

Civil Society Report for OECD-DAC Peer Review

Japan

25 November 2019

**Japan NGO Center for International Cooperation
(JANIC)**

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1. General comments by Japan NGO Center for International Cooperation

The ODA Charter was created for the first time in 1992, and after the first revision in 2003, it was revised and renamed in 2015, and the “Development Cooperation Charter” was established. With this revision, the tendency to demand “high quality (economic) growth” and Japan's (short-term) national interest has strengthened. This is a fundamental mistake. The “economic trickle-down effect” that the Japanese Government believes is only an illusion. Instead, “fair distribution” and “poverty eradication” through the implementation of ODA should be promoted. Moreover, the Development Cooperation Charter defines the basic concept of ODA implementation by the Government, and the Legislature (the Parliament) is not involved in ODA implementation. In other words, in Japan, development assistance is being deployed on a global scale without the involvement of legislatures and sufficient monitoring functions. In the past, civil society organizations in Japan, such as Japan NGO Center for International Cooperation (JANIC), have urged the legislature to increase its involvement in ODA through the enactment of the “Basic Law on ODA” and the establishment of the “Ministry of International Cooperation”.

One of the characteristics of Japanese ODA is that there are many loans. Many of these are devoted to the construction of huge economic infrastructures. However, grants should be increased for humanitarian assistance and social development. While the total amount of ODA has not changed much, the amount of funds for grants has been decreasing, and the proportion of loans is increasing. This may cause again debt issues that have been in debates frequently since the 1980s. In addition to debt issues, since economic infrastructure that generates funds for repayment due to a large proportion of loans is regarded as important, social infrastructure (education, health, etc.) which are necessary to eradicate inequality and poverty, cross-sectoral issues (gender, etc.), are not expanded. This structure goes against the SDGs principles that support for humanitarian assistance should be strengthened.

Regarding the promotion of the SDGs, the Japanese Government states that it is “implemented” by establishing the “SDGs Promotion Headquarters” and the “SDGs Promotion Roundtable”, and the “SDGs Promotion Implementation Guidelines”. However, despite the participation of the Prime Minister and all Ministers, the SDGs Promotion Headquarters has been substantially implemented by the Global Issues Cooperation Division, International Cooperation Bureau, the Ministry of Foreign Affairs, and it is difficult to say that policy cooperation and mutual cooperation between Ministries and Agencies are sufficiently adequate. Moreover, “SDGs Implementation Guidelines”, which were created in 2016 and will be revised in 2019, lack aspects of dealing with poverty and inequality, nor eliminating gender disparities. It is also a big problem that the annual “SDGs Action Plan” is not fully linked to the Guidelines.

Considering that the implementation of ODA, particularly in the Asian region, has caused many social problems, such as human rights violations and debt problems associated with large-scale construction, and the construction of coal power plants that have a negative impact on climate change, there is no “strength in supporting Asia” by the Japanese Government.

2. Specific comments by Japanese NGOs

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Select dimension(s) you want to comment, and delete others.

1. Global efforts for sustainable development
2. Policy vision and framework
3. Financing for development
4. Structure and systems
5. Delivery modalities and partnerships
6. Results management, evaluation and learning
7. Fragility, crises and humanitarian assistance

Describe your comments.

1. Global efforts for sustainable development

The primary purpose of implementing ODA should be “social development”, rather than “growth”. They should aim at “poverty reduction”, “reducing inequality”, “gender equality”, not “quality growth”. It is necessary to consider whether “growth” is necessary as a means of implementation.

Recently, superficial implementation of the SDGs, i.e., “SDGs Wash”, has been addressed by many stakeholders. It is not enough for the Government to just declare the implementation of the SDGs or to formulate the policies. It is necessary to focus on its background: why the current society has become unsustainable. This perspective is completely lost in the current ODA implementation and the SDGs Implementation Guiding Principles by the Japanese Government, as the Development Cooperation Charter tends to seek “high-quality economic growth.”

The “Free and Open Indo-Pacific (FOIP)” strategy is, after all, being promoted by the Great Powers, and the region's small and medium-size countries are alienated. Although the Japanese Government analyzes that “in Southeast Asia and South Asia, democracy, the rule of laws, and the market economy take root, and there is awakening of confidence, responsibility, and leadership.”, in India, which is said to play an important role in connectivity, civic space is shrinking, including restrictions on funding for NGOs.

And also, in Japan, there is a tendency of shrinking civic space, such as a situation in which freedom of expression is threatened, and hate speech against foreign nationals is rampant. If the Government develops a regional strategy, they should not tolerate the shrinking of civic space as described above, but should contribute to the creation of a people-centered society. In order to do this, it is necessary to respect the rights of civil society and improve relationships with various stakeholders such as NGOs.

As for the aid on Education, the Japanese government has been biased toward educational infrastructure. For example, they use the fund for school construction, but there is no spending on teachers' salaries. It is a big problem to make Education sustainable that the school's operating costs (such as labor costs) are not contributed. They should consider the way to contribute the labor costs of teachers, for example, by dividing the term, or making them into loans.

1.1. Efforts to support global sustainable development

Support for global agendas and commitments

Follow-up and review of the efforts by the Government to achieve SDGs, both domestic implementations and international cooperation, should be in line with the procedure of UN HLFP (including its reform). As the Government of Japan is now under revision of "SDGs Implementation Guiding Principles", we request that the new principles should aim to achieve SDGs both within and outside of Japan in 2030, since the period that the new principles cover is 2020-2023, a crucial period of SDGs achievement. Global indicators should be kept track and measured through strengthening the capacity of data collection, as well as in collaboration with wider social sectors, including civil society.

We ask the Government of Japan to specify that they will mainstream "back-casting" method, complying with global indicators on major development issues, and analyze the gap between the current situation and the goals, then set appropriate interim goals and strategies, and implement them. At the same time, we request that as the basis of "back-casting", the new guiding principles will not end in the list of measures to meet each SDGs targets, but will be an integrated and concrete indication of Japan's vision in the world aimed at. We also ask to reflect the urgency, priorities, and interrelationships of the global environment and the sustainability of human society, which the world aims to achieve through the SDGs on the new guiding principles.

Priority issues for global engagement

The primary objective of Japan's ODA must be poverty alleviation through sustainable and equitable development of developing countries. As secondary benefits only, economic returns and diplomatic benefits to Japan may be sought in the mid to long term. It is misleading that the discussion paper of the Advisory Committee of Experts on ODA Charter Review (The Advisory Committee) states "simultaneously realizing economic growth both in developing countries and in Japan". It could give a higher priority to short-term economic gains for Japanese corporates advancing in developing countries than to autonomous development and poverty/inequality reduction of developing countries.

