**Responses to Comments on the SRPD for 14 Pacific Island Countries and Territories**

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| **Asia Pacific Country**  | **Comment by Member State** | **Suggested response**  |
| **Pacific Office**  | **Australia-**Australia appreciates the opportunity to provide comments on the UNDP Sub Regional Program Document (2018-22). Our comments expand on feedback we provided through Suva Post (to the UNDP Pacific Office) in December 2016 and March 2017.We would like to thank UNDP and member states for all the work that has gone into getting this document to a mature draft. We welcome the opportunity to work together to ensure it supports efforts towards making the UN fit for purpose in the Pacific.We note that sub-regional programming documents are particularly complex and it can be difficult to capture all the issues at play within the word limits and timeframes afforded by the Executive Board. We would welcome a future conversation around how to address this whilst promoting an effective and efficient running of the Executive Board. We are available for further discussions to clarify our thoughts and suggestions as set out below. | UNDP Pacific Office in Fiji and Samoa Multi-Country Office would like to thank Australia for the thorough review of the draft UNDP Pacific Sub-Regional Programme Document (SRPD) (2018-2022). We appreciate Australia’s keen interest in the SRPD and acknowledge the two interactions with DFAT in Suva and the discussions during the High Level Consultations with Australia in March in Suva. Following the phone discussion between the Pacific Office in Suva and DFAT in Canberra, the document has been revised to address DFAT’s feedback. Since the size the of the document does not allow UNDP to incorporate all the details, answers to most of the technical issues raised and responses to the comments are provided below against each comment.  |
|  | **General comments*** The document should set out more explicitly its purpose and its links to the draft UNDP Strategic Plan, the near-final UN Pacific Strategy and other frameworks (Agenda 2030 (including Addis), QCPR, SAMOA Pathway and the Pacific Regional Framework)
	+ we would like to see a clearer articulation of how the document has been developed in sequence with the Strategic Plan and Pacific Strategy and how it has taken account of the directions set out in the QCPR
	+ we recommend inclusion of a review clause to underscore that there is a formal mechanism for amending the document to align with the global strategy documents that are yet to be finalised
	+ the relationship between the indicators identified in this plan and global (QCPR, Strategic Plan), national (SDGs) and Pacific Strategy indicators needs to be more clearly understood to support system-wide transparency and accountability
	+ and a mid-term review point should be identified (particularly to assess progress on implementation of multi-country office reform and flexible presence models coming out of QCPR mandates)
 | A paragraph (no. 6) has been added in the revised document to address this comment. It articulates that the document will be revisited after the adoption of the new strategic plan to align UNDP programme in the Pacific to the strategic plan outcomes, indicators, targets and accountability framework. Alignment to the integrated results and resources framework of the new corporate Strategic Plan had earlier been covered in the M&E section of the document (see current para 51). The new para paragraph 6 also explains how UNDP programme will support the organizational response to the Secretary-General's call for repositioning of the UN development system, as a follow-up the Quadrennial Comprehensive Policy Review of United Nations operational activities for development. At the same time, UNDP will continue responding to country needs within the framework of implementing the SDGs under the auspices of the United Nations Resident Coordinators.The links to the Pacific Strategy are mentioned in paragraph 21 and paragraph 28.A paragraph (no. 25) refers to a regular partnership review mechanism at regional and country levels alluding to a consistent dialogue with DFAT on UNDP’s partnership and synergies with Australia at country level on the ‘how’ of UNDP’s support in the Pacific. It should be noted that mid-term reviews are not a mandatory requirement for CPDs, and are usually linked to broader UN-system review and evaluation processes (of UNDAFs or equivalents). |
|  | * **The document conveys only a very general sense of how UNDP will address the needs of particular countries in the region; it could:**
	+ **provide a link to where country-specific information can be accessed;**
	+ **recognise the role of other partners working on the same issues and contributing to the results (as per the Results Framework);**
	+ **more clearly articulate how multi-country strategies provide clear, concrete ways to consolidate administrative costs and functions;**
	+ **clarify how programming will be tailored to the needs of individual countries**

