

Agency Coordinating Body for Afghan Relief and Development



30 Years of Coordination

ACBAR Annual Report 2018

1st January- 31st December 2018

1. Introduction

The situation in Afghanistan for this reporting period continued to be challenging for all of us in Afghanistan. As the UN Special Representative noted in UNAMA's 2018 report:

"This is the UN's tenth annual report documenting the plight of civilians in the Afghan conflict — more than 32,000 civilians killed and around 60,000 injured in a decade. It is time to put an end to this human misery and tragedy. The best way to halt the killings and maiming of civilians is to stop the fighting. That is why there is all the more need now to use all our efforts to bring about peace. I urge all parties to seize every opportunity to do so." Tadamichi Yamamoto, UN SRSG Afghanistan, February 2019

UNAMA documented 10,993 civilian casualties (3,804 deaths and 7,189 injured) as a result of the armed conflict, representing a five per cent increase in overall civilian casualties and an 11 per cent increase in civilian deaths in comparison to 2017. Violence and increased crime are reflected in the figures from the International NGO Safety Office (INSO) for NGOs - 245 incidents across the country including 24 deaths and 75 wounded as well as robbery and intimidation compared to 148 in 2017 including 17 deaths and 29 wounded. A severe drought during the winter of 2017 affected many parts of the country which has led to the displacement of 223,100 people according to OCHA records and 282,000 people newly fleeing from conflict – over half a million people requiring support from the humanitarian community. Not surprisingly given these indicators and the fragile economy, poverty is also rising, 55% of the population live below the poverty line in 2018 compared to 38% in 2012/2013, (World Bank, Afghanistan Living Conditions Survey, July 2018).

The NGO Conference in March organized by the Ministry of Economy and hosted by the President at the Presidential Palace, on the first day one, was an important event for NGOs to discuss with Government, donors and UN on implementation issues in different sectors. The 2016 NGO report produced by Ministry of Economy had criticized NGOs for not complying with reporting, for focusing too heavily in major cities (according to budget expenditure) and for not providing balanced development to all provinces. ACBAR presented the views of NGOs at the conference (see Annex 1). The President was critical about some of these issues and asked NGOs to be more transparent. At the end of the conference it was agreed that the Ministry of Economy should come up with a road map which included systematic consultations with NGOs in different coordination groups.

As a follow up to the conference, a group of Monitoring and Evaluation (M&E) experts from NGOs were invited to work with Ministry of Economy (MoEc) on the 2017 NGO report – officially released in September 2018. There are improvements in the 2017 report, there is better explanation of underlying factors in each of the 8 sectors, but the report is still based on financial expenditure rather than achievements. The M&E team recommended that MoEc revise the reporting format by the end of 2018 to include some qualitative indicators. ACBAR has also lobbied for the reporting format to be integrated into the Afghanistan SDGs so that NGOs can report directly on A-SDG targets to the Government. At the end of the year these changes are not yet finalized.

There continue to be bureaucratic difficulties with MoUs and project reporting with different line Ministries on national as well as provincial levels. ACBAR secretariat and regional staff have continued to work on these issues with members and lobby the relevant Government departments. Many of the delays caused by government departments are related to a lack of knowledge of the NGO Law, interference of personal agendas and corruption.

The Geneva Conference for Afghanistan took place in November 2018 – 22 members of ACBAR secretariat, Steering Committee and members attended the conference side-events and the civil

society event. The objective of the conference was to present Government progress on commitments made 2 years previously at Brussels. ACBAR scored two advocacy successes at the conference – firstly with the presentation of civil society perspectives on the SDGs in Afghanistan by ACBAR's Chairperson, Ms. Palwasha Hassan, at the side-event on SDGs. The second success was the Triple Nexus side event organized by ACBAR with the support of ICVA the day after the conference to explore linkages between humanitarian, development and peacebuilding activities and more integrated approaches to programmes. The event was well attended with a mixture of Geneva based NGOs and Afghanistan based NGOs. Generally however ACBAR NGO members and civil society representatives at the conference felt that there was little opportunity to engage in more critical discussions with donors and Government on progress in the side-events. Also the civil society briefing paper was not ready in time for the conference so this was a missed opportunity to promote the voice of civil society. Advocacy will need to be better for the next pledging conference planned in 2020.

