

PUNTLAND - Recommendation and inputs of JPLGIII draft documents.

Quick General Observation in Pro-Doc.

- As per the current draft Pro-Doc suggests, particularly the proposed program management structure, Puntland seeks special consideration in dealing the program management i.e. Puntland steering committee should be formed with members of the RCO office, program management unit, agencies and donors and be provided necessary support in carrying out its functions and not to include with the emerging states. A good example of the complications that may arise the currently suggest structure in the draft Pro-Doc is the tensions created by the emerging states on the allocation of more funds to Puntland by the World Bank capacity injection mechanism program, where the currently emerging states questioned why Puntland government was given a significantly more funds compered to them, thinking that funds are allocated by Name of the state only.
- There is no depiction of activities/interventions/priorities (even in the log frame) – better to capture government priorities at least in the log frame.
- Civil registration, land registration, emergency preparedness, business licensing and revenue generation, though they contribute/impact service delivery but they require intensive and targeted capacity-building, so why consider them as potential areas for capacity-building (under Outcome 2)
- Clarify if the allocation for outcomes 4 (20%) includes additional components e.g. PPP, civil registration, land registration, emergency preparedness, business licensing and revenue generation).
- Descriptive and repetitive narrative and literature text overtaking each section – focus is to be shifted towards what is to be done, and how?
- Government Led expansion strategy in Puntland was drafted in 2016, however, its implementation depended on the partners and the government to agree on, this did not happen anyway. However, immediatly the JPLG III Pro-Doc should focus realistically based government led expansion by allowing more districts of Puntland to be extended annually which in this draft Pro-Doc was poorly articulated, how can we extend one districts each year despite having 21 legitimate and qualified

districts in Puntland. We are proposing to add two additional districts in 2018 in the current 9 target districts, we are also enthusiastic and committed to add two more districts annually in parallel with the LDF graduation initiatives.

- Service delivery funding should be increased up to (35%) – not in Puntland case where the most policies are in place although they are not fully implemented; what is the rationale for this allocations, we also understand that emerging states need more in policies development, but in our Puntland Context we need to focus grants funds due to the ongoing sector decentralization initiatives and need for local development funding for the target district?

Outcome 1 policy framework: (Focus on Policy Implementation).

- Decentralization policy Implementation, the actualization of the existing policy roadmap.
- Puntland developed and adopted policies and procedure manuals but there are some gaps which need to be address comprehensively (such as land policy, border delineation policy, review local government law).
- Enhanced implementation of existing policies, regulations and frameworks with much emphasize on decentralization policy, fiscal decentralization policy and PPP policy.

Outcome 2 capacity building:

- Capacity building should be district based, where the resources and the skilled experts are available at districts level.
- Continuation of the best practices, for instance, one of the main capacity development initiatives that really worked on the ground/or in the districts is the great and remarkable contributions made by the consultants towards enhancing local capacities at district level, the need to retain the key consultant personnel in order to continue the capacity building and injection seems inevitable for the immediate inclusion of JPLG III Pro-Doc.
- Capacity building course should be translated in to Somali, E.g AWP&B etc.
- LGI is an important institution for the capacity building of local governments. Puntland government strongly believes the promotion of LGI concept and thus proposes that the institution to be based in

Puntland specifically the training center be established in Puntland which will serve the capacity needs of all the Somalia member states. We also advise against engagement of other institutions such as universities for the capacity building of our local governments but rather our LGI that is fully established and provided necessary infrastructure, tools and materials which will enable lasting solutions for LG capacity gaps.

- In JPLG II MOI has been able to support the local governments of Garowe and Qardho in their exercise of Revenue Mobilization and Enhancement Action Plan which they produced clear action plan to promote and enhance their revenue and it was successful. Unfortunately the action plans have not got full support from the JPLG to implement. Therefore, we urge the ProDoc of JPLG III to ensure such crucial activity to be taken forward and extended throughout the LGs which will help them to capacitate and address the issue of revenue and thus better service delivery.
- Local governments in Puntland are basically built through local mechanism although they have been supported to standardize their efforts in better local governance that is able to provide equitable services to its citizen. International exposures on how the local governments operate is deemed important for them to learn and share the experience through study tours which at the end help them to transform.
- AIMS and BIMS to be improved and made it better system.
- Annual periodically scheduled capacity building refresher trainings to be held continually.

