



Title: Progress Report on the Implementation of Recommendations
Regarding the Thematic ...

PC 90/3 b)



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Progress Report on the Implementation of Recommendations Regarding the Thematic Evaluation of Strategy A.3

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1. As requested by the Members of the Programme Committee in September 2002 during their discussion related to the Thematic Evaluation of Strategic Objective A3 *Preparedness for, and effective and sustainable response to, food and agricultural emergencies*, this paper presents the main actions taken and the results achieved in the implementation of the recommendations of the evaluation.

I. Background

2. During the first semester of 2002, FAO led its first evaluation specifically focused on one of the twelve strategic objectives approved by the 30th Session of the FAO Conference held in November 1999. Strategic Objective A3 was a good choice for the first such exercise. Emergency-related work has been undertaken by FAO for a long time and many of the tasks performed have not been fundamentally altered. At

the same time, the magnitude of FAO's work in agricultural relief has significantly increased over the past ten years. It was thus timely to examine FAO's work in emergency relief as well as the whole of the Organization's work on the disaster cycle through an in-depth evaluation.

3. The evaluation covered both Regular Programme and Field Programme activities under Strategic Objective A3. As a formative evaluation, it examined whether FAO's interventions were adequate to achieve the expected results in terms of the Strategic Objective, assessed the strengths and weaknesses of activities under the Objective's four components and made recommendations to improve the design, implementation, results and follow-up of those activities in the future. The evaluation specifically included a review of the emergency-related activities under the Technical Cooperation Programme (TCP). Indeed, the TCP was a major source of funding and this evaluation was combined with a thematic review of TCP projects on this subject. The evaluation covered emergency-related work that took place during the period 1996 to 2001.

4. The aim of the evaluation was to identify FAO's strengths and weaknesses in this area and to assess:

1. The extent to which the Organization's emergency-related work corresponded to the thrust of Strategic Objective A3;
2. the relevance of emergency-related work to Member Nations;
3. the responsiveness and efficiency of FAO's institutional capacity to provide emergency assistance;
4. the quality of emergency-related work;
5. the effectiveness and impact of the work.

5. In July 2002, the Evaluation Service finalized its evaluation and made a series of recommendations which were reviewed by a Peer Committee and shared with Management. In September 2002, the Programme Committee reviewed the report (PC 88/5a). The Committee's report states that *"The Committee welcomed the evaluation's comprehensive approach to the strategy through a systematic review of normative activities and an assessment of a balanced sample of relief and rehabilitation operations in the field. (...) The Committee endorsed the recommendations in general, although many members felt that given their large number, a clear indication of relative priority between them would have been useful, as suggested by the external review panel. (...) It thus urged the Secretariat to effectively follow up the evaluation recommendations and requested a progress report, in one year's time, on the status of actions taken in their implementation."* In November 2002 the report of the FAO Council stated *"The Council noted that the Programme Committee had also considered an evaluation of FAO's work under Strategy A3 related to preparedness and response to food and agricultural emergencies, recognizing that this was the first case of an evaluation specifically focused on a Strategic Objective of the Organization."*

II. The Report's Main Recommendations

6. The Evaluation report recommended that in future FAO should:

1. **mainstream emergency work (Recommendations 1 and 2), including through:**

1. programming specific emergency-related outputs in the Programme of Work and Budget;
 2. functional statements of the technical units reflecting roles in emergencies;
 3. promotion of disaster management in agricultural development activities in natural disaster-prone countries.
- 2. strengthen preparedness for disaster (Recommendations 3 and 4) through:**
1. development of an FAO strategy and priority actions for preparedness;
 2. development of a practical manual for conducting crop and food supply assessment;
 3. in post-conflict situations, or where government institutions have collapsed, provision of training in the regular collection and analysis of information;
 4. development of a consolidated database to facilitate disaster impact and needs assessment;
 5. greater attention to food insecurity and vulnerability.
- 3. enhance agricultural relief operations (Recommendations 5,6,7,8,9,10 and 11) by:**
1. reviewing the procurement processes, with a view to decentralizing the procurement of inputs and raising FAOR procurement limits where appropriate;
 2. appointing Emergency Coordinators;
 3. paying more explicit attention to: cropping calendars, beneficiary selection and capacity, alternative approaches for input distribution, technical support and evaluation;
 4. avoiding combination of relief and rehabilitation components in small emergency projects.
- 4. conduct an evaluation of the Oil-for-Food Programme in 2003-2004 (Recommendation 12);**
- 5. ensure the link from relief to rehabilitation and development (Recommendations 13 and 14);**
- 6. further develop collaboration with partners (Recommendation 15);**
- 7. establish adequate funding mechanisms to respond to and mitigate the effects of emergencies (Recommendations 16, 17 and 18).**