In 2018 ACBAR's Twinning Program successfully contributed to international commitments on localisation under the Grand Bargain in the humanitarian sector in Afghanistan by increasing the number of national NGOs eligible to receive OCHA's pooled funds and by providing them opportunities to learn practical skills. OCHA's Humanitarian Response Plan for 2019 notes in 2018:

- * "More than double the number of national NGO partners are eligible to receive AHF funding increasing from 22 in 2017 to 46 in 2018, mainly due to a revised due diligence process;
- * "The use of 17 national NGO partners as enumerators in the Whole of Afghanistan Assessment, funded by the United Kingdom's DFID with the support of the Agency Coordinating Body for Afghan Relief and Development (ACBAR)'s twinning programme, thereby building the assessment capacity of local counterparts".

Finally, the year 2018 marks 30 years of ACBAR's existence since its creation in 1988 in Peshawar. To celebrate we have published stories from previous Steering Committee members and staff on our website anniversary page during the year to remind our members how much has been achieved in the last 3 decades. In September ACBAR held a photographic competition and conference to celebrate 30 years at ACKU which is historically intertwined with ACBAR. Other 30 years anniversary meetings were also held in our Kunduz, Mazar and Herat regional offices. We hope that some of the reflections and ideas from the participants in these meetings will contribute to greater collective planning and activities of NGO members in 2019 and beyond and that ACBAR will continue to play a useful role as a coordination platform for many years to come.

2. Information Coordination Activities

2.1 Meetings with Government, UN and Other Stakeholders

ACBAR Meetings, Jan – Sept 2018	No of meetings	Average no of participants	
Afghan Development Forum (ADF)	4	34	
Afghan Humanitarian Forum (AHF)	12	45	
OCHA Humanitarian Finance Unit (HFU)	2	49	
Advocacy Working Group (AWG)	5	14	
Aid Effectiveness working group (AEWG)	3	15	
Human Resource Working Group (HRWG)	3	30	
Directors Meetings	3	40	
Steering Committee Meetings	11	12	
General Assembly	2	113	
Special meetings (presentations, workshops, consultations)	7	24	
NGO coordination meetings in Herat	10	47	
Advisory Board meetings in Herat	9	3	
NGO coordination meetings in Jalalabad, Kunar and Laghman	6	21	
Advisory Board meetings in Jalalabad.	7	3	
NGO coordination meeting in Mazar	14	24	
Advisory Board meetings in Mazar	13	4	
NGO coordination meeting in Kunduz, Takhar and Faizabad.	11	15	
Advisory Board meetings in Kunduz	8	3	

External representation outside Afghanistan:

- March Director to ICVA General Assembly, Geneva,
- May –Director to regional meeting with ADSP (DRC, IRC, NRC, RI), Dubai
- May, June Twinning Manager to Interaction, Washington NGO Fora meeting and Annual Conference
- July Twinning Manager to UNHCR consultations Geneva
- Sept -Wendy Barron, Deputy Chair, to IOM consultations on Triple Nexus, Geneva
- Sept Vijay Raghaven, SC member, to ICVA/SATHI regional meeting Bangkok
- Nov ACBAR staff, SC members and NGO members to Geneva Conference for Afghanistan where Ms. Palwasha Hassan, Chairperson of ACBAR, presented at the side event for SDGs
- Dec Director and Deputy Dir attended ICVA regional meeting, Bangkok

