Detailed comments by BRAC on the Zero Draft Outcome Document of the Doha Programme of Action

22. We affirm that the multidimensional nature of the 2030 Agenda and the Sustainable Development Goals requires the involvement of all stakeholders at all levels – local, national, international – with solutions that are context-appropriate, respond to the needs and rights of populations, in particular those furthest behind, and tap into the full diversity of existing knowledge and experience. It is, in fact, encouraging that national and local governments, civil society, academia and other stakeholders have engaged with the Sustainable Development Goals process and are developing innovative approaches and practices. International financial institutions and several central and national development banks have started to better reflect the Goals as a whole in their strategies and policies.

BRAC’s comments on section #22:
BRAC notes that the draft document emphasizes broad-based collaboration, but the aforementioned section falls short of defining how such collaboration would look like in practice. We therefore recommend that the POA needs to identify quantifiable targets for such collaboration in relevant key action areas. This will allow the LDCs to monitor the collaboration in a quantifiable manner. Also, clear direction needs to be given in terms of financing agreements.

32. Limited social protection exacerbates vulnerabilities across all dimensions of human development in LDCs, which constitute a major obstacle to economic and social development. Notwithstanding the commitment by many LDCs and their development partners, lack of capacities and limited resources in LDCs are major constraints to providing adequate social protection.

BRAC’s comments on section #32:
BRAC recommends replacing the term “social protection” with “comprehensive social protection that is inclusive of the poorest and most vulnerable”.

33. Target: Achieve quality social protection coverage for all in the LDCs including through dedicated, predictable, and sustained funding.
   ● Ensure access to safe food and emergency food assistance in all LDCs

BRAC’s comments on section #33:
BRAC recommends adding the term ‘inclusive’ before “social protection”.

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We also recommend adding 2 additional targets:

- Ensure social protection coverage is designed to include those living in extreme poverty and currently excluded from social protection systems.
- Ensure social protection policies and programs are comprehensive and address multidimensional needs.

34. We will reinforce social protection policies and programmes that are risk-informed, gender sensitive and contribute to strengthening the ability of communities and people, particularly the most vulnerable ones, to withstand shocks and crises, expand their productivity, invest in their health and education and protect their aging populations.

BRAC’s comments on section #34:
BRAC recommends rephrasing the section as the following:

“We commit to ensuring social protection policies and programs are inclusive of people living in extreme poverty and designed to respond to the multidimensional needs of those furthest behind to promote comprehensive coverage, human capital, shock resilience, and inclusive and equitable economic growth for those furthest behind.”

36. We commit to increasing the efficiency and effectiveness of the public sector in delivering social protection programmes, including by expanding the digital infrastructure and information and communication technology capabilities of the public administration, by establishing safe data collection practices to support national registry systems, enhancing cash transfers and payment of entitlements, and by increasing transparency and access to information.

BRAC’s comments on section #36:
BRAC recommends adding the term ‘inclusive’ before “social protection”.

76. We encourage appropriate steps to ensure the full, equal and meaningful participation of migrants in the development of local solutions and opportunities, as well as efforts to improve public perceptions of migrants and migration and to address the special situation and vulnerability of migrant women and girls, particularly migrant women employed in the informal economy and in less skilled work, to abuse and exploitation, underlining in this regard the obligation of States to protect, respect and fulfil the human rights of all migrants.
BRAC’s comments on section #76:
State of Employment (vis a vis. destination countries) need to uphold and preserve the rights of the migrant worker as stated in the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families. The entire convention needs to be ratified and articles 25, 27, 28, 29, 30, without any reservation need to be made mandatory for all States of Employment. (Non-signatory States of Employment need to ensure the rights mentioned in articles 25, 27, 28, 29, 30 through bilateral treaties).

215 While LDCs have made some progress with the process to formulate and implement National Adaptation Plans (NAPs) and in implementing the Sendai Framework, they lack the resources and capacity to address critical needs. Adaptation in agriculture, manufacturing, services and livestock is of prime importance for LDCs, and has major implications for food security, livelihoods especially of the most vulnerable segments of society, and employment. Water resources already face multiple pressures and are highly sensitive to climate change impacts such as drying up of sources, disruption in rainfall patterns and increased frequency of both extreme and slow-onset events. The rapid projected growth of urban populations presents challenges for the provision of services such as water and sanitation, which must develop and grow at a faster rate in order to keep pace. Critical infrastructure, such as roads, bridges, buildings, and grid systems, remain highly vulnerable to extreme climatic events.

BRAC’s comments on section #215:
As suggested in a 2019 report by the UN’s Global Commission on Adaptation, BRAC also recommends that ‘local solutions’ need to be considered by the LDCs for climate change adaptation.