Environmental conservation is an imperative, particularly for the poor people of developing countries whose livelihoods are heavily dependent on nature. ODA can and should be an effective tool for environmental conservation, thus this aspect should be expressly included as one of the major objectives in the revised ODA Charter.

Leadership

The Government of Japan should identify when they are going to publish the next VNR (voluntary national review) on Sustainable Development Goals. The last time they published it was in 2017.

1.2 Policy coherence for sustainable development

Priority issues for policy coherence

The Government of Japan should bridge the gap between the international commitment and the actual implementation of ODA, and end ODA loan for any coal project in order to achieve compliance with the Paris Agreement.

Japan should bridge the gap between the domestic environmental standards and the actual implementation standard of ODA, and end ODA support for the coal power plants which are having poor environmental and health regulations overseas.

Japan should end ODA loan for any project which fails to achieve compliance with the International Covenants on Human Rights. JICA should also revise its Social and Environmental Guidelines to bridge the gap between international commitment and the actual implementation of ODA even in the case of E/S loan.

1.3 Global awareness

The Government needs to strongly promote SDG 4, especially 4.7 such as ESD and GCED for sustainable development which has been weak in the public education.

Efforts towards raising global awareness and citizenship at home

Japan's ODA should involve NGOs from "policy planning phases", not from "project implementation phases". To promote citizens' participation, ODA information disclosure (the amount, sectoral trends, regional trends, collaboration with local partners etc,) and development education should be promoted. As a result of diversification of its implementing partners, Japan's ODA should be channeled through the NGO sector, similar to other DAC countries.

We ask that the Government of Japan clarify the role and the responsibility of the government to achieve the SDGs, while emphasizing the roles of each stakeholder and mutual cooperation, and show the policy and the efforts to stakeholders, such as Japanese citizens and the international society with transparency and accountability.

2. Policy vision and framework

The Country Development Cooperation Policy (CDCP) should be prepared with NGO representatives. For example, in Bangladesh's CDCP, NGOs have been joined before, but have not been invited in recent years. Public comments have been made on the proposed policy, but in Japan it has lost substances: the application period is short, and there are few cases where the opinions received are taken seriously and answered.

As a member of civil society in Japan, we believe that it should be realized that "experts in social development" are placed in the Japanese embassies and JICA offices, as described in the current Development Cooperation Charter. Currently the overseas diplomatic offices have economic (or economic cooperation), political and cultural groups, but due to lacking social development groups, the embassies are unable to respond appropriately to requests to know about the NGO situation and social issues of these countries. In this way, it is difficult to say that the actual condition of the grassroots in the recipient countries is fully understood, and it is necessary to make an immediate improvement.

Overall in the world, ODA originally aim at "poverty reduction", however, the Development Cooperation Charter positions "quality growth" as the purpose. "Quality growth" may be

needed as a means of poverty reduction, but this should not be the purpose.

In addition, the Priority for Development Cooperation says strengthening diplomacy to expand its national interests, as its title says “Strengthening Diplomacy to Enhance National Interest and Achieve International Peace and Prosperity”. The Priority’s three key points includes “1. to strengthen strategic links with Asian countries under the Free and Open Indo-Pacific, assumably to balance China’s influence in the region”, and “2. to create a new growth engine to revitalize the Japanese economy”. It is clearly shown that the government adopts the measures to “strategically” utilize ODA as its central diplomatic policy in order to support Japan’s national interests in narrow sense and to expand Japanese company’s overseas business. The third priority is Human Security and SDGs for tackling global issues. However, Japan should place Human Security and SDGs as a solid foundation and cross-cutting of all pillars, not just one of the pillars.

The Japanese government has strengthened commitments to expand infrastructure exports to major Asian countries. The state-led initiative of the Export Strategy for Infrastructure Systems established by the Management Council for Infrastructure Strategy sets a governmental goal that Japanese companies should receive orders for infrastructure projects with a total value of approximately 30 trillion yen in 2020, and the government recommends to utilize ODA to achieve the goals. We are concerned that the government’s “Strategic utilization of ODA” and we recommend that Japan should use ODA to achieve “LNOB (Leave No One Behind)” and 2030 Agenda.

2.1. Framework

Vision

ODA or international development cooperation should not be regarded just as means to serve diplomatic and economic benefits of Japan. The Government has emphasized in the last two decades that "ODA should be used towards serving national interests", however, It should have an internationally shared common goal to support the self-reliance of the people of developing countries in line with the international human rights related standards. Japan’s ODA should enhance its strategic edge by highlighting its peaceful and humanitarian principles.

Scope

The Government of Japan should clearly define the people of developing countries as the primary beneficiaries of Japan’s ODA.

2.2. Principles and guidance

The Government of Japan should clearly define the alleviation of poverty, the reduction of inequalities, and the realization of equitable society as the primary objectives of Japan’s ODA.

Poverty reduction and leaving no-one behind

Japan’s ODA should contribute to the reduction of inequalities within respective developing countries by empowering marginalized people that tend to be left out of national economic growth processes and by enhancing income redistribution systems.

2.3. Basis for decision-making

Inclusive development partnerships

For Japan's ODA to effectively eradicate poverty and inequalities based on the principles of 'sustainable development', 'non-militarism', and 'fundamental human rights', there must be proactive disclosure of information on as well as citizens' participation in ODA. Therefore, the Government of Japan must clearly mention that it will encourage citizens' participation and information disclosure. Likewise, the GoJ should mention that its ODA will strengthen development education to promote Japanese people's understanding about the relations between their lives and developing countries. Japan's ODA, for its delivery, should strengthen its partnership with NGOs that are directly reaching the poor people of developing countries and are familiar with the social environment in those countries. As a mid-term bench mark, the rate of Japan's ODA channeled through NGOs (2.2% as of FY2016) should be increased up to the level of other DAC countries (15% as of FY2016).

3. Financing for development

In addition to supporting the capacity improvement of tax collection agencies in recipient countries, the Japanese Government should raise the necessary funds for the enforcement of the SDGs and climate change measures by introducing International Solidarity Levies. In January 2019, the Japanese Government was assigned to the chair country of the Leading Group on Innovative Financing for Development, and expressed its willingness to introduce International Solidarity Levies at subsequent international conferences, but it has not been introduced yet.

The process for the globally-agreed target of "0.7% ODA/GNI" should be designed with the "backcasting" method that calculates backwards from the future. While the total amount of Japan's ODA remains stable, with the increase of loans, a clear vision of the path to achieve this global target is needed.