**while the document makes the point that the “sub-region is not homogenous”, for each of the outcome areas listed in Part II, the document could specify the circumstances in which these programs are priorities, the countries that will be targeted and why it is important to focus on that priority issue in these countries, communities or contexts; and*** + **provide more detail to reflect how diversified programming models can be used in the Pacific.**
 | Given the size limitation of the SRPD, it is not possible to provide details of how UNDP will address the needs of particular countries in the region in the document. However, UNDP programme is anchored in the United Nations Pacific Strategy (UNPS), which contains more detailed information on country-specific prioritization of support as well as progress monitoring. This information is in paragraph 21 of the document. The UNPS contains country pages for each of the 14 PICTs, as well as country-specific SDG measurement matrices. UNDP and other UN partners have worked together to produce those, and they correspond to SRPD as well. This is a practical link between UNPS and agency frameworks such as SRPD.Details on partnership and the role of other partners are provided in paragraphs 7, 8, 23, 25 , 31, 33, and 38. The diverse programming models that UNDP use in the Pacific, such as national implementation, national implementation with support services and direct implementation are explained in paragraph 41. |
|  | * **We would welcome further clarity in the document on UNDP’s comparative advantage in the region**
	+ **including what UNDP is bringing to the table that is not provided by other development partners (eg. by other UN agencies and donor bilateral programs) across the three outcome areas (eg. Para 28 refers to UNDP providing targeted policy and technical advice and assistance at national and regional levels, but there is no specific articulation of UNDP’s particular value add)**
	+ **and a rationale for the areas UNDP has prioritised over others.**
 | UNDP comparative advantage and value added are referred to in several paragraphs, for example paragraph 7, 33 and 36 which provide information on UNDP’s past support and achievements, its work with partners, and its comparative advantage in specific fields. Of the 6 outcome areas that emerged of the national consultations for the UN Pacific Strategy, UNDP prioritized the three areas of: 1) Resilience and sustainable development; (2) Sustainable and inclusive economic development; and (3) Effective governance for service delivery for the following reasons:1. They are part of UNDP mandate and address identified needs by the Pacific Island countries themselves.
2. UNDP has the experience, technical know-how and knowledge networks locally, regionally and globally to respond to the needs of the Pacific countries in these areas.
3. UNDP, through its past and current work in these areas, have achieved results and have established partnerships that will enable it to continue making positive contribution in these areas.
4. Gender and human rights are mainstreamed throughout UNDP’s work in the three areas it has prioritized.
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|  | * **The document usefully canvasses the development challenges in the subregion and ways of working to address them. However, the document could be more specific about what UNDP programs will deliver on the ground and how.**
	+ **In setting the scene for UNDP’s presence in the region, and answering the ‘what’ and ‘how’ of what it will achieve the document could usefully paint a picture of UNDP’s actual presence in the region (eg. office structure and staffing profile), and in this context how it is pursuing the One UN policy. (It could additionally provide a link to where this information is captured and updated online.)**
	+ **The narrative also highlights that it will increase engagement with the private sector and civil society at regional and national level, but it needs to identify how and where (i.e. with respect to issues/activities) it intends to do this.**
	+ **There is mention of prioritising marginalised groups, but there needs to be a more explicit articulation of the ‘what’ and ‘how’ of UNDP’s inclusion agenda, and how what UNDP does will contribute to leaving no one behind.**
 | Brief information on UNDP structure in the region is provided in footnote 1, because of space limitations, it is not possible to provide additional information in the document. The UN Pacific Strategy provides information on the UN (including UNDP) joint presence in the Pacific and how UN agencies will be work together to support the PICTs in achieving their development aspirations. As discussed separately with DFAT, UNDP will produce a web page to capture how it covers the PICTs representationally and programmatically.Engagement with the private sector will be increased in all of UNDP’s areas of work and this is referred to throughout the document, for example, engaging the private sector in the humanitarian-development nexus is elaborated in paragraph 31, in voice and participation in paragraph 34, in responding to poverty and hardship, in the health sector is paragraph 38. The groups targeted by UNDP interventions are mentioned in paragraph 20. Further details on how UNDP will continuously refine its targeting to ensure that no one is left behind are provided in paragraph 33. UNDP will work closely UN agencies and regional organizations engaged in data generation, such as UNFPA, UNICEF and the Secretariat of the Pacific Community, to collect data. The data will be used, in addition to tracking progress towards national priorities and their links to regional and global development priorities, to identify groups to be targeted with specific interventions.  |
