COMMENTS ON THE UNFPA DRAFT COUNTRY PROGRAMME DOCUMENT FOR SOMALIA

First regular session 2026

Comments by Germany	UNFPA country/regional office response to comments
We regard the work on sexual and reproductive health and rights (SRHR) as well as against gender-based violence (GBV) as essential, particularly in a challenging context such as Somalia, where prohibitive cultural, social and religious norms still persist. In this regard, we highly appreciate UNFPA's engagement there and we congratulate its dedication to continue its important work despite financial and other challenges at the international level.	UNFPA greatly appreciates Germany's continued partnership and commitment to strengthening sexual and reproductive health and rights (SRHR) and countering gender-based violence (GBV).
Germany remains committed to continue its support for strengthening SRHR and countering GBV.	UNFPA thanks Germany for the thoughtful comments on the CPD, which are valuable contributions toward further strengthening the implementation of the programme.
With regard to UNFPA's new CPD we would like to highlight the following: Germany trusts that the CPD has been developed with the UN80 initiative in mind and strongly urges UNFPA to strive for enhanced cooperation with UN entities	We appreciate Germany's comments on the importance of the UN 80 initiative for a modern, efficient, and collaborative United Nations system. UNFPA fully supports this vision, and the Somalia Country Programme was developed with these principles at its core. Alignment with UN80 and strategic coordination
active in the project country, be it through joint programmes, shared office space, shared-back offices and other efficiency measures wherever possible. Any duplicative efforts regarding the activities of UN or other programmatic entities must be strictly avoided.	The CPD aligns with the UNSDCF 2026-2030 and the United Nations reform efforts, with UNFPA firmly positioned within the Social and Human Capital Outcome of the UNSDCF. To prevent duplication and promote synergies, UNFPA will exercise strategic leadership within relevant UNSDCF Result Groups.
Germany trusts that UNFPA will pursue its programme	Joint programming and efficiency
activities in line with its core mandate and comparative advantages, coordinated closely with the Resident Coordinator's office, and will avoid undue competition with other UN entities.	The programme emphasizes joint programming to leverage comparative advantages and avoid duplication. Key joint initiatives include Universal Health Coverage (with WHO), GBV (with UNICEF, UN Women), Anticipatory Action (with OCHA, WFP), and Data for Development (with UNICEF, IOM, UNHCR, WHO, and others). UNFPA Somalia is also

Looking at the present security situation in Somalia, at uncertainties regarding the AU-Misson AUSSOM and at (upcoming) elections that might lead to a further deterioration of the security situation, the question of "access" to project sites becomes ever more pressing. In this regard and looking at the fact that UNFPA (only) maintains field offices in Hargeisa (Somaliland) and Garowe (Puntland) we would strongly suggest for UNFPA – as for other UN actors, NGOs and implementing agencies – to adopt third-party-monitoring as a standard in all projects and (pre-)allocate sufficient funds for this already in the project design phase. Here we would like to remind UNFPA of the findings of the UN's "post-delivery aid diversion" report of 2023 that we should all not forget.

exploring efficiency measures with the UNCT, including shared services and back-office functions, and currently leads a common service for shared premises (UNFPA, UNCDF, OCHA, UN Women).

Security and monitoring concerns

We acknowledge Germany's concerns regarding the complex security environment, humanitarian access, and the critical importance of accountability and aid diversion prevention.

- 1. Third-Party Monitoring (TPM): UNFPA notes the recommendation regarding adopting TPM as standard practice, committing to integrating pre-allocated budgets for it in project designs. The programme includes monitoring in remote areas and will use remote and third-party arrangements in a systematic manner. UNFPA will continue to work within the parameters of the United Nations engagement and risk assessment for Somalia including for aid diversion.
- 2. Strengthening Accountability (ref comments on the: "report of 2023"): in the programme, UNFPA reaffirms its commitment to enhanced accountability via expanded assurance activities, widely known fraud reporting channels, and strengthening implementing partners' financial management capacity. TPM will be central to this framework.
- 3. Adaptive Management: The programme's focus on adaptive management addresses access constraints. We will work with the United Nations Access Working Group and use scenario planning to adjust implementation, relying more on TPM and remote management to ensure continuity of essential SRH and GBV services.

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