III. Actions Taken by FAO

7. Based on the discussions held during the Programme Committee session in September 2002, a plan of action was developed under the auspices of the Emergency Coordination Group (ECG) to respond to the recommendations of the Thematic Evaluation. In February 2003, the ECG examined a mid-term review which highlighted the activities carried out to that date in response to specific recommendations and other activities which also contributed to the implementation of the recommendations. The ECG endorsed the results achieved and agreed on the next steps proposed for further implementation of the recommendations.

8. The present document was prepared in June 2003 and includes the actions already taken or underway. The status of implementation of specific recommendations is included in a Matrix as Annex 1.

PREPARATION OF A STRATEGIC FRAMEWORK FOR

THE PAIA REHAB

9. The ECG is an interdepartmental forum which serves as an internal coordination mechanism for promoting a coordinated response by the Organization to major emergencies. It also acts as a management mechanism for the Priority Area for Inter-disciplinary Action (PAIA) on Disaster Prevention, Mitigation and Preparedness and Post-Emergency Relief and Rehabilitation (PAIA Rehab) which is intended to enhance multidisciplinary approaches to the implementation of the Organization's Strategic Objective A3.

10. In June 2002, the ECG decided to review the PAIA Rehab framework with a view to ensuring that the technical divisions would effectively incorporate the PAIA Rehab objectives and priorities into their PWB 2004-2005. A working group was therefore established that (i) developed a strategic framework for the PAIA Rehab, (ii) identified four concrete interdisciplinary outputs to be delivered by the PAIA Rehab during the 2004-2005 period that would reflect strategic priorities for the Organization and (iii) proposed an approach to identify Regular Programme activities that would benefit from inter-disciplinary work and contribute to the four selected PAIA Rehab outputs for 2004-2005. The results of this group were presented to the ECG during a meeting held in November 2002 and were consequently endorsed.

11. The strategic framework for the PAIA Rehab is based on a management structure and a planning tool. The planning tool provides a simple overview of the balance of activities in relation to both PAIA Rehab long-term goals:

1. strengthening disaster preparedness;
2. improving the effectiveness of relief and rehabilitation interventions; and
3. fostering disaster prevention and mitigation;

and the Medium-Term Plan (MTP) process objectives:

1. developing FAO's capability as information source on PAIA themes;
2. increasing FAO's effectiveness in emergency, preparedness and response in the field; and
3. increasing synergies between FAO's normative work and its operational activities on PAIA themes.

This planning tool will be used to identify synergies between divisional outputs and to filter and balance proposals for outputs to be delivered by PAIA Rehab in future biennia.

12. The management structure is composed of three technical groups, one for each of the long-term goals of the PAIA Rehab. These groups are composed of chairpersons designated by the ECG for a biennium period, by biennium PAIA Rehab output coordinators and by staff of units that have an interest in the corresponding goal. Chairpersons, together with biennial output coordinators, constitute a PAIA Rehab Strategic Advisory Group. Terms of Reference for these groups have been prepared.

13. The proposed PAIA Rehab work plan for the 2004-2005 period builds on work carried out in the current biennium to look at:

1. Disaster Information System;
2. Tools and Guide on Learning to Live with Drought;

3. Improved Programme Framework and Project Design and Enhanced Budget Mechanisms to Ensure Adequate Funding of Technical Support; and
4. Enhancing the Upstream-downstream Linkages in the Management of Natural Resources.

14. Since the endorsement of the strategic framework and the work plan by the ECG members, efforts have been concentrated on the programming exercise for 2004-2005. As a result, the technical divisions have clearly identified specific biennial outputs related to prevention, preparedness, and response to emergency situations. Additional efforts will now be required to ensure a smooth delivery of PAIA Rehab outputs for 2004-2005. The Strategic Advisory Group proved to be very useful to the ECG Secretariat in facilitating inter-disciplinary work and promoting the implementation of a PAIA Rehab work plan. The ECG will review in early 2004 the functioning of this strategic framework.

