WBG should actively promote the space of civil society and the partnership / cooperation opportunities in the fragile states.

IFC's CASA program has been an unique and valuable tool for the FCS countries and for the world to learn. This, or similar programs should continue. There should be still more flexible tools / programs for IFC's/WBG's disposal which would allow them to target a realistic (meaning smaller than usual) size of investments or other tools in the FCS; or act through partners. Currently WBG is not quite flexible enough for FCS needs.

7. How can the World Bank Group be more effective in helping leverage the private sector to address challenges in fragile and conflict-affected settings?

If the IFC would not be existing, it should be invented. IFC has much potential to leverage the private sector in FCS. IFC has great minds and staff in Nairobi and in Washington DC who are experienced in FCS settings and whose opinions should be sought after and trusted.

8. Do you have any suggestions or recommendations for ways to best measure the impact of development projects and programs in situations of fragility, conflict and violence?

Measurement of impact in FCV settings should be done, and it should be done based on the same criteria as in any other context – these countries and people deserve it. Having said this, patience is needed in the FCV settings. One should not expect quick wins. Building of trust and track-record are needed and these should be appreciated. Human rights related criteria should not be hesitated in the FCV settings.

9. Do you have any additional comments or suggestions?

Finn Church Aid would like to reiterate its willingness to participate in the further rounds of commenting the WBG FCV strategy through its HQ in Helsinki Finland; its office in Washington DC and its offices in some of the most fragile countries of the world.

Congratulations for the good work and all the best for the next steps.

Sincerely,

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