|  | * **The decision that was taken at the first sessions of the Executive Boards in 2017 to develop a shared “chapeau” across fund and programs’ strategic plans outlining their contributions to the 2030 Agenda and SDGs needs to be reflected in this document by explaining what UNDP will contribute to achieving the SDGs vis-à-vis other agencies, including its contribution to shared indicators**
	+ **although the document sets out the thematic and geographic areas where further work is required to achieve the SDGs, these areas should be linked to specific, targeted action items throughout the document.**
 | As a relatively concise strategic document, SRPD does not go into activity level details. Some of this information is reflected through UNDP outputs, while further details are given in the country pages of the UN Pacific Strategy for each of the 14 PICTs, as well as country-specific SDG measurement matrices. These have been developed with direct UNDP inputs and specify collective UN and partners contributions to the SDG implementation at country level. |
|  | * **We would like to see more detail about how UNDP will contribute to the identified outputs (what it is doing, how much funding it is providing, etc.), at both a regional and country level.**
 | The SRPD is a framework document, developed according to specific guidance provided by UNDP corporately. The space limitation does not allow for elaboration of UNDP’s contributions to the identified outputs through specific activities. UNDP project documents, in the three prioritized areas, will provide this level of detail, on how UNDP will contribute towards the output and the level of funding that will be available for the particular initiative. With regards to funding, the overall projected resource envelope and how it is distributed among the three outcomes is provided in the document. Details of regional and country allocations are not available at this stage and part of the resource envelope is still to be mobilized.  |
|  | * **The document could benefit from bolstering its approach to joint programming and collaboration coming out of the UN Pacific Strategy**
	+ **if specific examples are not available, the document should point to circumstances where joint programming, advocacy and analysis will be given preference and who likely the partners will be.**
	+ **UNDP could usefully identify the synergies it plans to promote, how they will be pursued and why they are valuable.**
	+ **UNDP could also articulate how it is working with senior decision makers in the Pacific and using the expertise of donors and regional organisations to assist with taking their work forward jointly.**
	+ **UNDP could also set out how it proposes to use partnerships strategically to promote leverage, identify synergies, mobilise finance and work with others to accelerate progress towards the SDGs (including through the MAPS framework).**
	+ **Goal 17 should be referenced explicitly in the document, particularly given how important partnerships are to the delivery of all outcomes in the Pacific.**
 | Potential areas of joint programming among UN agencies are outlined in the Pacific Strategy under each Outcome. A number of joint programming initiatives are currently ongoing, examples include the following projects/programmes: Pacific Financial Inclusion Programme with UN Capital Development Fund, Markets for Change with UN Women and Regional Pacific Anti-Corruption Prgoramme with UN Office on Drugs and Crime. Building on these successful initiatives, UNDP will work jointly with sister UN agencies, to address regional and country needs, where collaboration results in a more effective and efficient response, where the comparative advantage of each agency is leveraged and its contribution, both financial and technical, has the potential to achieve more impactful results working jointly.UNDP is an active member of the Regional SDG task force and the Sustainable Development Working Group, closely collaborating with UNFPA, UNESCAP, UNICEF, the Secretariat of Pacific Community, and other development partners. UNDP contributed towards the preparation of the Pacific Road Map for Sustainable Development, which guides the regional efforts towards the implementation and monitoring of the 2030 Agenda and the Sustainable Development Goals. UNDP also supports the Development Finance Assessments which enable countries to map all sources of revenue available for implementation of the 2030 agenda.UNDP is planning two MAPS mission in 2017 and one in 2018. The MAPS mission will be undertaken in close collaboration with UN agencies and development partners active in the countries. The missions will inform the acceleration efforts and programme support to be provided to the countries. Goal 17 is referenced in paragraph 33.  |
|  | * **The document could provide a clearer narrative on UNDP financing by integrating the Addis Ababa Action Agenda**
	+ **and explaining how alternative financing options will be integrated (or trialled) in the Pacific, how the donor pool will be diversified, and how national financing strategies, private sector engagement and flows from international financial institutions will be leveraged to mobilise resources.**
 | Paragraphs 25 and 45 provide information on UNDP’s resource mobilization plans using different sources of finance.  |