PREPARATION OF A CONCEPT NOTE ON “THE IMPACT OF DISASTER ON LONG-TERM FOOD SECURITY AND POVERTY ALLEVIATION – POLICY IMPLICATIONS”

15. A paper on "The impact of disaster on long-term food security and poverty alleviation - policy implications" was prepared for presentation and discussion at the Committee on Food Security (CFS) at its May 2003 session.

16. This paper identifies disaster reduction measures aimed at avoiding a deteriorating trend in poverty and long-term food security induced by disasters, based on a review of few country experiences such as Bangladesh, Ethiopia, small islands of the Eastern Caribbean, Uganda and Southern Africa. It provides a general framework for incorporating disaster management into development policies and programmes.

17. The CFS acknowledged and welcomed this presentation and requested that it be regularly informed of FAO's activities related to emergencies. It also made specific recommendations for FAO which are fully in line with those of the evaluation report: (i) to continue to support and strengthen early warning, risk assessment and preparedness programmes for member countries; (ii) to ensure, in close partnership with UN and other agencies, utmost coordination in its emergency relief and rehabilitation programmes with an emphasis on disaster management that is development oriented; and (iii) to promote and integrate holistic disaster management strategies at the national and international levels, that combine long-term development planning with short-term action.

18. The ECG is exploring ways in which it can assist the CFS Secretariat on this matter.

PREPARATION OF A DISASTER INFORMATION SYSTEM

19. One of the recommendations of the PBEE evaluation report was already in the process of being implemented through a PAIA Rehab output entitled: "FAO Disaster Management Database". The aim of this output is to consolidate the rich existing information available in FAO into a single database that would include information

on food security, population, natural resources, disaster impacts, etc.

20. The PAIA Rehab has made an inventory of the existing spatial and non-spatial information in FAO which could be used in the context of emergency interventions. This inventory contains baseline data providing both information for early warning/early assessment and for early planning of emergency interventions. Data include indicators on physical characteristics of areas of interest, status and trends of development, potential or existing crises and physical and socio-economic parameters.

21. This inventory is being used to identify relevant information for inclusion in an information system to be developed at a later stage. This system would be used primarily by FAO staff involved in emergency operations at Headquarters and in the field, and should facilitate the assessment of impact of and needs in future disasters. To ensure that the system is user-oriented, a consultation with Operations Officers took place in May 2003 and resulted in a preliminary definition of the main capabilities of an information system. This definition needs to be fine-tuned first within the Emergency Operations and Rehabilitation Division and then with technical officers from other units in order to take into account technical concerns when designing the system.

ENHANCING FAO EMERGENCY NEEDS ASSESSMENT FRAMEWORK

22. In order to pursue and strengthen its work on information for early warning, FAO reviewed the objectives and purposes of the joint FAO/WFP Crop and Food Supply Assessment Missions (CFSAMs), which assess the impact of natural and/or man-made disasters in order to determine the country's food import requirements and food aid needs until the next harvest. A similar exercise was led by WFP. A further in-depth Expert Consultation Workshop has been planned for late 2003 sponsored by the EU and USAID and involving other partners and stakeholders. The workshop will review the joint CFSAM methodology to address emerging issues such as an extension from cereal balance sheets to food balance sheets, improvements in import requirement calculations, cross-border trade, estimation of chronic versus emergency-related vulnerable populations, etc. A practical handbook for field staff and consultants conducting CFSAM will be prepared after this consultation.

23. In the meantime, FAO has developed a Needs Assessment Guide for Emergency aiming at quickly assessing the impact of a natural or human-made disaster and identifying the needs of the affected population. A PAIA Rehab working group reviewed materials available within the Organization and identified the requirements for developing a corporate instrument. Based on this, a practical tool promoting a consistent assessment process was elaborated. The guide contains a general section that explains the methodological and practical approach to the needs assessments. A second section provides methodological steps and key questions for analysing the disaster affected livelihood(s) and for identifying sectors in which a response is needed. These questions are linked to technical modules that provide further guidance on specific sectors. These technical modules are currently under development, the ones on "Pest Management" and "Seeds" being at a well advanced stage.

24. These tools provide FAO with the required assessments to better prepare adapted response strategies to emergency situations and design high quality projects.

