SUMMARY AND RECOMMENDATIONS

Drawing on ACF participation in Humanitarian Reform, as well as through field based examples, this paper aims to review the Reform through the implementation of its ‘pillars’ and ‘foundations’ and the achievement of their initial objectives. The three pillars and foundations being:

• The Cluster Approach;
• The Humanitarian Financing;
• The Humanitarian Coordinator and
• The Partnerships.

Specifically, concerning greater effectiveness, improved quality and increased coverage of aid delivery to victims of a crisis, ACF supports the objectives of the Humanitarian Reform, as well as the Principles of Partnership as defined by the Global Humanitarian Platform.

ACF believes that this Humanitarian Reform is a positive step, leading to more rapid humanitarian responses, and in improving the coordination between governments, United Nations agencies, the International Movement of the Red Cross and Red Crescent, and NGOs.

However, whilst we have an overall positive view, nonetheless, ACF would like to highlight some important concerns regarding the ‘roll out’ of the Reform, and believes that there are major issues that urgently need to be addressed before proceeding further.

ACF’s policy is to actively participate in the Humanitarian Reform framework, at both global and country level, however, based on our concerns, ACF would like to reserve the right to limit its participation in cases where and/or when:

• The implementation of the Humanitarian Reform may enter into conflict with ACF principles and/or the ACF Charter;
• The Principles of Partnership are not strictly observed; and
• The added value to the humanitarian operations in the areas ACF is working is not demonstrated.

ACF considers that each situation will require specific analysis that will in turn decide our level of engagement and participation. We remain concerned regarding certain key issues, such as the risk of politicization of aid, previously experienced in places like Ethiopia, Afghanistan or Zimbabwe, and the extension of UN integrated missions. Since the Reform may serve in potentially aligning political, military and humanitarian objectives within specific contexts, and could possibly merge these aspects under a single country leadership, ACF feels it would be prudent to not commit to such a systematic and equal participation at country level.

Relevant issues involving the Humanitarian Reform, and our capacity to adhere and respect ACF’s Charter, are not only political, but also financial. ACF intends to work with the UN agencies, but not systematically and considering a previous and careful analysis of the UN funding strategy, as would be the case with any other donors.
### Areas for Improvement | Principal Recommendations | Description
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**ACCOUNTABILITY AND PARTNERSHIP**

**Development of partnerships to further support operations and programming** | Develop an effective partnership through the unconditional respect for Principles of Partnership | There is an improvement in inclusiveness for all humanitarian actors in the coordination process, however, the strict respect of the Principles of Partnership in the roll out of the Reform remains a challenge, especially when it comes to the principles of equality, transparency and results oriented approaches.

**Implementation of external recommendations** | Ensure the implementation of the recommendations from independent evaluations | The tangible benefits of the partners’ actions towards beneficiary populations are increasingly assessed through independent evaluations of the Reform; however, gaps in the implementation of their recommendations are often perceived.

**Accountability to the populations affected by disasters** | Improve accountability towards beneficiaries | Concrete measures should be taken by the humanitarian actors to improve and show accountability to beneficiaries within the framework of the Humanitarian Reform. There needs to be an improved dialogue and coordination on assessed needs, facilitating responses, results achieved and gaps so that the system better serves populations affected by disasters.

**COORDINATION OF HUMANITARIAN ACTION**

**Clusters strengths and weaknesses vary considerably between cluster levels, areas and countries** | Improve coordination of humanitarian action by standardising the country Clusters role and processes | The Cluster implementation presents a very mixed picture, a high dependence on personalities and a lack of consistency. There are a number of good practices emerging in the roll out of the Cluster approach which could enhance its impact and efficiency.

**Inclusiveness for NGOs in the coordination process** | Further contribution by humanitarian funding to cover NGO resources allocated to coordination | Increasing coordination implies more cost for the participants in the Reform process. The extra time and costs of NGOs are not usually covered by extra resources dedicated to coordination functions. When NGOs are requested to play an active coordination role the costs of this should be acknowledged and covered for NGOs equally, as they are for UN lead-agencies, through humanitarian financing.