2.1 Meetings with Government and other stakeholders

- Jan Dec ACBAR AHF was held regularly to provide a platform for sharing humanitarian issues between NGOs and UNOCHA.
- Jan meeting with Minister of Refugees and Repatriation to discuss MoU budgeting issues with NGOs and follow up meeting with humanitarian donors
- Jan Launch of Humanitarian Response Plan 2018 at CEO's office ACBAR Chairperson presented on behalf of NGO community
- Feb MEC presentation on Ministry-wide vulnerability to corruption assessment of the Ministry of Education and recommendations for follow-up by NGOs and civil society.
- March Donor Round Table US Embassy organized with PRM and 6 donors and 25 NGO members
- April meeting with HRDB, ANEC and education NGOs to discuss education sectors issues and follow up on MEC education report
- July meeting with Ministry of Economy on updates on the NGO law, SMAF24, NGO reporting mechanism, M&E committee on 2017 report and new report forms.
- Aug meeting with MoLSAMD/DWCI on working conditions and its improvement.
- Aug Peacebuilding round table discussion with NGO members involved in community conflict sensitivity and conflict resolution activities.
- Aug donor meeting to discuss Triple Nexus hosted by DFID and ACBAR.
- Sept meeting with Ministry of Economy to update to agency members on NGO issues.
- Sept High Level Meeting with UN representatives Mark Lawcock (OCHA) and Filippo Grandi (UNHCR) to discuss NGO concerns with UN humanitarian activities.
- Sept ACBAR 30th year anniversary at ACKU with NGO members and students from University.
 The seminar included two panels of NGO representatives to discuss NGO achievements,
 challenges, and future plans for the past 30 years and their potential role in the future. A
 photographic exhibition was also held and 3 prizewinners selected.
- Nov Participation in Focus Group Discussions in provinces, National Civil Society Conference in Kabul and preparation of GCA position paper with Civil Society Working Committee members leading up to the Geneva Ministerial Conference on Afghanistan on 27-28 of November.
- Dec- participation in Asia-Pacific Regional NGO Partnerships week, with launch of the Sphere handbook 2018, a Regional Innovation Forum, a workshop on strengthening Regional Response in Asia-Pacific and the Launch of ICVA's Briefing Paper on Navigating the Standards.
- Dec meetings with Ministries of Justice, Finance and Economy on NGO customs exemption issues.

2.2 Follow up with Government

- Min of Economy NGO conference March 2018 ACBAR presented NGO issues to President, Government, Donors and NGO representatives (see presentation in Annex). The President was openly critical of NGOs and demanded more transparency. As a result of the conference the Min of Economy proposed to develop a road map with two levels of coordination bodies one high level with donors and line Ministries and one technical working group with coordination bodies. ACBAR members have provided inputs to the draft document.
- Ministry of Finance: MTO office continued to push NGOs to pay their 2009-2016 taxes and penalties. Advocacy through the SMAF 24 working group and a request to the President for a tax amnesty did not have any result. A general exemption for 95 % of penalties for the same period was extended by Government to all tax payers from January to end October 2018.

3. Advocacy

The Advocacy Working Group (AWG) is a monthly forum held in ACBAR for NGOs to prepare and review advocacy papers and policy matters. This year the AWG supported the following activities.

3.1 Activities

NGO Press Conferences:

Two press conferences were organized; one on Health in January and one on Education in July. The press conference on Health focused on progress, challenges and recommendations and four of ACBAR's members put forward their perspective on a national level at the Governmental Media and Information Center (GMIC). Segment of this press conference with interviews of the panelists was broadcast on TOLO news and Ariana News.

The press conference on Education focused on the increasing attacks on educational facilities which also are designated as election polls and the violence that affects students, teachers, communities and school buildings. A segment of this press conference was broadcast on TOLO news. A networking reception was also organized for ACBAR members and relevant media outlets in March 2018.

• Position paper on "Putting protection at the heart of the peace process":

Ahead of the Kabul Peace Process meeting (28 February 2018) the message has been disseminated to relevant stakeholders what the key challenges are on protection of civilians, aid workers and humanitarian assistance in Afghanistan and the urgent need for crafting of solutions for these protection issues.

Advocacy training for Twinning project:

Advocacy department prepared an introduction on advocacy and Sustainable Development Goals (SDGs) for 15 national NGOs in the Twinning project.

• Preparation for the Geneva Conference on Afghanistan (GCA):

ACBAR was involved in civil society preparations for the Geneva conference as a member of the Civil Society Working Committee (CSWC) along with 12 other civil society networks and facilitated by British and Irish Agencies in Afghanistan Group (BAAG). The CSWC started to meet regularly from June onwards to organize provincial consultations and selection of national representatives for the conference. ACBAR organized five provincial consultations including provincial elections and end reporting. In addition ACBAR advocacy members split into several working groups in August and September to look at key advocacy issues for Geneva. A final decision was taken to focus on the new way of working under the umbrella of Humanitarian-Development-Peace Nexus (also known as Triple Nexus). This is the chosen advocacy strategy to kick off a national debate to influence donors, the Afghan government and others to create solutions for the imminent challenges and cross-cut across silos to fulfill the needs of the Afghan people.

• Triple Nexus workshops:

Two one-day workshops were held at the end of August on the Triple Nexus with Jeremy Wellard, ICVA Regional Coordinator as the facilitator. The objective was to share knowledge on the new international good governance concepts and start brainstorming on the need for new approaches for cross-cutting humanitarian and development challenges and making structural, sustainable progress.