On emphasizing development assistance for Asia, the Japanese Government should promote aid collaborating with its neighboring countries. They should promote cooperation and harmonization in development assistance, not promote political tensions. Japan's ODA needs to include not only economic development, but also support for social development, democratization, peacebuilding, and civil society, as is currently provided by neighboring countries.

The Japanese Government should emphasize the role that can only be played by ODA, which is a public fund. In other words, it is not enough to invite the private sector or act as "seed money". Currently, there are no proper regulations on private funds, and there is always a possibility of stopping investment or withdrawing from areas where there is no profit. ODA, a public fund, should provide support to the vulnerable and the poorest people with "no one will be left behind" perspective.

3.1. Overall ODA volume

ODA targets

Japan's ODA expenditure should aim to reach the target of 0.7% of GNI set by the OECD Development Assistance Committee (DAC) without any compromise to quality. This

globally-shared goal is clearly mentioned in SDG Target 17.2 and Addis Ababa Action Agenda, but there is not positive response from MoFA of Japan.

3.4. Financing for sustainable development

Approach to financing sustainable development

As private investment tends to be concentrated on export-oriented industries with limited job creation, the benefit of economic growth is unlikely to ‘trickle down’ to the populations living in poverty. The combination of high-volume private sector investment and rapid economic growth makes it all the more important that Japan’s ODA, as a form of public development finance, serves public interests by addressing the failures and limitations of the market. More specifically, priority must be given to strengthening progressive national taxation systems, essential social services, and social protection systems.

4. Structure and systems

Few Japanese NGOs are invited to the Need Assessment and ODA Task Force by the Japanese Government. As a result, there is a possibility that the opinions from NGOs are no longer reflected. The ODA policies and plans should be formulated by multi-stakeholders.

As for the procurement guidelines, the Japanese Government has not yet followed the DAC's untied recommendation. Also, in 2002 (and revised in 2018), Japan introduced STEP loans (Special Terms for Economic Partnership) which are explicitly tied to the procurement of Japanese goods and services. STEP loans are more concessional than its untied ones, which could be an incentive for recipient countries to choose tied STEP loans rather than untied ones. See here for details:

https://www.jica.go.jp/english/our_work/types_of_assistance/oda_loans/standard/index.html

We think that Japan should be more careful to expand the STEP loans, which could act as one of the government/companies export strategies, which are contrary to the DAC policy to accelerate any efforts to untie aid to the maximum extent.

The human resource development has been strengthened by the Ministry of Foreign Affairs (MOFA) and JICA, but the “human resources exchange,” which is featured as a point in the “Medium-term Plan on Cooperation between NGOs and ODA: Five-year Direction for Cooperation” formulated by NGOs, MOFA and JICA in 2015, has been in slow progress. Short-term dispatch training in NGOs of MOFA and JICA staff has not been realized so far.

4.2. Systems

Policy/programme approval mechanism

Equitable and transparent governance of Japan’s ODA should be ensured. Its budget allocation by sectors and regions should be clearly disclosed to the public, and its development effectiveness should be improved.

5. Delivery modalities and partnerships

When it comes to country ownership, it is important to see if the voices of people living there and civil society are also reflected, not only the recipient government’s voice. If it is not reflected, the Japanese Government, which promotes democracy and inclusiveness as a core

value, should accelerate the inclusion of grass-roots voices.

In Japan's development assistance, policy planning (MoFA) and implementation (JICA) are extremely separated. JICA, as the implementing organization of ODA, must comply with the Ministry of Foreign Affairs' policy. Under these structures, we are concerned about the current situation in which JICA's knowledge and expertise in development and development cooperation cannot be properly utilized.

As for the Japanese Government's triangular cooperation, despite strong opposition from local farmers on at least one large-scale project, the dialogue has not been promoted. We are concerned that there are sabotages that divide civil society.

5.1. Effective partnerships

Accountability and transparency

Information disclosure, transparent decision making, and participation of people of beneficiary countries should be ensured when the policies of Japan's ODA – regardless of its terms, regional scopes, and thematic subjects – are formulated. The policies of Japan's ODA, from its highest level to lowest level, should be consistent throughout the process of planning, implementation, monitoring, and evaluation. The application of Guidelines for Confirmation of Environmental and Social Consideration should be further strengthened. Complaint mechanisms for the people of beneficiary countries who may suffer negative effects of Japan's ODA should be introduced and these cases should be treated fairly, appropriately, and quickly to rescue victims by suspending or reexamining projects. The budget allocation of Japan's ODA by geographies and thematic subjects should be disclosed from its planning stage to improve its transparency as well as strategic effectiveness.

6. Results management, evaluation and learning

According to 2018 Aid Transparency Index, the only independent measure of aid transparency among the world's major development agencies, organized by Publish What You Fund, overall results of JICA's score is 38.8%, which is categorized "poor", and Japan's MoFA scores 10.2%, which is "very poor". This shows that both agencies are failing to publish enough high-quality data across all indicators.

If the ODA implementation indicator is related to the SDGs indicator, the SDGs Implementation Guiding Principles, which are to be revised in December 2019, should also include an appropriate understanding of the global and local indicators of the SDGs.

Civil society's participation in the evaluation process is limited. To promote "implementation in society as a whole," civil society is ready to make further contributions.

7. Fragility, crises and humanitarian assistance

With regard to Rohingya refugees in Asia, the Japanese Government does not contribute enough to the realization of justice due to consideration for international political and economic relations, and its humanitarian aid is not sufficient.

In addition, Japanese Government does not actively accept refugees generally. If they are to promote human security, they should positively welcome refugees who come to Japan to escape from persecution and conflict.

As for Disaster Risk Reduction, as mentioned in the Sendai Framework for Disaster Risk Reduction 2015-2030, slow-onset disasters such as global warming and ground subsidence have

affected poor and vulnerable people. The humanitarian aid by ODA should also look at these disasters happening on a daily basis.

With regard to the cooperation between the Ministry of Foreign Affairs and JICA and the Ministry of Defense, Japanese civil society has various concerns about the dispatch of the Self-Defense Forces overseas.

7.1 Strategic framework

Contribution to global efforts

Full attention should be paid to trends in recipient countries' military expenditures, their development and production of weapons of mass destruction and missiles, their export and import of arms, etc., so as to maintain and strengthen international peace and stability, including the prevention of terrorism and the proliferation of weapons of mass destruction, and from the viewpoint that developing countries should place appropriate priorities in the allocation of their resources on their own economic and social development.