**Lack of coordination between Clusters, at country and global levels** | Strengthen inter-Cluster coordination | ACF expresses concerns about the danger of the Cluster approach reinforcing the barrier between sectors. The global coordination is a critical area where OCHA can establish its added value in providing solid support and link between the different sectors. Facilitating inter-Cluster assessments to emergency situations as well as facilitating cross-Cluster strategic planning should be prioritized by all actors involved.

**HUMANITARIAN FINANCING**

**Efficiency of the humanitarian funding mechanisms in rapid-onset emergencies** | Ensure direct funding to guarantee timely transfer of funds in rapid-onset emergencies | Recent examples of the use of pooled funding mechanisms in rapid-onset emergencies have resulted in delays in getting funds to implementing agencies. Direct funding in specific contexts should be a priority to ensure an efficient and timely humanitarian response.

**Cluster lead-agencies potential conflicts of interest** | Design accountability lines and funding schemes for Cluster lead-agencies | High levels of transparency and timeliness in the allocation of humanitarian funds are crucial. Accountability lines and funding schemes must be designed in order to increase the transparency and to draw a line between the lead-agencies’ responsibilities of coordination, funding and programming. The management of the funds should be under the responsibility of the coordination team and not under the chief of the agency implemented programs.

**Guidelines, transparency, consistency and equality of pooled funding processes** | Increase the predictability and efficiency of humanitarian funding through standardised PF/CHF allocation procedures across countries | Clear guidelines and criteria for the prioritisation of funds should be established together with strategic and technical advisory boards to support the HC in its decision process for PF/CHF allocation. NGOs should be represented in those boards and independent audits should be conducted.

**Management of the humanitarian funds and concentration at the UN level** | Set a clear and adequate overhead costs policy when funding is passed through to NGOs and reduce transaction costs | Inadequate management of funds can directly decrease the efficiency of the process and cause financial losses, mainly through the multiplication of administrative layers and duplication of the overhead costs.

**LEADERSHIP**

**HC strengths and weaknesses vary considerably** | Improve humanitarian leadership by standardising the HC role and functions | The roles of HC and RC should be clearly separated, and no longer be combined, especially in tense political contexts. In addition, efforts should be made to regulate, standardise and reinforce the role of the HC, according to the different contexts.
METHODOLOGY

ACF began the process of reviewing its first positioning paper issued in 2006, in light of experience gained over the past 3 years.

The purpose of this paper therefore, is to set out ACF’s position on the different components of the Reform and to evaluate the implementation efficiency, both at the country and global level. This paper is thus based on a series of internal consultations that took place in the course of 2009.

At the beginning of the year, a questionnaire was distributed to 11 Heads of Missions across the ACF International Network (Afghanistan, Central African Republic (CAR), Chad, Ethiopia, Haiti, Myanmar, Nepal, Palestinian Territories, Philippines, Sudan and Zimbabwe). Responses were gathered from these 11 Heads, and also 2 of ACF’s representatives in the Global WASH and Logistic Clusters Rapid Response Team, as well as the Head of the Emergency Pool in ACF-France.

Two working groups were formed at the headquarters of ACF-France. These groups discussed and analysed information regarding ACF’s experiences around the operational, technical and financial components of the Reform. The first working group was comprised of personnel from key departments (mainly operations, techniques, logistics and finances), whilst the second working group was comprised of members of the ACF-France board.

In addition, through various internal ACF consultations, this resulted in highlighting a number of key issues and priority areas, where we feel that clear improvements could be made.

In issuing this document, it is paramount for ACF to clarify, and make explicit, that the various recommendations proposed are intended for dissemination towards all humanitarian actors. Drawing on these different points that have been identified as needing improvement, ACF firmly believes that all actors involved in Humanitarian Reform have a mutual responsibility in addressing the issues elaborated within this document, thereby contributing towards a mutually proposed and purposeful solution to the improvements recommended.
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Introduction

Humanitarian Reform was launched in 2005 by the international humanitarian community. This was part of a long standing effort to streamline management within the United Nations (UN) system at country level, as well as to push for the development of a more coherent and efficient humanitarian response.