|  | * **While the document indicates capacities in the UNDPPO and Samoa MCO will be “increasingly pooled”, it should provide more concrete analysis on why and what this would arrangement look like**
	+ **and address how it will mitigate the risk that concentrating staff in hubs may diminish UNDP’s ability to respond rapidly and erode UNDP’s understanding of the unique challenges in each country. (To this end, any further pooling of knowledge and expertise, including UNDP’s advisory and policy role, should be considered carefully as a way to support better in-country operations.)**
 | UNDP, in addition to its Offices in Fiji and Samoa, has its presence in the other Pacific Island countries, through UN Joint Presence Offices and its project staff, who have a good in-depth knowledge of the unique challenges of each country and play a critical role in communicating the realities of each country and in informing UNDP’s design of its programmes to respond to the specificities of each country. In addition, UNDP has a strong partnership with national institutions in each country and UNDP’s advisory and policy role is always in response to country needs as identified in country. UNDP agrees that increasing country-level programmatic presence would be highly beneficial for in-country work. As such, it has established dedicated programme implementation capacity in Vanuatu and Kiribati, in addition to supporting UN Joint Presence Offices. Further replication of this approach will be desirable subject to availability of resources for such dedicated programme staff and the size of country-level programmes.  |
|  | **Specific Comments –**  |
|  | * **Para 6: Australia acknowledges UNDP’s efforts to assist with SDG localisation, but there are overlaps with funding Australia already provides to organisations such as the Secretariat of the Pacific Community’s (SPC) Statistics for Development Division (SDD), Pacific Financial Technical Assistance Centre (PFTAC), and the Asian Development Bank (ADB) to implement activities of SDGs**
	+ **it would be useful is for the narrative to draw out UNDP’s specific contribution (focus), distinct from that would is provided by these other partners**
	+ **in its efforts to collect robust data to inform program design, implementation and evaluation, UNDP should also articulate how it will work with SPC’s Statistical Development Division to do this work across the Pacific Island Countries.**
 | **Some changes have been introduced in line with the comment. As an active member of the Sustainable Development Working Group and the SDG Task Force, UNDP coordinates its support with that provided by other partners and ensures that there is no duplication of effort. During the MDG era, UNDP led the support to Pacific Island Countries in reporting on MDG progress (about 20 National MDG reports across 14 PICs), tailoring and mainstreaming MDGs into national planning processes, raising awareness and campaigning for the achievement of the global agenda (relevant to the local context), developing and implementing tools for the acceleration of MDG targets that are of national priority but lagging behind in progress. UNDP is currently providing the same line of support for the SDGs to most PICs. In addition, UNDP is supporting PICs in creating better vertical and policy coherence, multi-stakeholder partnerships for funding, implementation, M&E, and improving transparency and accountability. UNDP is promoting the use of innovation, technology, communications and effective tools for the implementation and monitoring of National and Global Sustainable Development Goals.** **UNDP focus is on collecting available data from existing sources, such as Census, Household Income and Expenditure Surveys, Demographic and Health Survey, etc. as well as from administrative data sources mainly Government Ministries but also Statutory Bodies, Private Sector and NGOs. The data will be used for tracking progress towards national, regional and global development goals, identifying groups to be targeted and for the analysis and formulation of evidence based pro-poor policies and SDG Acceleration Frameworks.** **UNDP will work closely with SPC’s Statistical Division in identifying potential SDG data that could be found in administrative systems, although it is noted that SPC will not be working on strengthening administrative data systems. In addition, UNDP will work with the SPC’s Statistical Division in identifying the demand for such data as well as for data from national surveys based on development priorities that have been identified through in depth consultations with all stakeholders including governments and private sector service providers.** **UNDP uses the Development Finance Assessment, which is a tool for assessing the flow of the revenues (from all sources - local and foreign) to a particular country. The assessment provides recommendations on how the country can increase its revenue flows as well as improve the collection of government revenues from existing sources. UNDP acknowledges the work of the Pacific Financial Technical Assistance Centre (PFTAC) in improving Public Finance Management (PFM) Systems, through the Public Expenditure and Financial Accountability (PEFA) tool. It is worth noting that the Development Finance Assessment and** **Public Expenditure and Financial Accountability are two separate tools which complement each other, the DFA aims at identifying the sources of review and increasing the generation of public funds, whereas the PFM/PEFA focuses more on the management and accountability of public finances.**  |