7.3 Effective delivery and partnerships

Coherence between peace, development co-operation and humanitarian assistance in crisis contexts

The principle of non-militarism should be maintained in the revised ODA Charter so that ODA and military activities are clearly separated. Any use of ODA for military purposes or for aggravation of international conflicts should be avoided.

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Select dimension(s) you want to comment, and delete others.

- 1.Global efforts for sustainable development
3.Financing for Development

Describe your comments.

1. Global efforts for sustainable development

The current policy framework of aid policy by the Government of Japan (GoJ) is the “Development Cooperation Charter.” The first framework was the “ODA Charter,” approved by the Cabinet in 1992, and once revised in 2003. The process for its second revision took place in 2014, and the new charter, with its new name was approved by the Cabinet in February 2015.

Several elements in the new Charter were welcomed by the CSO community: 1) “promoting women’s participation” as a main principle; 2) strengthening partnerships with CSOs as one of the “implementation arrangements;” 3) noting the internationally agreed 0.7% ODA/GNI target; and 4) emphasizing the importance of development education and public engagement.

However, there were also several concerns with the Charter. In short, CSOs’ concern is that according to the new Charter, ODA has been increasingly instrumentalized for GoJ’s security and commercial objectives. When the ODA Charter revision process began in March 2014, the Cabinet made it clear that the new Charter was to be closely related to the national security strategy (approved in December 2013) and the “Japan’s Revitalization Strategy” (Abe’s domestic economy strategy).

In the 2014 DAC Peer Review, it was recommended that “Japan should establish a prioritised agenda for ensuring domestic and foreign policy choices are informed by an assessment of development goals along with other goals. The planned revision of the ODA Charter could provide an opportunity to set this approach out clearly,” and that “Japan should use the updating of its ODA Charter to emphasise its focus on meeting international development effectiveness commitments.” CSOs consider that not only these recommendations were not met, but also went into the opposite direction.

1.1 Securitization of Aid

When the revision process started in March 2014, Vice Foreign Minister stated, “In order to promote such universal values as freedom, democracy and human rights, ODA will play a role in security-related fields.”

The new Charter explicitly states that the National Security Strategy is the basis for the new Charter. The Abe government made a shift away from the non-military principle of past versions of the ODA Charter. The 1992 and 2003 versions of the ODA Charter both emphasized that “any use of ODA for military purposes or for aggravation of international

conflicts should be avoided.” This was based on the peace principle of Japan’s Constitution. In contrast, the new Charter states:

Japan will avoid any use of development cooperation for military purposes or aggravation of international conflicts. In case the armed forces or the members of the armed forces in recipient countries are involved in non-military purposes such as public welfare or disaster-relief purposes, such cases will be considered on a case-by-case basis in light of their substantive relevance.

Despite the Vice Foreign Minister’s acknowledgement that aid would play a role in security-related fields, after debates, the final 2015 Charter only allows aid for armed forces or their personnel in cases of public welfare or disaster-response purposes. However, CSOs are concerned that there is potential for the government to expand the scope of its military-related aid. CSOs also fear that equipment provided for non-military purposes could be converted for military purposes in the future. In the past three years under the new Charter, there have been cases where ODA was provided for projects involving the armed forces or their members of the recipient countries. For the most part, these were projects related to disaster prevention although there have also been several big projects that support the marine coast guards in several Asian countries. To date, the principle of avoiding Japan’s aid being used for direct military purposes, or the aggravation of international conflicts, has been observed.

1.2 Commercialisation of Aid

The new Charter also has the potential to open ways whereby development cooperation is used as a mechanism for pursuing Japanese commercial interests. Among the Charter’s basic policies and principles, “dialogue and collaboration based on Japan’s experience and expertise” and “cooperation that takes advantage of Japan’s strength” were identified. The new Charter refers to the possibility that Japan would be “proactively presenting proposals while giving full consideration to policies, programs and institutions” of developing countries. These ideas could prove to be at odds with the ownership principles agreed in the series of discussions on aid and development effectiveness.

1.3 Growth-oriented View on Development

The new Charter has also been criticized for being too growth-oriented. While the 1992 and 2003 Charters both had poverty alleviation and growth as priorities, the new one puts forward “‘quality growth’ and poverty eradication through such growth.” The new Charter maintains that “quality growth” must be inclusive, sustainable and resilient, but these statements give the impression that the assumption is that growth is the priority and poverty reduction is the result of growth.

3.Financing for development (Aid Volume, Terms and Conditions and Aid Allocation)

3.1 Aid Volume

According to the DAC’s press release on 10 April 2019, Japan’s ODA in 2018, based on the new grant-equivalent terms statistics rule, was US\$14.17 billion and was 0.28% of Japan’s GNI. But in net-disbursement (traditionally the ODA amount), it was US\$10.06 billion, 0.23% of GNI and 13.4% decrease compared to 2017. Japan, because of its high proportion of loans

in its aid program, meaning that there has always been a big amount of repayment from the partner countries, “benefitted” from the change of the statistics rules that will not deduct repayment.

In the 2010 DAC Peer Review, it was recommended that “Japan should develop a roadmap to increase ODA to make progress towards meeting the 0.7% ODA/GNI target. Whether you take the 0.28% based on the new rule, or 0.23% based on the old rule, it is clear that Japan’s aid volume is far below the internationally agreed target of 0.7% of GNI. While the 0.7% target is mentioned in the Development Cooperation Charter, the Japanese government has not yet any roadmap or timeframe for its achievement. CSOs recommend that the Japanese government should develop a roadmap to increase its ODA to meet the internationally agreed target of 0.7% ODA/GNI ratio.

3.2 Terms and Conditions

3.2.1 Extremely Low Percentage of Grants

In 2016-2017 average, only 28.2% of Japan’s bilateral aid and 36.8% of total ODA was provided as grants. On average, 77.0% of DAC bilateral ODA and 81.4% of DAC total aid are provided as grants, Japan’s performance is extraordinarily bad, and is the worst among the DAC members. Thirteen DAC members provide 100% of bilateral aid in grants, nine more members over 90%. Japan should dramatically improve its share of grants in ODA.

3.2.2 Tied Aid

In the 2016-2017 average, 82.5% of Japan’s bilateral ODA was untied, 1.6% was partially tied, 4.4% was tied, and Japan didn’t report the tying status of 11.4% of bilateral ODA. There are also issues with how the Japanese government reports to the DAC on the tying status. According to the DAC Peer Review Report in 2010. Japan considers a project to be untied even if it requires the primary contractor to be Japanese. It justifies this on the grounds that the primary contractor is the project manager and is able to sub-contract freely. However, where primary contractors have to be Japanese and can act as both agents and suppliers of goods or services (including management) Japan should report such aid as tied.