REVIEW OF APPROACHES TO LINK RELIEF TO REHABILITATION AND DEVELOPMENT

25. FAO has multiplied its initiatives aiming at clearly defining approaches that promote the link from relief to rehabilitation and development. On the conceptual side, FAO has explored potential alternatives to current interventions in different areas. For example, in the seeds sector, new approaches such as seed fairs and seed vouchers have been explored in agricultural emergency operations as an alternative to direct seed distribution. As a result of an extensive internal and external consultation process, “Guiding Principles for Seed Relief” have been elaborated, discussed during a three-day workshop and endorsed by the ECG. Similar initiatives are currently underway in the livestock sector. In addition, different documents have been prepared with the aim of identifying new opportunities for FAO’s emergency operations such as a review of social safety-net mechanisms and a concept paper for operationalizing HIV/AIDS mitigation activities.

26. Regarding its field activities, FAO is currently conducting two major evaluations in Afghanistan and Southern Africa focusing, in particular, on FAO’s role in linking relief to rehabilitation. In Afghanistan, one of the objectives of the mid-term review is to assess to what extent FAO has been able to develop synergies between its emergency programme and its long-term development assistance (e.g. seeds multiplication programme providing inputs for emergency distribution). In Southern Africa, most agencies are now looking beyond emergency interventions to alternatives that protect and develop livelihoods. FAO’s evaluation is assessing, in particular, whether the parallel tracks of emergency and development assistance in the agricultural and other rural sectors can be effective in providing an adapted support to the affected populations. Lessons drawn from these two major evaluations will be useful for guiding FAO’s future field assistance strategies in other complex emergencies.

27. These approaches and lessons learnt are being further explored in Sudan and Sri Lanka. In Sudan, the preparation of FAO’s contribution to the Contingency Plan for Peace prepared by the UN has been elaborated through an integrated approach within the Organization and with external partners with view to better assessing the needs of the country and propose innovative and adequate responses. In Sri Lanka, a needs assessment and strategy has been prepared for recovery of agricultural and fisheries-based livelihoods: the approach integrates safety nets with development by, for instance, providing cash for work on infrastructure rehabilitation. Complementary work to improve household food security, nutrition and livelihoods is also being undertaken in Sri Lanka through close collaboration between Headquarters and the Regional Office for Asia and the Pacific.

PARTNERSHIPS

28. FAO has paid specific attention to its collaboration with other bodies of the UN System, in particular WFP. With the latter, a matrix has been jointly elaborated with the aim of mapping the on-going collaboration between WFP and FAO and further enhancing synergies between the two agencies in projects, technical cooperation, initiatives and forums and institutional issues. For example, regarding field operations, the two agencies have agreed to further implement joint activities aimed at saving lives, preserving assets and protecting livelihoods, improving health and nutrition, supporting households affected by HIV/AIDS and improving education and

training. Special attention is given to the “twin-track” approach to food insecurity. The twin track approach combines actions to improve the production and livelihoods of the family farming sub sector with measures such as social safety nets to broaden access to food and to improve nutrition.

29. FAO has also pursued its efforts to collaborate with external partners such as research institutes. For instance, FAO is engaged in a joint research project on “The changing roles of agricultural rehabilitation: linking relief, development and support to rural livelihoods” developed by the Overseas Development Institute (London, UK), International Crops Research Institute for the Semi-Arid Tropics (ICRISAT, Nairobi, Kenya) and the Institute of Public Management (IPM, Stockholm, Sweden). This project is funded by the European Commission and Department For International Development (UK). It aims to develop a greater level of conceptual clarity and identify practical strategies on how changing agricultural rehabilitation policies can contribute to linking humanitarian assistance and longer term development through the provision of effective, principled support to rural livelihoods in chronic and post conflict situations. FAO and its wide range of stakeholders will ensure a practical results oriented approach. The project will also contribute to FAO’s normative role in international agricultural policy formulation, as it will inform and better enable FAO strategies to assist countries in their transition from humanitarian to development priorities.