|  | * **Para 6, sentence 4: suggest changing this sentence from “…UNDP supported regional organisations in the design…” to “…UNDP worked in partnership with the Pacific Islands Forum Secretariat (PIFS) and other regional partners….”. (The original sentence seems to imply that UNDP provided all of the work in developing the SDGs Roadmap when it was in fact a collective effort).**
 | Changes have been made. |
|  | * **Para 8: On gender equality , there are a number of development partners (UN Women, SPC, PIFS, Pacific Women Shaping Pacific Development) working promoting gender equality and Women in Politics/ leadership space, so it would be helpful to get a sense of how UNDP is working (and intends to work) with other partners and ensuring there is no duplication of support.**
 | Changes have been made in paragraph 36, where UNDP introduces its programme priorities. In paragraph 8, UNDP is providing the situation analysis.  |
|  | * **Para 17: Australia is interested in how the UN system responds to SDG implementation priorities taking into account the policy context at the regional level (e.g. Framework for Regionalism), and responding to national plans**
	+ **it would be ideal to add examples of this (through support for the Sustainable Development Working Group and the Regional SDG Taskforce)**
	+ **and elaborate what is the best way for sharing the responsibilities among agencies working in the region (SPC, UNDP, UNFPA, UNICEF, PIFs) to ensure they are complementary.**
 | The UN System response to SDG implementation is coordinated through the UN Resident Coordinator Office. UNDP and ESCAP represent the UN in the Regional SDG Taskforce. Internally, UN agencies identify and share responsibilities among agencies working in the region for the implementation of the SDG Roadmap, which will be presented for endorsed by the Pacific Leaders in September 2017, as well as responding to country specific SDG support.  |
|  | * **Para 18: suggest shifting this to the beginning of the document – it provides the purpose/overarching context.**
 | Based on the expected structure of the document, as per the corporate guidance, the beginning of the document focuses on the situation analysis and programme rationale. Paragraph 18 focuses on partnerships and programming modalities.  |
|  | * **Para 26: suggest providing a rationale as to why UNDP has identified these three outcome areas – what is the relevance to the Pacific context?**
 | A rationale is provided (paragraph 28 in the revised document). In addition, please see page 3 of this document, which provides information on why UNDP identified the three outcomes areas.  |
|  | * **Para 36: On health: SPC, WHO, UNFPA and UNICEF already implement activities in the health sector, in addition to bilateral programs (Australian programs included)**
	+ **the narrative should provide a clear sense of what it is UNDP intends to focus on in this sector that other partners are not already contributing to/working on – ie. its comparative advantage.**
	+ **again, it is important that UNDP doesn’t duplicate the work of other partners at regional and bilateral levels, noting that UNDP is also a ‘newer’ player to the health sector in the Pacific.**
	+ **On NCD: How are UNDP and SPC interacting in this space, noting particularly SPC’s significant role in multisector action on NCDs in the region**

**what does the level of ‘work commitments’ actually require from UNDP?** * + **Sentence 4: include “…HIV/AIDS” not just “…AIDS…” for consistency, as the rest of the document refers to HIV/AIDS where mentioned (e.g. Para 15).**
 | Details addressing this comment are provided in paragraph 38. UNDP comparative advantage can be summarized as follows:* UNDP is the UN’s leading agency on governance and sustainable development and can foster coordination beyond the health sector to act on the social, economic, environmental factors that determine health and its distribution. An example of this stream of work is UNDP’s work in NCDs and the Law and NCDs and Trade, where UNDP plays a broker role between health and other sectors. UNDP played an important role in bringing WHO and SPC together in the Trade/Trade agreements and NCDs space in 2013. UNDP support the analysis of NCDs as a socio-economic/development issue rather than a bio-medical health issue only. UNDP works with and in support of other actors such as WHO, SPC, World Bank. etc).
* UNDP has the benefit of multiple entry points in different sectors and with actual project on the ground having significant impact on NCD related behaviors, such as investment, private sector development, gender, governance, etc.
* UNDP has extensive global expertise in implementing large health programmes. In partnership with the Global Fund to fight AIDS, TB and Malaria, UNDP provides implementation support services for health programmes, as well as strengthening financial and risk management, procurement systems for health commodities, monitoring and evaluation, support for civil society engagement and additional resource mobilization. UNDP approach to health programmes is multi-sectoral, taking into consideration UNDP normative agenda, with a focus on people-centered policies and human right, and its central role in capacity development.