As of yet, the Japanese government has not taken any measures to respond to this recommendation.

Another issue is the STEP Yen Loan scheme (Special Terms for Economic Partnership). Although the interest rate is much lower than for ordinary yen loans, it is tied to the procurement of Japanese goods and services. The 2010 DAC Peer Review Report raised concerns about STEP loans, saying that they “can act as an incentive for partner countries to choose tied conditions.” The Report recommended, “Japan should ensure that its untied loans are as favourable as its tied loans. Further roll out of the STEP scheme could also threaten the progress Japan has made in untying. If Japan is to untie further, it will need to phase out STEP loans.”

Another recent concern is that at the state-led initiative of the Export Strategy for Infrastructure Systems established by the Management Council for Infrastructure Strategy sets a governmental goal that Japanese companies should receive orders for infrastructure projects with a total value of approximately 30 trillion yen in 2020, and the government recommends to utilize ODA to achieve the goals.

In the 2014 Peer Review Report, the DAC recommended that “Japan should reverse the decline in the share of its aid that is untied.” Also in the report, the DAC was concerned that despite the 2010 recommendation, Japan still reports to the DAC aid as untied that must be procured through Japanese prime contractors.

CSOs recommend that the Japanese government should;

- reverse the decline of its aid that is untied
- fully implement the recommendations in the 2010 and 2014 Peer Review Reports regarding tied aid
- terminate all measures that would commercialize ODA for the benefit of Japanese corporations.

3.3 Aid Allocation

3.3.1 Geographical Allocation

While the DAC members in total allocated 34.8% of ODA to Sub-Saharan Africa, Japan allocated only 10.6% of its bilateral ODA to the region. Japan’s emphasis has always been in Asia, but compared to the past emphasis in East Asia, recently more aid (40.0% of bilateral aid) goes to South and Central Asian than to East Asia and the Pacific (30.7%). The 2014 Peer Review Report recommended that “Japan should continue to increase the share of ODA allocated to countries where assistance is most needed, including LDCs, bearing in mind international commitments.” CSOs are concerned that Japan has not increased its allocation of ODA to Sub-Saharan Africa and LDCs.

3.3.2 Sectoral Allocation

Sectorally, most DAC members emphasize aid for social development sectors such as health, education and population, as well as other social infrastructure, especially government and civil society. Japan’s emphasis has always been on economic infrastructure such as transportation, communication and energy. The share of aid for economic infrastructure has been increasing in the past few years. In late 2000’s and early 2010’s, it was around 40%, while in the last few years it has been around 50%. In 2016-2017, 49.0% of bilateral aid went to economic infrastructure, especially 38.6% to transport and energy, while allocating only 16.1% to social and administrative infrastructure. (DAC members in total allocated 17.1% to economic infrastructure and 34.1% to social and administrative infrastructure.) The trend of emphasis on economic infrastructure may be the result of the recent government’s emphasis on “‘quality growth’ and poverty eradication through such growth.”

CSOs recommend that the Japanese government should allocate more to social and administrative infrastructure, which is more directly related to poverty eradication and other internationally agreed goals in the Agenda 2030, and less to economic infrastructure.

(END)

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Select dimension(s) you want to comment, and delete others.

1. Global efforts for sustainable development

Describe your comments.

Japanese Government protect Human Rights in implementing ODA through the global supply chains based on the “Business and Human Rights” rules and the international human rights standards. “Business and Human Rights” is an important factor to be incorporated in ODA, because states and corporations are two major actors who could severely impact on people in implementing ODA in the days of the Sustainable Development Goals (SDGs).

Japan’s ODA has been historically focusing on infrastructure projects, and this year, 2019, Japanese Government was taking the lead to adopt the “G20 Principles for Quality Infrastructure Investment” in the G20 Summit.

According to the “Guiding Principles of Business and Human Rights” adopted in 2011, states must protect human right abuse and business sectors must respect human rights through the human rights due diligence. This requires governments and business sectors take appropriate steps to protect human rights including effective remedies. In the Principles, they do include “Integrating Social Consideration such as securing open access in a non-discriminatory manner, practices of inclusiveness, and equal opportunity to access jobs. But social aspects such as human rights related clauses in the Principles are very weak in terms of protecting people in the broad supply chains of the ODA projects, compared with the global trend such as PRI (Principles for Responsible Investment and Modern Slavery Act (UK).

One of the UN Business and Human Rights Working Group members, Ms. Anita Ramasastry clearly said in the Asahi News that National Action Plan of Business and human rights should include Japanese government’s responsibility to work on human rights protection in the ODA infrastructure projects, and in another words, for example, JICA should keep in mind to protect human rights including protecting workers’ rights in the infrastructure projects.

References (journals, books, websites etc.)

G20 Leaders’ Declaration: https://g20.org/en/documents/final_g20_osaka_leaders_declaration.html
G20 Principles for Quality Infrastructure Investment: https://g20.org/pdf/documents/en/annex_01.pdf
Guiding Principles on Business and Human Rights:
https://www.ohchr.org/documents/publications/GuidingprinciplesBusinessshr_eN.pdf

(END)

Name	Yuki Tanabe
Organization	Japan Center for a Sustainable Environment and Society (JACSES), in cooperation with Friends of the Earth Japan, Kiko Network, Mekong Watch and Greenpeace Japan
Title	Program Director, Sustainable Development and Aid (SDAP)

Select dimension(s) you want to comment, and delete others.

1. Global efforts for sustainable development

Describe your comments.

1. Inconsistency with the Paris Agreement

According to the component 1.2 Policy Coherence for Sustainable Development, DAC Peer Review Reference Guide, government policies must be consistent with international commitments and endorsed at the highest political level.

The Government of Japan ratified the Paris Agreement in November 2016. On June 11, 2019, the Government adopted a Long-term Strategy (LTS) under the Paris Agreement, and committed to "promote energy infrastructure overseas, which are in line with the long-term goal of the Paris Agreement, and reduce CO2 emissions globally." *1

However, the Government of Japan is still providing its ODA loans for new coal-fired power plants in developing countries. On July 1, 2019, it approved the Japan International Cooperation Agency (JICA)'s 5th tranche of ODA loan for Matarbari Ultra Super Critical Coal-Fired Power Project in Bangladesh. *2 Also, it is expected that an ODA loan for the construction of Indramayu Coal-Fired Power Plant Project in Indonesia would be considered by the Government of Japan after the completion of detailed design stage, for which JICA is currently disbursing its Engineering Service (E/S) loan. *3

Therefore, the Government of Japan should bridge the gap between the international commitment and the actual implementation of ODA, and end ODA loan for any coal project in order to achieve compliance with the Paris Agreement.

