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I write to you to follow-up on the Tokyo conference on Afghanistan and to share specific recommendations from a group of agencies with extensive operational experience in that country. We welcome the broad framework agreed in the Tokyo Declaration. However a number of principles and benchmarks within it will need greater detail and more clarity if they are to be effective. From our perspective, priority issues to be resolved are as follows:

Aid Management Policy

We understand that an Afghan 'Aid Management Policy' will be developed between now and December. This policy will be key for determining more specific mechanisms and processes to promote quality control, accountability and monitoring of any funding through the Afghan government and to promote gender-mainstreaming. It is essential that this policy includes **specific guidelines on how quality, accountability and monitoring efforts will extend to the provincial and district level. It should also provide specific guidelines on how operational NGOs involved in aid delivery, Afghan civil society organisations and the intended beneficiary communities themselves will have a voice in monitoring it. For these guidelines to work, there should be consultation with operational NGOs and civil society prior to finalising the document. A careful balance must be struck between a more rigorous aid management mechanism – which we commend – and the importance of ensuring aid is delivered in a meaningful timeframe. Much damage might otherwise be done if humanitarian aid, or health services, for example, were held up in a lengthy certification process. We look forward to the support of donors to ensure this balance is struck.**

National Priority Programmes (NPPs)

At the time of writing, about half of the NPPs have been fully endorsed, and half endorsed with caveats. Approximately 6 NPPs remain at the design stage. Implementation and monitoring of these plans should follow and we suggest that the following be borne in consideration as NPPs enter into their new phases.

1. We caution donors to recognize that the NPPs are a long way off from having implementation plans. Even fully endorsed NPPs, such as Education for All and Health for All Afghans, lack basic implementation models. Key questions that we find ourselves asking include, to what degree will services be delivered directly by the state, or in partnership with civil society? How will each NPP be enriched by the roles that NGOs can play in service delivery, accountability efforts and capacity-building of state institutions at different

levels? What coordination mechanisms between the state and civil society are required for effective implementation and monitoring to ensure accountability? And, perhaps more mundane, but equally critical, questions – how will tenders be issued for work? What criteria will need to be met by bidding organizations to ensure quality? How will the implementation of NPPs be taxed? These are examples of the level of detail required before the NPPs will be ready for implementation. A genuine costing of the NPP, furthermore, can only be conducted on that basis.

- 2. Much aligned to the above point is the need for new consultation processes on the NPPs to be designed, or old ones improved. Current mechanisms are geared almost exclusively towards endorsement and there is little or no actual consultation of NGOs. As we move towards implementation, civil society could offer significant value in 'ground-truthing' these plans, and developing effective indicators for monitoring their success. Given the difficulties of ensuring meaningful engagement of civil society since the inception of NPP development, we see this as an opportune moment to review and revise the consultation process, with the aim of strengthening it considerably in the next phase. We encourage the British government to use its influence in coordination processes with other donors and the Afghan government to initiate such a review. Such a process would help to broaden and enhance the effectiveness of national ownership by ensuring that engagement extends beyond central line ministries to civil society and beneficiary communities on the ground.
- 3. Finally, deliberate steps must be taken in finalising each NPP implementation plans to articulate the specific and practical ways in which gender and women's rights will be addressed. Data should be consistently disaggregated by gender, and specific plans designed to meet the greater challenges of providing effective, equitable services to Afghan women as well as men. As stated at Tokyo, the NPPs, and the MAF, provide a fresh opportunity to hold line ministries and sub-national governance structures to account on their responsibilities towards NAPWA. Given the difficulties of implementing NAPWA to date, taking an incremental approach to its implementation through the NPPs could be a practical way forward. What then might be the key elements in each NPP which will safeguard gains made for women and girls access to services and rights and enable progress? Are there steps that MOWA can take to coordinate within or amongst line ministries which will gradually enable them to support deeper or more challenging changes? The donor community has a critical role to ensure that NPP implementation integrates such an approach and that women's organisations can participate.

Mutual accountability framework (MAF)

The MAF agreed at Tokyo includes potentially important indicators related to gender, governance and management of natural resources, explicitly the extractives sector, and refers to civil society involvement in taking the agenda forward. However, details of how this will happen are unclear. For example, the gender indicator refers to implementation of NAPWA and EVAW, but does not specify which aspects of these frameworks will be monitored or how. Consultation of civil society on the 'what' and the 'how' for each indicator should take place prior to the framework being presented at the Joint Monitoring and Coordination Board meeting in December. Such consultation could be linked to consultations on the NPPs, as described above, as these should in principle establish the operational framework for monitoring and reporting in different sectors of relevance to the MAF indicators.

Humanitarian assistance and protection

The Tokyo declaration makes a welcome acknowledgement of the humanitarian situation in Afghanistan, notably chronic conflict-related population displacement. Further follow-up is required to ensure that Afghan and international policy addresses issues including forced evictions, identity cards and IDP access to services. Clarity is also required on how funding will reach operational humanitarian agencies, including Afghan local NGOs, with access to affected populations on the ground. To facilitate the independence required for humanitarian access in many areas, some of this funding will need to be distinct from development and state-building budgets. At present, the CAP is only 30% funded.

We would welcome opportunities to discuss these ideas in person in London and in Kabul, and look forward to further collaboration in taking forward the commitments agreed at Tokyo.

Yours sincerely,

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