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|  | * **Para 37: This is quite a broad statement with little information on the specific issues it will focus on, why and how. It is important the narrative provides this.**
	+ **for example, the paragraph refers to “Centre-periphery mobile service delivery” – what is this and why is it important to the work UNDP intends to do in this space?**
 | More details are provided in paragraph 39.  |
|  | * **Para 38: As per the general comments above, what is missing under the Program Management section is how the SRDP 2018-2022 aligns with the new Pacific Strategy which in turn show should show alignment with the QCPR: the new SRDP needs to be integrated in an effective and transparent way.**
 | The alignment with the Pacific Strategy is explained in paragraphs 21 and 28. How UNDP Pacific will support the corporate response to the QCPR is mentioned in paragraph 6.  |
|  | * **A bulk of the budget from the UNDP 2016 Annual Report was around costs for workshops & missions and staff salaries**
	+ **this document should address how UNDP will, through the SDRP, ensure cost-effective approaches to the One UN Policy.**
 | UNDP 2016 Annual Report to DFAT covered only DFAT “Core Funding” to the Pacific Regional Programme, which for 2016 was US$ 1.2 million of a total delivery of more than US$ 30 million for the Pacific Office in Fiji. DFAT Regional Funding is mainly used for policy advisory support services, not programmatic activities per se and hence the high proportion of expenditures for workshops, missions and salaries of advisors and technical staff, who provide the policy advisory services.UNDP, in its programmatic and policy advisory support, adopts efficient and cost-effective approaches, and operational and procurement modalities, which ensures value for money. |
|  | * **While we commend UNDP for setting targets through the Results Framework, the methodology is unclear (eg. it is difficult to judge baselines and would be useful to understand how UNDP determine number of countries), and there is no explanation as to how the targets will be realised.**
* **On Outcome 1, we would appreciate clarification of what steps UNDP will take to work across the humanitarian/development nexus, particularly in the area of disaster risk reduction, noting this was a clear instruction in the QCPR**
	+ **while noting a strong emphasis on resilience in the document, part of bridging the humanitarian/development nexus should be UNDP’s work on early recovery, given UNDP is the cluster lead for this body of work, and this should be given greater emphasis.**
 | The Outcome indicators baselines and targets are those of the UN Pacific Strategy, which were calculated/determined through the joint work of UN agencies. The targets are set based on the planned work of the agencies, the countries in which the concerned agencies are active and the anticipated availability of resources.The output indicators were calculated based on UNDP’s current work. The targets are determined based on the planned work for the next 5 years. For example, Indicator 1.1.3. has a baseline of 0. This reflects UNDP will be measuring the additional number of countries. It would be beyond the scope of our resources to undertake a full analysis of all 14 countries policy instruments for renewable energy, energy efficiency, or energy access. Further, the target of 8 countries is set based on the fact that the current pipeline of projects includes projects in 8 countries (Tuvalu, Samoa, Vanuatu, Solomon Islands, FSM, Niue, Kiribati and Nauru).On Outcome 1, details on how UNDP will work across the humanitarian-development nexus is provided in paragraph 31.  |
|  | * **We would welcome UNDP incorporating indicators for SDG16 into the matrix at Annex A of the document.**
 | At outcome level, some SDG 16 indicators have been selected in the UN Pacific Strategy where appropriate and measurable in the Pacific context. At output level, the SRPD has utilized UNDP Strategic Plan indicators or developed new specific indicators that are relevant and measurable in the Pacific context as none of the SDG 16 indicators was relevant and measurable at the output level given UNDP areas of work in the Pacific.  |
|  | * **Outcome 3: A range of the indicators could be strengthened here:**
	+ **for example, number of budgeted approaches to national development plans, financial inclusions etc**
	+ **while the baseline and targets are useful it is not clear why the targets out to 2022 are not for all countries, why some are unambitious, and what the difference in cost projection is between the current targets and including all countries under the sub-regional document (are some countries left behind under the multi-country office model?)**
	+ **the narrative around Outcome 3 needs to be better integrated into the top of the document**

**for example, the Public Financial Management (PFM) narrative is weak and projectised, and in terms of efforts to increase revenues and strengthen systems, 'financial management' is mentioned only once in relation to investment of the Global Fund and AIDS** * + **reference to local economic development and financial inclusion could be more strongly referenced in the text (they are only referenced at the back of the document in the indicator framework)**

**even if UNDP is not the primarily delivery vehicle, the approach in this document needs to be more holistic as it is key to resource mobilisation against the SDGs and promoting co-investment and program sustainability (and is linked to the targets and indicators).**  | The target as adjusted to 14 countries. Paragraph 51 links to the Public Financial Management. |
|  | **Thank you once again for the opportunity to comment on the *UNDP Sub‑Regional Program Document (2018-22)*. Australia appreciates UNDP’s consultative approach and continues to stand ready to assist.** |  |