2. Inconsistency with the environmental regulations of Japanese Government

According to the component 1.1 Efforts to support global sustainable development, DAC Peer Review Reference Guide, government policies must be consistent with; 1) Climate, environment and resilience, 2) Access to global technology and knowledge and 3) Global health.

The Government of Japan is strictly regulating the air pollution emissions from the coal power plants based on the Air Pollution Control Law, especially on the List of emission standard values of dust and NOx, and of Sulfur oxides (SOx) regulations set by Japan Ministry of the Environment. *4,5

Furthermore, current emission limits on the newly built coal power plants are applying more stringent emission limits than the government's baseline regulations to fulfill the demands of the people and local government for clean air and pollution reductions.

(The median emission limits of 26 coal power units which are $\geq 200\text{MW}$ that have been proposed or have started construction and operation in Japan since 2012 are 54 mg/Nm^3 for nitrogen oxides (NO_x), 38 mg/Nm^3 for sulfur dioxide (SO_2) and 5 mg/Nm^3 for dust *6)

In contrast to this, Japanese ODA bodies financed coal power plants overseas even though the coal plants overseas are applying significantly weaker air pollution emission limits than domestic coal plants. For example, Matarbari Ultra Super Critical Coal-Fired Power Project in Bangladesh, Indramayu Coal-Fired Power Plant Project in Indonesia are applying maximum 30 times poor air pollution emission limits.

Table 1. Emission limit on coal power plants: Japan domestic vs recipient countries

Country	Project name	Emission limit (mg/Nm^3)			Boiler efficiency
		NO_x	SO_2	Dust	
Japan	Japan median limit since 2012	54	38	5	USC
Bangladesh	Matarbari Coal-Fired Power Generation Hub	600	850	150	USC
Indonesia	Indramayu Coal-Fired Power Plant Project Unit 4	550*	550*	100*	SC

- All data is extracted from the relevant project EIAs

- USC (Ultra-supercritical) / SC (Supercritical) / SUBC (Subcritical)

* Emission limits for Indramayu CFPP are not available in the EIAs, so figures are based on the newly enacted (23 April 2019) emission standards for coal power plants in Indonesia, which specify limits of 550 each (for NO_x and SO_2) and 100 (dust) or plants operating or constructed before the regulation was enacted.

From this gap on the emission limits, those two coal plants are expected to impact significantly on the air quality (Chart) and cause 34,620 more premature death over its 30 years operating lifetimes which can be avoided if the emission limits for Japanese coal plants are applied. This death toll is 4,100 when the emission limits on coal plants in Japan are applied*7.

Table 2: Modelled number of total premature deaths due to excess pollution per Japanese ODA aid power plant for Scenario (with 95% confidence intervals)

Unit	Scenario 1 (Local Limits)			Scenario 2 (Japanese Limits)			Difference		
	Central	Low	High	Central	Low	High	Central	Low	High
Matarbari 1	506	261	751	73	36	109	433	224	642
Indramayu-4	785	413	1,158	64	33	94	721	380	1,063

The current Japanese government aids on coal power plants overseas are functioning in giving allowance on exporting pollution. This can be reduced or totally avoided when the ODA bodies have certain criteria for regulating aids on the facilities which have poorer environmental regulations than the facilities in Japan domestic.

As one of the economic and technological leaders in the world, Japan has a responsibility to take action on protecting public health and the local environment on the Japanese aided coal plants by ending the aids or shift the aids to renewable energy in the hosting countries as the government is doing in Japan.

Therefore, the Government of Japan should bridge the gap between the domestic standards and the actual implementation standard of ODA, and end ODA loan for the coal power plants which are having poor environmental regulations overseas.

Our suggestion is; 1) Shift the future aids to renewable energy projects, for global clean air and safe climate, not coal power plant projects and 2) Revise the criteria for future aids: banning the overseas aids for the facilities with poorer environmental regulations than Japanese domestic environmental regulations to achieve 1) Climate, environment and resilience, 2) Access to global technology and knowledge, and 3) Global health.

This can improve Japanese aids towards the virtuous cycle, also will take further up Japan's leadership as a global aider for developing countries.

3. Inconsistency with the international human rights standards

According to the component 1.2 Policy Coherence for Sustainable Development, DAC Peer Review Reference Guide, government policies must be consistent with international commitments and endorsed at the highest political level.

The Government of Japan ratified the International Covenants on Human Rights (both the International Covenant on Economic, Social and Cultural Right and the International Covenant on Civil and Political Rights) on June 21, 1979.

In the Cabinet Decision on the Development Cooperation Charter on February 10, 2015, the Government committed to "pay adequate attention to the situation in the recipient countries regarding the process of democratization, the rule of law and the protection of basic human rights" as "Principles for securing the appropriateness of development cooperation." *8

In addition, JICA committed to “respect(s) the principles of internationally established human rights standards such as the International Convention on Human Rights, and gives special attention to the human rights of vulnerable social groups including women, indigenous peoples, persons with disabilities, and minorities when implementing cooperation projects” in its Guidelines for Environmental and Social Considerations (April 2010). *9

However, the Government of Japan is still providing its ODA loans for the project where local residents are unable to freely raise their concerns and opinions: that is, where basic human rights, such as freedom of expression, are not secured. In Indramayu Coal-Fired Power Plant Project in Indonesia, three local residents who are opposing the project were criminalized, detained, and convicted with 5 to 6 months in jail since September 2018 due to the false charge of “insulting national flag.” Even after this human rights abuse, JICA is continuously disbursing its E/S loan for the detailed design of the project, claiming that, in the case of E/S loan, its Guidelines allow JICA to confirm the “fulfillment of necessary environmental and social considerations” “at the time of the environmental review of the proceeding phases of the project.”

Therefore, the Government of Japan should bridge the gap between the international commitment and the actual implementation of ODA, and end ODA loan for any project which fails to achieve compliance with the International Covenants on Human Rights. JICA should also revise its Guidelines to bridge the gap between international commitment and the actual implementation of ODA even in the case of E/S loan.