30. During the first semester of 2003, FAO undertook a review of its cooperation with NGOs/CSOs in the area of emergencies with a view to preparing an agreed joint FAO-NGO/CSO action plan, including the development of an internship/secondment programme between FAO and NGOs. For this purpose, FAO's collaboration with NGOs/CSOs in operational emergency activities was analysed and discussed within the Organization. Opportunities and mechanisms for developing broader and more intensive NGO/CSO involvement in FAO's emergency work were identified. A report, currently under finalization, will highlight the synergies and the potential benefits for FAO and NGOs/CSOs of enhanced collaboration (e.g. sharing of information and ideas, coordination and technical advice/support, capacity building, learning from and supporting NGO/CSO innovations and best practices). The Organization will prepare a brochure presenting FAO's intentions to improve relations with NGOs/CSOs in complex emergencies. In one or two identified countries, FAO will liaise with NGOs/CSOs to ascertain their interest in such a process and will organize a brainstorming FAO-NGO/CSO workshop on complex emergency-related activities.

ESTABLISHMENT OF A SPECIAL FUND FOR EMERGENCY AND REHABILITATION ACTIVITIES

31. As indicated in its response to the recommendations of the Evaluation, Management has prepared a proposal for the establishment of a Special Fund for Emergency and Rehabilitation Activities (document FC 102/14) and presented it to the Finance Committee. Given the present size of FAO’s emergency programme and its continuing growth, this Special Fund would enable *“the Organization to rapidly initiate emergency operations by participating in inter-agency needs assessment and coordination activities, establishing an Emergency Coordination Unit (ECU) related to agricultural assistance with the necessary logistical equipment, preparing a programme framework and projects and providing advance funding when a donor’s*

commitment has been obtained for procurement of inputs. Agricultural deadlines must be respected and time is often very short. Waiting for the transfer of donor funds often hinders the Organization's capacity to provide assistance to farmers in order for them to replant in the first planting season after a disaster."

32. The Finance Committee supported the proposal. This Special Fund was set up under the authority of the Assistant Director-General, Technical Cooperation Department with a target level of US\$ 2 million. It is anticipated that a first report on the utilization of the Special Fund will be prepared for the May 2004 session of the Finance Committee.

IV. Next Steps

33. The Secretariat will continue to implement the recommendations of the Thematic Evaluation. It is suggested that the Secretariat provide a report to the Programme Committee when any major decision has been taken on this matter or at the specific request of the Committee.

Annex 1

Table 1. Evaluation of the Strategic Objective A3 - Status of implementation of the recommendations

| Main Areas of Recommendations | Actions | Lead Unit | Status of Implementation |
|--|--|-----------|--|
| Mainstreaming emergency work within FAO | Enhancement of the programming of emergency related BOs in the PWB 2004-05 (cf. recommendation 1) | ECG | Achieved. |
| | Preparation of a paper on "The Impact of disaster on long-term food security and poverty alleviation - policy implications" (cf. recommendation 2) | ESAF | Achieved. Presented to the CFS in May 2003. |
| | Participation of FAORs in training courses organized for Emergency Coordinators (cf. recommendation 2) | TCEO | Underway - meeting planned in October 2003. |
| Strengthen preparedness for disaster | Development of an FAO strategy and priority actions for preparedness (cf. recommendation 3) | | Not yet tackled. Issue to be addressed through a sectoral approach (i.e. drought). |
| | Learning to live with drought (PAIA REHAB output 3) (cf. recommendation 3) | AGLL | Initiated - sharing information between units involved in drought-related activities; - contribution to a regional workshop on capacity building in drought mitigation, preparedness and planning for member countries in the Near East Region |
| | Updating of the manual for field staff and consultants conducting Crop and Food Supply Assessment Missions (cf. recommendation 4) | ESCG | Underway - first consultation with WFP; - greater attention to livelihoods and food security. |