Position paper and event on "Coordinating Triple Nexus in Afghanistan":

For the GCA, ACBAR formulated a position paper on the possible framework of the Triple Nexus because Afghanistan is stuck in a worsening vicious cycle of conflict and drought which intensifies poverty and feeds inequality. This cycle must be broken and there should be a paradigm shift to meet effectively the actual needs of Afghan people and creating a sustainable future. A discussion on this issue was held with donors, UN agencies, NGOs and scientists on Thursday 29 November 2018 in Geneva with support from ICVA. In total 60 participants and there was a post briefing disseminated of this meeting to all participants. ACBAR's aim was to

start a national inclusive dialogue on the formulation and operationalization of common outcomes in Afghanistan (with NGOs as a driving force).

• Position paper on needs of people with disabilities:

For the GCA, ACBAR members formulated recommendations to the international community and the Afghan government not to forget the needs of people with disabilities, in a conflict-prone country becoming injured with lifetime consequence is unfortunately frequent.

Comprehensive Refugee Response Framework (CRRF) meeting:

UNHCR and ACBAR held a meeting on CRRF on 21 November 2018 with 30 participants of UN agencies and NGOs. Afghanistan is the pilot country for Asia to roll out CRRF. The linkage with Triple Nexus was made in the narrative.

Revised Working Groups Mapping:

The mapping of different working groups led by different NGOs, UN agencies and government was updated and revised for the website in September 2018.

• Newsletters and articles on ACBAR website and social media:

Regular updates are prepared with relevant publications and op-eds to promote the humanitarian and development work of NGOs on ACBAR's website and social media. Members also receive a bi-monthly news digest is also produced with relevant news and publication lists.

3.2 Policy making

• Afghanistan Sustainable Development Goals and Geneva Mutual Accountability Framework commitments:

ACBAR and 6 of its NGO members (ANHDO, ASAARO, CoAR, PIN, SDO and WCC) participated in the Executive Committee and 3 out of 4 technical working groups led by Ministry of Economy and the CEO's office to prepare indicators and targets for the A-SDGs. These goals and targets are being aligned with the Afghanistan National Peace and Development Framework (ANDP) and National Priority Plans (NPP). ACBAR has recommended in the Geneva Mutual Accountability Framework (GMAFs) that NGOs report to the Ministry of Economy on SDGs in their annual reporting.

• Aid Effectiveness Working Group (AEWG):

ACBAR is facilitating the Aid Effectiveness Working Group, created after the 2016 Brussels conference by civil society to follow up on the SMAF commitments by the Afghan government and the international community. A Terms of Reference (ToR) was agreed on and a Monitoring Board established in 2017. During 2018 members of the Monitoring Board made visits to 5 different projects under the Citizen's Charter. The methodology used was observing, reviewing, visiting grain banks, and discussing with communities with a monitoring check list.

3.3 New initiatives

ACBAR's 30 year Anniversary:

To celebrate 30 years of activities ACBAR contacted previous Steering Committee members and staff of ACBAR members to interview them and publish their stories on the website. An anniversary seminar was held at ACKU on 24 September 2018 with NGO members and University students to discuss the past, present and future of NGOs in Afghanistan. ACBAR also held 3 round tables in the provinces and the discussions were shared on the website and with members. #StoryofAfghanistan photo competition was held, inviting the public through Facebook and Twitter, also to NGO members to send in photos of My Afghanistan. Three prizes were given at the seminar by members of the jury.

• Environmental Working Group (EWG):

Following on from ACBAR's environment project with UNEP in 2017, a working group was suggested for members interested in the environment sector in 2018. A Terms of Reference

(ToR) has been formulated and approved by the Steering Committee, however, there was no activity in 2018.

4. Regional Offices

4.1 Jalalabad Regional Office

ACBAR Jalalabad covers four provinces – Nangarhar, Laghman, Kunar and Nuristan. ACBAR has 41 member agencies (14 national and 27 international) in this region. The Advisory Board members for 2018 were WHH, RRAA, AWRC and JVC. The regional manager's activities included arrangement of 6 NGO coordination meetings and attendance at 34 other meetings. The manager also visited 8 government departments and 39 NGO members. Good relations with Economy Directorate, line departments and Government departments are in place. Sector departments have been cooperative certifying NGO reports. Community satisfaction with NGO activities has increased due to good coordination among NGOs. NGO staff awareness and capacity have improved through ACBAR training workshops.