References (journals, books, websites etc,)

- (1) Japan's Long-term Strategy (LTS) under the Paris Agreement
<https://www.env.go.jp/en/headline/2406.html>
- (2) Signing of Japanese ODA Loan Agreement with Bangladesh: Contributing to economic revitalization by responding to rapidly increasing electricity demand
https://www.jica.go.jp/english/news/press/2019/20190701_31_en.html
- (3) Signing of Japanese ODA Loan Agreements with the Republic of Indonesia - Meeting the Rapidly Growing Power Demand with Ultra Super Critical Coal-Fired and Geothermal Power Plants
https://www.jica.go.jp/english/news/press/2012/130328_02.html
- (4) Japan Ministry of the Environment. *List of emission standard values of dust and NO_x*
www.env.go.jp/air/osen/law/t-kise-6.html
- (5) Japan Ministry of the Environment. *Sulfur oxide (SO_x) regulations*
<https://www.env.go.jp/air/osen/law/t-kise-1.html>
- (6) Kiko Network. *Japan Coal Plant Tracker* sekitan.jp/plant-map/en/v2/table_en (accessed on 15 July 2019)
- (7) Greenpeace Japan, Greenpeace Southeast Asia. *A Deadly Double Standard: Japan's Financing of Highly Polluting Overseas Coal Plants Endangers Public Health*
<https://storage.googleapis.com/planet4-southeastasia-stateless/2019/08/a2301647-double-standard-japan-full-report.pdf>
- (8) Japan Ministry of Foreign Affairs. *Cabinet decision on the Development Cooperation Charter*
<https://www.mofa.go.jp/files/000067701.pdf>
- (9) Japan International Cooperation Agency (JICA). *Guidelines for Environmental and Social Considerations*
https://www.jica.go.jp/english/our_work/social_environmental/guideline/pdf/guideline100326.pdf

(END)

Name	Naoko Shiroya
Organization	Japan NGO Network for Education (JNNE)
Title	Vice Representative

Select dimension(s) you want to comment, and delete others.

3. Financing for development

Describe your comments.

On 3, we welcome GoJ announced commitment to providing US\$200 million in three years to support the education of girls and women in developing countries at G7 summit in Canada, 2018. However, this is not additional to current aid to education, and Japan's aid amount to basic education is very low. The percentage of Japanese Official Development Assistance (ODA) allocated for primary and secondary education is only 2.2 per cent, while other DAC member nations allocate 5.4 per cent of their aids to basic education. This is due to the fact that Japanese ODA prioritizes economic infrastructure with allocating 40% of aid. The amount of contribution of the Japanese government to the Global Partnership for Education (GPE), a multilateral aid agencies for basic education, ranks 17th out of 22 nations, with only 0.53 per cent share in all donors' contributions to GPE. Japan has not made any contribution to Education Cannot Wait (ECW) fund, a multilateral agency to fund education in emergencies. Finally, the programme to promote the Japanese-style education model to be implemented outside Japan is donor-driven. It ignores the ownership of governments and is not aligned with the national education policy. Japan should increase its allocation to basic education to the level of other DAC members, contribute more to GPE and to start supporting ECW.

References (journals, books, websites etc.)

- Civil Society Spotlight Report on the SDG 4 Implementation Status in Japan, Japan NGO Network for Education and ASPBAE, Sep. 2019
http://jinne.org/doc/JAPAN_SpotlightReportonSDG_4,2019.pdf
- DAC Creditor reporting system (accessed in Feb 2019)

(END)

Name	Yumiko Horie, Yoko Ono
Organization	Save the Children Japan
Title	Advocacy Manager, Advocacy Specialist

Select dimension(s) you want to comment, and delete others.

1. Global efforts for sustainable development
2. Policy vision and framework
3. Financing for development

Describe your comments.

1. Global efforts for sustainable development and 2. Policy vision and framework

- ✓ While we fully recognize and appreciate the MoFA's efforts to set up a high-level, cross-ministerial SDGs HQ within the government and to introduce a multi-stakeholder process in implementing SDGs in Japan, it is unclear how SDGs implementation under the SDGs Action Plans is coherent with sustainable development/2030 Agenda, and measures such as data-based and evidence-based gap analysis, addressing inequality/LNOB, back-casting planning and prioritized budget allocations, etc. should be incorporated.
- ✓ We appreciate that Japan has set Human Security and SDGs as one of the pillars in the "FY2019 Priority for Development Cooperation". However, we recommend that the Japanese government should place Human Security and SDGs as a solid foundation and a cross-cutting theme for all pillars, and prioritize global public goods/challenges and interests of those furthest behind in developing countries.
- ✓ The SDGs Action Plans and the Priority of Development Cooperation seem to fail to set out a clear approach to prioritize poverty reduction and LNOB. Again, we recommend that Japan should prioritize and have clear policies to protect the rights of the poorest, most vulnerable and furthest behind with funding for social sectors such as universal health coverage, quality education, and universal social protection (please refer to the following section on bilateral ODA allocation).

3. Financing for development

- ✓ We recognize and appreciate that Japan has re-committed to the 0.7% target. We recommend that the government should set out a clearly defined plan and timeline to meet the target.
- ✓ The percentage of Yen loans are still high, that made Japan's ODA amount look higher by changing the calculation method from net to grant equivalent to improve its appearance. We strongly advocate to increase grant ODA which can be used for social infrastructure (education, health system, nutrition, etc.), multi-/cross-cutting issues (refugee, gender, etc.) and humanitarian assistance.
- ✓ Bilateral ODA is still disproportionately allocated to Asian countries; 77.3% of ODA to South-West and East Asia in FY2019 (tentative disbursement data from FY2019 Priority for Development Cooperation). We recommend that Japan's ODA should be targeted more effectively for countries that have limited access to other sources, particularly least developed countries (LDCs) and conflict-affected and fragile states (CAFS).
- ✓ Sectoral allocation of bilateral ODA is also disproportionately high towards economic infrastructure at 51%, comparing with only 17% for social infrastructure in 2016 (from ODA

white paper 2017, https://www.mofa.go.jp/policy/oda/page22e_000864.html). We think it is urgently needed to increase ODA for social infrastructure, cross-cutting issues and humanitarian aids in order to reach the furthest behind.

- ✓ As a pathfinding-country of GPeVAC (Global Partnership to End Violence against Children), we recommend that Japan should increase investments in ending violence against children and be a leader to change the current situation where only less than 0.6% of total DAC countries' ODA was allocated to ending violence against children in 2015. (https://www.childfund.or.jp/files/Counting_Pennies_Executive_Summary.pdf).
- ✓ We appreciate the government's efforts to leverage funds from private actors and to develop the National Action Plan for Business and Human Rights. In order to promote development finance other than private funds, we recommend that the Japanese government should put more focus and work on supporting developing countries to strengthen domestic resource mobilization, improving international tax systems, and supporting developing countries' effort to incorporate a new "social compact" featuring a commitment to social protection, including floors, as the Addis Ababa Action Agenda (AAAA) states.