Outcome 3 Inclusive Governance and Gender.

- The program document does not efficiently articulated the policies and laws pertaining to local governments that are required to reflect women representation in council and administration of local governments. For instance there is LAW Number 7 for local a government that is expected to undergo revision hence the program need to contribute in the revision process in its efforts to mainstream gender and advocate women quota. Equally there are policies such as decentralization policy, fiscal policy, and municipal finance policy and among others that are also need to be critically looked and take into account gender sensitivity.

- A Puntland government acknowledges the need of wider public awareness and sensitization towards the importance of women participation and representation of local governments. Although the program document outlined carrying out awareness but strong emphasize should be given this.
- A woman in administration is a big challenge and requires effective approach to realize their participation and representation in administration units. For example, there are positions that are filled through nomination and such positions should seriously be considered women. For instance the executive secretaries of LGs come in through nomination but no woman has ever filled that position in Puntland history.
- Marginalized groups, youth, IDP are not represented in the councils. There is need advocacy at all levels to include and reserve quota for their representation.
- Gender is cross cutting in all the program outcomes but the program document has not demonstrated clearly on how women are participating, their influence. For example, in the service delivery it is only reading that women will be part of these activities but how, what impact will have on them and how they are going to be empowered. Therefore we should be able to address in promoting women's economic, political and social empowerment.
- Youth migration is critical problem in Puntland but it has not been looked. Alternatives should be explored to revert youth migration such as employment creation.
- Gender and women participation mainstreaming cannot only happen in LGs but also at national and state levels. The role of ministries (MOWDAFA) is not observed keeping in mind it is important institution that serves to promote women. Therefore, their role of coordination and programming should be articulated in the program document that clearly explained in the prodoc.

Outcome 4 service delivery

Transition from service delivery models to local government-led service delivery

- Need to clearly articulate service delivery models (LDF, SDM etc.), operation procedure systems and showcase introduced changes/innovations under outcome 4 as shown in output 2.3.
- Detailed information on operational of SDM but no single mention of LDF, its operation procedure in the different contexts.

- No elaboration of LDF transition and graduation/exit strategy – clear articulation on cost-sharing formula over the next five years to ensure responsible exit.
- LDF allocation formula should be based on district grade (A,B) and maturity (Bosaso vs. Banderbayla vs. Burtinle)
- Puntland should have special arrangement within Somalia context (Puntland Development Fund is a priority, similar to Somaliland)

Municipal Civil Registrar Services

- Specific contextual realities as a rationale for intervention while not depicting the wider Somalia context; Puntland (Gender) and Somaliland (civil registration). Need to provide a balanced picture of all contexts.

Budget outline inputs

- Average fund should be 350,000 per district (yearly 1-2) and total annual allocation budget 3,150,000 (this budget include LDF,SDM, LED, sub-grants)
- Operation cost should be reduced worthwhile grand fund should be increased
- Puntland government commit to increase 2% of its fiscal transfer to the districts
- Budget outline should following :-

	2018	2019	2020	2021	2022
Policy framework	20%	20%	20%	19%	18%
Human resource capacity and system	25%	24%	24%	25%	26%
Inclusive local government and gender	20%	21%	22%	23%	24%
Local government delivery service	35%	35%	34%	33%	32%
TOTAL PROGRAMME FUND	100%	100%	100%	100%	100%

Proposed Pro-Doc Expansion for the Districts.

- Puntland government is committee and thoughtful about the expansion of districts, the Pro-Doc should be as it shown below table, as we have the capacity and commitment to deliver such a demanding situation.

2018	2019	2020	2021	2022
11	13	15	17	19

THE END