4.2 Mazar-e-Sharif Regional Office

ACBAR Mazar has 40 members with projects in Balkh, Samangan, Saripul, Jawzjan and Faryab provinces (23 International and 17 National). The Advisory Board members for ACBAR Mazar office in 2018 were AWEC, CARE International, HALO Trust and SCI. The regional manager's activities included arrangement of 14 NGO coordination meetings (12 in Mazar & 2 in Samangan), 13 advisory board meetings, 51 Government meetings, 40 visits to Government departments, 101 NGO visits, 10 UN member and 3 donor visits as well as support for 4 training workshops.

4.3 Herat Regional Office

ACBAR Herat has 35 members (19 International and 16 National) covering Herat, Ghor, Badghis, Farah and Nimroz provinces. In 2018 the Advisory Board members elected for ACBAR Herat office were DACAAR, RAADA, ASSRO and VWO. Activities included arranging of 8 NGO coordination meetings, 7 Advisory committee meetings and 95 visits to various offices such as NGOs, government departments and civil society organisations. The manager assisted ACBAR trainers to prepare trainings and introduced two interns for five days, conducted the celebration of 30 years ACBAR Anniversary with members and non-members and conducted a focus group discussion with 30 members of the Civil Society for inputs to the Geneva Conference on Afghanistan.

4.4 Kunduz Regional Office

ACBAR Northeast office covers four provinces (Kunduz, Baghlan, Takhar and Badakhshan) and has 26 members (19 International and 7 National NGOs). ACBAR Kunduz had an active advisory board in 2018 composed of representatives from ACTED, NRC, AKF and SCA. ACBAR Northeast manager conducted 12 NGOs Coordination meeting, 8 Advisory board meeting and two Advocacy meetings and also attended 50 NGO and Government Directorate meetings (including PDC, OCHA-OCT, INSO and sectorial meetings). The manager also visited 60 NGOs and sectorial directorates, established sound relations among NGOs and sectorial directorates, persuaded the Provincial Governor's Office to assist, support and encourage NGOs, facilitated training workshops for NGO staff, linked NGOs with OCHA for IDP meetings and solved problems of NGOs directly at Provincial Development Committee meetings.

5. Capacity Building Department

The department aims to strengthen the institutional and service delivery capacities of ACBAR members and civil society actors throughout Afghanistan with capacity development trainings based on needs of NGOs on provincial levels. During this period ACBAR has conducted 8 trainings on M&E

and Sphere Project in 8 provinces to develop the capacity of NGOs staff in M&E Systems, M&E Plans, Project log frame, Sphere Minimum Standards in Humanitarian Response and Humanitarian Charter (see Annex). The project is funded by the Ministry of Foreign Affairs of Japan through a network of Japanese NGOs under the title of Afghanistan Civil Society Support Initiative (ACSSI).

All trainings are evaluated after one month and the reports are shared with all stakeholders through the ACBAR website.

6. ACBAR Twinning Program

6.1 The Twinning Program started in 2015 to help build the capacity of National NGO (NNGOs) to provide improved humanitarian aid and to strengthen their ability to become an Afghanistan Humanitarian Fund (AHF) partner, previously the Common Humanitarian Fund (CHF. In 2018, the Twinning Program continued to focus on mentoring the NNGOs through policy review, strategic work plans, INGO/NNGO field visits and humanitarian assessments. Additional strengthening of the organizations was done through training, networking and engagement in humanitarian meetings including the ACBAR Humanitarian Forum and cluster meetings. From 2015 through Dec. 2018, 116 days of training were provided to NNGO twinning partners. In October 2018, ACBAR started an OCHA-HFU meeting for twinning and other humanitarian partners to cover the practical aspects of being an AHF partner. In 2018 one NNGO newly joined the Twinning Program, Development and Ability Organization (DAO).