| | | | |
|---|--|----------------------|--|
| | Enhanced crop and food supply assessments for the 2003/2004 agricultural season in Afghanistan (cf. recommendation 4) | ESCG/ ESAF | Achieved |
| | Establishment and Strengthening of Food Security Assessment Unit in Somalia and Afghanistan through projects (cf. recommendation 4) | ESAF/ TCEO | Achieved |
| | Disaster management information system (PAIA REHAB output 1) (cf. recommendation 4) | ESAF | Underway - inventory of existing relevant databases; - identification of basic functions and data needs; - preliminary design of an Emergency Information System. |
| | Identification of agro-environmental hotspots for vulnerable areas and regular monitoring of El-Nino. (cf. recommendation 4) | SDRN | Underway - methodology defined. |
| | Preparation of a policy and programming manual on Nutrition: "Protecting and Promoting Good Nutrition: a key element linking emergency response and development" (cf. recommendation 4) | ESNP | Underway - Manual under finalisation; - CD Rom and on-line version available on the Internet by the end of the year. |
| | Enhanced synergies between the work currently carried out under the EC-funded project on EWFIS in complex emergencies and FIVIMS (cf. recommendation 4) | ESDG/ ESAF | Underway An evaluation is ongoing in both the FIVIMS and the EC-funded programme - results relevant to this recommendation will be taken into account. |
| Enhance agricultural relief operations | Review of procurement process. In particular review opportunities for decentralization of the procurement of inputs and raised FAOR procurement limits where appropriate (cf. recommendation 5) | ECG | Issue to be addressed during the last quarter of 2003. |
| | Appointment of Emergency Coordinators: in more than 20 countries in Africa. Establishment of a Special Adviser for Africa and of an Emergency Coordinator for Southern Africa (cf. recommendation 6) | TCEO | Achieved |
| | FAO guide on needs assessment including enhanced targeting of beneficiaries (PAIA REHA output 2) (cf. recommendations 4 & 7) | TCER AGPP AGPS | Underway - elaboration of a practical tool; - Technical modules on pest management (AGPP) and seeds (AGPS) under finalization. |
| | Guidelines for Incorporating Nutrition and Household Food Security into Food and Agriculture Emergency Operations (cf. recommendations 4 & 7) | ESNP | Underway - Draft to be finalised; |
| | Review alternative approaches to seed distribution and elaboration of Guiding Principles for Seed Relief (cf. recommendation 8) | AGPS | Achieved |

| | | | |
|--|---|---------------|---|
| | Inclusion of appropriate TSS costs in project budgets (cf. recommendation 9) | TCEO/S | Initiated - internal consultation with technical divisions; - systematic review of project budget proposal. |
| | Elaboration of a review of social safety nets mechanisms and preparation of a concept paper for operationalizing HIV/AIDS mitigation activities (cf. recommendation 10) | TCER | Achieved |
| | Mid-term evaluation of FAO's post-conflict programme in Afghanistan and FAO's coordination arrangement for leading transition. Formative Evaluation of FAO's Response to the Continuing Crisis in Southern Africa (cf. recommendation 11) | PBEE/ TCE | Underway Evaluations to be achieved by the end of 2003. |
| Conduct an evaluation of the Oil-for-Food Programme in 2003-04 | Extend evaluation of the "Oil-for-Food" Programme in the North part of Iraq to be carried out during 2003-04 (cf. recommendation 12) | TCES/ PBEE | Need for this evaluation (including possible scope and timing) is being reviewed by TCES and PBEE in the light of the new developments. |
| Ensure the link from relief to rehabilitation and development | Integrated approach for programming transition activities (cf. recommendation 13) | TC | Underway Applied, for example, for Sudan and Sri Lanka |
| | Appointment, preferably soon after the emergency operation starts, of a full-time programme manager in countries where FAO will provide post-emergency transition policy and programming assistance (cf. recommendation 14) | TC | Recommendation applied on a case by case basis (e.g. appointment of a programme manager in Afghanistan) |
| Further develop collaboration with partners | Review of FAO collaboration and opportunities for enhanced cooperation with NGOs/CSOs in the area of complex emergencies (cf. recommendation 15) | TCDS/ TCER | Underway - information collected; - identification of potential areas of cooperation. |
| | Joint FAO and WFP review of respective methodologies for Crop and Food Supply Assessments and of FAO/WFP process of emergency needs assessments (cf. recommendation 15) | ESCG/ TCER | Underway - exchange of information; - definition of rooms for improvement. |
| | WFP focal point in the ECG (cf. recommendation 15) | ECG | Achieved |
| | Elaboration of a FAO/WFP collaboration matrix (cf. recommendation 15) | TCER | Achieved |
| Establish adequate funding mechanisms to respond to and mitigate the effects of emergencies | Establishment of a Special Fund for emergency and rehabilitation (cf. recommendations 16 & 17) | TCE | Achieved |
| | Regular meetings with Donors for Emergency Operations (held in November 2002 and May 2003) (cf. recommendation 18) | TCE | Achieved |