References (journals, books, websites etc.)

FY2019 Priority for Development Cooperation:

<https://www.mofa.go.jp/mofaj/gaiko/oda/files/000491566.pdf> (Japanese only)

*Attached a translation of the summary (Page 1) by civil society for your reference.

Public Survey on Japan's diplomacy

https://www.mofa.go.jp/press/release/press4e_002430.html

The Japanese public thinks that Japan's ODA should be used for social infrastructure rather than economic infrastructure/Japan's business interests. When asked Q8 "What areas should be given particular priority in Japan's development assistance efforts?", the most popular response, accounting for 61.0% of the total was "assistance to realize a better society, including education, health and sanitation," which was followed by "assistance for saving lives, including food aid, recovery from natural disasters and disaster risk reduction" at 54.2%, compared with "supports for industrial development" at 24.4%. When asked (Q9) on the major global challenges that Japan needs to prioritize under SDGs, the most popular response, accounting for 44.8% of the total was "education," followed by "marine plastic litter" at 40.5%. With TICAD 7 in Yokohama, when asked (Q10) what particular areas Japan should concentrate on in its diplomacy with Africa, the most popular response, accounting for 53.3% of the total was "contribution to peace and stability," followed by "cooperation for poverty eradication" at 50.5%, however, only 27.8% chose "promotion of Japanese companies' investments and business".

(END)

Name	Naoko Shiroya
Organization	Plan International Japan
Title	Advocacy Team Leader

Select dimension(s) you want to comment, and delete others.

1. Global efforts for sustainable development
3. Financing for development

Describe your comments.

Education

In March 2019, the Ministry of Foreign Affairs conducted a domestic public opinion survey on Japan's diplomacy. This survey was conducted by telephone, and 1,000 people at the age of 18 or over in Japan's 47 prefectures answered the survey. When asked about the major global challenges that Japan needs to prioritize under the Sustainable Development Goals (SDGs), the most popular response was "education" (44.8%). Plan International Japan and Japan NGO Network for Education (JNNE) have been organizing campaign on Education since 2008, many schools and citizens joined the campaign and we contributed to promote awareness raising on Education. Japanese CSO would like Government of Japan to increase ODA on education especially for most marginalized children.

Gender Equality and Women's empowerment

According to "Aid in Support of Gender Equality and Women's Empowerment DONOR CHARTS", Percentage of Japanese Government's ODA focused on gender equality in Bilateral Allocable Aid 2016-2017 is 34%, which is below the DAC average (38%). Government of Japan set "Development Strategy for Gender Equality and Women's Empowerment" in May, 2016. It highlights gender equality and women's empowerment is significant in all development fields. Priority Initiatives are Promotion of Women's and Girls' Rights, Building the Capacity of Women and Girls to Reach their Full Potential and Advancement of Women's Leadership in Politics, Economy and Other Public Fields. We request Government of Japan to increase percentage of ODA focused on gender equality and keep on promoting Gender Equality and Women's Empowerment in cooperation with Japanese NGO.

References (journals, books, websites etc,)

Aid in Support of Gender Equality and Women's Empowerment DONOR CHARTS
<https://www.oecd.org/dac/financing-sustainable-development/development-finance-topics/Aid-to-gender-equality-donor-charts-2019.pdf>

(END)

Name	Eno Nakamura
Organization	Development Education Association and Resource Center (DEAR)
Title	Secretary General

Select dimension(s) you want to comment, and delete others.

6. Results management, evaluation and learning

Describe your comments.

On 6.3, we welcome that the sentence “Promoting development education” has been written in the Development Cooperation Charter in 2015. It is also worth mentioning that Education for sustainable development (ESD) has been included in the National Curriculum Standard which will be implemented from 2020.

However, more effort is needed to improve communications to enhance domestic development awareness and engagement.

Although GoJ has implemented activities to promote understanding and support for ODA and international cooperation as TV programs, SNS, web games, animations, audience of these program is quite limited and they don't reach people who are not interested in ODA and international cooperation.

In order to raise people's interest and awareness about global issues, GoJ has to promote more development education and ESD not public relations. Through development education, people will understand global issues and challenges facing the world and will participate in actions to address these challenges. GoJ has to use domestic PR budget more for development education and ESD.

To outreach more people including school children all over Japan, GoJ has to support NGOs and NPOs that promote development education and campaign for SDGs.

References (journals, books, websites etc,)

Development Cooperation Charter,
<https://www.mofa.go.jp/mofaj/gaiko/oda/files/000067701.pdf> (accessed in Nov 2019)

(END)

Name	Yuko Shibata
Organization	Japan Platform
Title	General Manager, Emergency Response Unit

Select dimension(s) you want to comment, and delete others.

7. Fragility, crises and humanitarian assistance

Describe your comments.

Japan Platform (JPF) is an international emergency humanitarian aid organization which offers the most effective and prompt emergency aid in response to global developments, focusing on issues of refugees and natural disasters. JPF conducts such aid through a tripartite cooperation system where NGOs, business communities, and the government of Japan work in close cooperation, based on equal partnership, and making the most of the respective sectors' characteristics and resources.

Limited access to Humanitarian budget for NGOs

Japan has two Humanitarian budget sources, 1) contributions to international organizations and 2) Emergency Grant Aid, however, NGOs have access to neither ones. So we have limited amount of budgets which Japan Platform has. Considering the current humanitarian situation, this system needs to be improved for flexible humanitarian funding.

Lack of Commitment for Grand Bargain, especially increase of use and coordination of cash-based programming

The importance of cash-based programming is not recognized, and the cash-based assistance requires longer process of approval in most of cases which discourage the use of cash-based programming.

More support and funding tools to local and national responders

We do not see the improvement of localization. More funding tools and channels to local and national responders should be considered. It is also important to commit to Country Based Pooled Fund as well as CERF.

Increase collaborative humanitarian multi-year planning and funding

Considering the fact that we deals with more longer protracted humanitarian crisis, the multi-year panning and funding should be seriously considered. It should be applied both for multi-lateral funding and also for NGOs.

More investment for DRR and resilience in humanitarian phase

Humanitarian fund is now only targeting to responding the crisis, however, it should also cover increasing resilience activities through prevention in the humanitarian phase.

References (journals, books, websites etc,)

(END)