At the end of December 2018, the ACBAR Twinning Program was full with 24 NNGOs and 12 INGOs that were twinned with one to three partners. A total of 20 NNGOs passed AHF Due Diligence (DD) including the graduated partner and the final 5 NNGOs applied for AHF DD in 2018. By the end of the year, the AHF Partner Base included 14 twinning partners that passed the AHF Capacity Assessment (CA) and registered in the Grants Management System (GMS). An additional 2 NNGOs passed the CA and need to register in the new GMS system to be added to the partner base, 4 are waiting for capacity assessments

The DFID Annual Review of the Twinning Program for October 2017 through September 2018 was completed in November 2018. The DFID Annual Review resulted in an A for the Twinning Program.

7. Finance Department

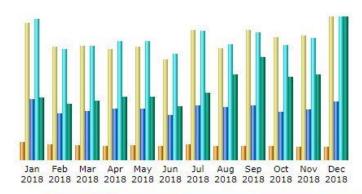
In 2018 the finance department has carried out activities according to plan. Donor reports were prepared and submitted to donors on time and also the monthly financial reports have been prepared and submitted to Steering Committee. We prepared financial report of 1397 and submitted to MoF and also we submitted 1st semi-annual report to Min of Economy. An annual audit has been carried out for DFID funding and the audit report has been approved by DFID. In this period ACBAR had a new donor, the German Government through WHH which started on 15th November 2018. In 2018 ACBAR did not face any financial deficit.

8. Human Resources and Administration Department

ACBAR consisted of 44 staff during 2018. During the year, three interns were recruited, one support staff and one translator. The regional manager for Kunduz applied for the position in Jalalabad and was successful and a new manager was hired for Kunduz. The department provided advice to ACBAR members on labour law issues -visa process, retirement, benefits, compensation leave, and severance payment. ACBAR changed its office in May and moved to a new compound which required installation of security measures. The department was also responsible for preparing logistics and stocks reports and inventories to submit to finance department for audits and further processes. In addition to these activities the department and members of the Senior Management Team revised different organizational policies in an ongoing process.

9. Website Department

During 2018 ACBAR website department has responded to 22,145 inquiries from different stakeholders (Members NGOs, Non-Member NGOs, private sector, Government and Donors) and posted 2,900 RFPs / RFQs and 18,032 job announcements on the ACBAR website. ACBAR received 60,507 USD as income from charges made to subscribers (private sector, non-member NGOs, Donors and UN) for these services. Member NGOs and Government can post jobs/RFQs for free.



Month	Unique visitors	Number of visits	Pages	Hits	Bandwidth
Jan 2018	66,988	503,879	7,976,768	18,477,026	280.66 GB
Feb 2018	57,582	416,776	6,045,561	14,565,597	252.02 GB
Mar 2018	55,347	419,034	6,377,744	14,963,546	267.71 GB
Apr 2018	51,593	408,658	6,677,559	15,519,879	286.04 GB
May 2018	55,318	415,317	6,727,179	15,585,397	282.90 GB
Jun 2018	51,732	370,513	5,872,428	13,885,095	241.37 GB
Jul 2018	56,294	476,636	7,136,830	16,874,925	303.58 GB
Aug 2018	49,771	410,487	6,931,886	15,130,016	385.18 GB
Sep 2018	52,126	476,259	7,079,869	16,697,225	463.49 GB
Oct 2018	51,317	451,154	6,266,407	15,032,525	372.84 GB
Nov 2018	48,278	457,115	6,653,447	15,961,706	384.17 GB
Dec 2018	48,034	525,655	7,669,175	18,728,349	644.01 GB
Total	644,380	5,331,483	81,414,853	191,421,286	4163.98 GI

10. Looking ahead in 2019

In 2019 ACBAR will continue discussions on the Triple Nexus and Afghanistan Sustainable Development Goals with its members, the Government, UN and Donors on how to implement these strategies and commitments. There will also be a review of ACBAR's current 3-year strategic plan to identify priorities for the next 3 years. ACBAR would like to thank its donors for their support in 2018 and for their continued support in 2019.

Annex 1

Ministry of Economy NGO Conference

11 March 2018

Your Excellencies, Mr. President, Distinguished Guests, NGO Colleagues

I would like to thank the Ministry of Economy: the Minister, Deputy Ministers, Director of the NGO department and their colleagues in the Ministry of Economy for preparing this conference and providing us an important space to discuss with Government and Donors on the role of NGOs in the development of the country.

ACBAR was established in Peshawar in 1988 - 30 years ago — to coordinate NGOs working cross border in Afghanistan and with the Afghan refugees. We have seen a continuous commitment and presence in Afghanistan of the NGO sector (national and international) since the early 80s — this commitment is something we can all be proud of. NGOs are the backbone of the development of civil society in Afghanistan in the last 15 years — here as in every country in the world you will find citizens gathering together to create associations and organisations to improve some aspect of their lives and their society.

We are 5 coordination bodies – ACBAR, Afghan Women's Network (AWN), Afghan Civil Society Foundation (ACSFO), Afghan National Coordination Bureau (ANCB) and South Western Afghanistan and Baluchistan Association for Coordination (SWABAC) that worked on the original version of the NGO Law in 2005 and the revision in 2016 which is with Ministry of Justice. We have all signed an NGO code of conduct in 2005 that requires our members must agree to standards of transparency, accountability, non-discrimination in our work, to follow the principles of human rights, humanitarian law and DO no HARM. As coordinating bodies we provide information and ideas to our members; we engage in collective advocacy on different issues with Government, UN, donors, other civil society networks such as the Civil Society Joint Working Group (CSJWG) and the public – and we provide training courses and capacity building for NGO staff across the country. Many Afghan colleagues today in the Government, the UN and Embassies started their professional careers in NGOs.

The 2016 NGO report from the Ministry of Economy (MoEc) is concerned that there is a concentration of NGO activities in different provinces, more in the cities and less in some rural areas, which is contributing to un-balanced development. This is an important issue – we do not want to leave anyone behind in the development of the county – especially the poor, the sick, people with disability, the marginalized, children, women, youth and the elderly. We need to examine underlying factors.

1) One factor is of course Security. It has never been so difficult to access many parts of the country due to ongoing conflict in order to reach our targeted beneficiaries. Traditionally NGOs rely on good relations with local communities to implement activities. However now, many local communities say they cannot guarantee our safety. INSO (the NGO safety office) has recorded 1,844 attacks on NGO staff in the last 7 years – abductions, thefts, damage to offices, deaths. 142 NGO workers have been killed since 2014. This is part of the already too high civilian casualties in Afghanistan. Insecurity makes our work more difficult and more expensive – we have to improve security in our office and compounds, we reduce our movement to minimize risks and protect our staff. This also means that we cannot easily see the quality of our work – it is more difficult to directly monitor our projects ourselves and we have to use other techniques like remote monitoring of beneficiaries, monitoring by local communities and third party monitoring.

- 2) A second factor behind why are there is a concentration of NGO programmes in some provinces is the large demand for humanitarian services. In the last 2 years we have seen refugees from Pakistan and Iran settling in Jalalabad, Herat, Kabul and Kandahar all these cities have seen a growth in population and informal settlements. OCHA reports a million people living in informal settlements in Nangarhar in 2017 and 52% of IDPs move to provincial capitals. This then is where humanitarian programmes and first response need to be carried out and will account for much of the off budget expenditure in education and health and social protection in the MoEc Report.
- 3) A third factor that affects lack of balance in NGO activities is lack of coordination between donors and government. Although Donors have to align their bilateral funding with the National Priority Plans and the Afghanistan National Peace and Development Framework each donor and each country have their own priorities on where they prefer to spend. We see some gaps due to changing priorities. A report on aid effectiveness published this month for Oxfam and Swedish Committee notes that stronger leadership and ownership of their development plans is needed by Government Ministries to influence the donors in each sector and to provide clear measurable results. The report suggests that the Self Reliance through Mutual Accountability Framework (SMAF) provides a platform for accountability between the government and international donors, but is not sufficiently enforced. In the current situation some Ministries receive more support from donors and others much less which leads to an imbalance in programming.

Recommendations: What can the Government do to further improve NGO effectiveness and thereby benefit the communities that we serve?

- 1) An enabling environment is important for all of us. As coordination bodies we have worked hard since the Brussels Conference in a working group with representatives from Ministry of Economy and Ministry of Finance on the SMAF Indicator no. 24, to review tax and reporting issues for NGOs. In December the working group has formally signed a request to the Ministry of Finance and the Cabinet for an amnesty for NGOs for all late taxes and penalties charged to NGOs for the period 1388 -1395 (2009-2016). As NGOs we only have annual budgets from our donors and do not have additional funds to pay penalties from previous years. An amnesty for all NGOs will reduce current delays in clearing tax returns in the Medium Tax Office in Min of Finance and the potential for further corruption. ACBAR also urgently requests that the Ministry of Finance stop putting NGOs on a black list so that they cannot obtain visas or import products or use their bank accounts. All this obstructs our ability to deliver services to those who we support.
- 2) Secondly we request the Ministry of Economy to simplify administrative procedures for NGOs on national and provincial levels. NGOs are required to report on all activities to Ministry of Economy every six months as well as to different line Ministries on national and provincial levels in each sector of activity. Many of these reporting requirements are burdensome and contradictory requiring additional staff to follow up and provide multiple reports.

We hope the revised NGO Law which is in the Ministry of Justice can be rapidly finalized to improve cooperation between NGOs and the Government. And that the Ministry of Economy and the SMAF 24 Working Group can develop a standard operating procedure for reporting which will be respected by all line Ministries and provincial directorates.

We suggest that the format of the semi-annual report that NGOs provide to Min of Economy be reviewed with NGOs to ensure that <u>data is accurately provided by us</u> in the report and to see how the reports can be used to inform future programming for Government and compared to donor reporting to Ministry of Finance.

3) National Technical Assistance (NTA) Salary Scale - We do not believe this salary scale should apply to our core staff (it applies only for those in Government programs) so under SMAF Indicator No. 22

we would like to ask the Government to drop the requirement that NGOs must apply NTA salary scales to their staff and instead allow compliance to be voluntary.

4) We recommend all Line Ministries and local provincial authorities include NGOs and civil society systematically in your planning and program reviews, as well as provide on time information to the public. We have some good examples of this inclusion - the National Procurement Authority where NGOs and civil society are participating as observers and the Afghanistan Sustainable Development Goals (A-SDGs) agenda led by Ministry of Economy where ACBAR and other CSOs are participating in working groups and the Executive Committee. This good practice should be built on by all Line Ministries and Government bodies to build up better trust and respect between us.

In the next two days we look forward to the panel discussions in health, education, rural development, refugees and IDPs and social protection. In this room today we have a lot of experience in all these sectors so let us share our knowledge and learn from each other.

Thank you very much

Fiona Gall, Director.

Annex 2

Training Department Report Jan – Dec 2018

#	Date	Province	Donor Training Su	Training Subject	#	# participants		
					Total	Male	Female	
1	01 – 04 Jan 2018	Herat	Japan	Project Design	25	7	18	
2	08 – 11 Jan 2018	Kapisa	Japan	Project Design	18	17	1	
3	27 – 30 Jan 2018	Helmand	Japan	Project Design	22	22	0	
4	28 – 31 Jan 2018	Nimroz	Japan	Project Design	25	18	7	
5	24 – 27 Feb 2018	Khost	Japan	Project Design	27	23	4	
	06- 09 May 2018	Kunduz	Johanniter	International Humanitarian Law	19	14	5	
6	25 – 28 Feb 2018	Nangarhar	Japan	Project Design	33	30	3	
7	06-08 May 2018	Bamyan	Japan	Monitoring and Evaluation	21	14	7	
	09-10 May 2018	,	-	Sphere Project	16	10	6	
8	08- 10 July 2018	Nangarhar	Japan	Monitoring and Evaluation	22	19	3	
	11-12 July 2018			Sphere Project	17	16	1	
9	12 – 14 Aug 2018	Badakhshan	Japan	Monitoring and Evaluation	30	8	22	
	15-16 Aug 2018		- · r	Sphere Project	30	8	22	
	02-04 Sep 2018			Monitoring and Evaluation	33	29	4	
10	02-04 Sep 2018	Kunduz	Japan	Sphere Project	33	29	4	

	Date	Province	ce Donor Training Subject	Training Subject	# participants		
#					Total	Male	Female
1	07– 11 Oct 2018	Herat	Japan	Monitoring and Evaluation	26	10	16
2	07 11 00(2010		Supun	Sphere Project	23	9	14
3	25– 29 Oct 2018	Takhar	Japan	Monitoring and Evaluation	25	11	14
4	23 23 000 2010	Takilai	Japan	Sphere Project	21	9	12
5	07 – 12 Nov 2018	Daikundi	Japan	Monitoring and Evaluation	23	12	11
				Sphere Project	18	11	7
6	16– 20 Dec 2018	Balkh	Japan	Monitoring and Evaluation	25	14	11
7			,	Sphere Project	19	13	6
		1	1	Total	551	353	198