The overall objective of the Reform is to improve the effectiveness of humanitarian responses by ensuring greater predictability, accountability and partnership\(^1\). This is an ambitious effort made by the international humanitarian community to reach an increasing number of beneficiaries with greater comprehensive needs-based relief and protection, in a more effective and timely manner.

The Reform is based on three mechanisms or ‘pillars’:

- Strengthened coordination mechanisms though the Inter Agency Standing Committee (IASC) Cluster Approach;
- Reformed Humanitarian Financing and
- The establishment of Humanitarian Coordinators to enhance leadership and accountability.

In addition, the Partnership is referred to as the key underlying principle of the Reform. This Reform and its consequences are one of the major elements of the current evolution of the humanitarian architecture, and therefore of major importance for Action contre la Faim (ACF) operations.

ACF interventions are greatly affected by the Reform, both at operational and policy levels\(^2\) and our position since the inception of the Reform has been an ad hoc engagement, largely on a case by case basis. In 2006, ACF issued its first positioning paper regarding the Humanitarian Reform, in which we acknowledged the need for a more coherent and efficient humanitarian response. This positioning highlighted the risks inherent regarding the Reform, as well as key points we identified as requiring improvement.

ACF agreed to actively participate within the framework of the Reform, on the conditionality that it would not compromise its ability to make independent, strategic, and technical decisions.

The aim of this new paper is to update ACF’s position regarding Humanitarian Reform by re-examining its pillars, and their interconnected objectives. It takes into account recent evolutions of the Reform’s components and is based on ACF’s exposure to, and practical involvement in, the Reform, both at country and global levels.

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2. In 2009, ACF network is working in 21 of the 27 countries where there are effective or planned establishment of Humanitarian Coordinators. Besides, ACF is an active partner of the Clusters, both at field and global levels, and reformed humanitarian funding has been introduced in many countries were ACF is working (including countries where decentralised Pooled Funding mechanisms were established to date).
Cluster Approach

The Cluster approach\(^3\) makes a distinction between the levels of global coordination and country coordination. These distinctions primarily focus on strategy and standards (global), and the practicalities of preparedness and response (country)\(^4\).

Since its inception, the Cluster approach has achieved some positive points, however, it has also faced many challenges. Its development has also varied considerably between Clusters and countries.

ACF Participation in the Cluster Approach

ACF reiterates its full support to the concept of strengthened coordination mechanisms, and believes it has played an active role in the participation and support of the process. Indeed, ACF has been exposed to and involved in the implementation of the Cluster approach in various countries. ACF is also actively participating in several of the global Clusters, especially in the fields of Water, Sanitation and Hygiene (WASH), logistics and nutrition.

The Global WASH Cluster is one of the clusters where ACF is most active through leadership, or via its involvement, in the steering committees of 7 of the 28 projects. Of these, the organisation has led the implementation of 2 projects: the ‘Right to Water in Emergencies’ and ‘Learning’ Projects. In these projects, we are performing an overall monitoring and evaluation role against the terms of reference for the Global and Country WASH Cluster, as well as providing guidance, tools and publications to support learning and improvement in the sector.

ACF is also the co-lead on the ‘Dedicated Rapid Response Team Project’, where one of our personnel has been seconded to support cluster coordination at country level, and with the production of global WASH cluster tools. In addition to this, ACF has been involved in the steering committees of Hygiene promotion, Cluster co-ordination, Emergency WASH materials, Advocacy (linked with the Right to Water project), and actively participates in the Global WASH cluster meetings, where the strategic orientations of the Global WASH cluster are made.

ACF has been extremely active in the Global Logistics Cluster, since July 2007, with one of our personnel seconded to the Global Logistics Cluster Support Cell. ACF maintains a high level of participation in the various projects developed at the global level (tools, trainings and guidance materials), but is also involved frequently in the core management units of the Field Logistics Cluster during emergencies. This presence, and the direct link provided to ACF headquarters to the Global cluster, allows the organisation to influence the general orientations and protect the specific interests of NGOs in the Reform, both at global and field levels.

Importantly, ACF has also participated in the Global Nutrition Cluster, particularly in the Assessment Working Group. This group specifically addresses topics related to rapid assessment methodologies and tools, survey and surveillance system methodologies such as SMART, benchmarking of nutrition interventions, and the use of new WHO growth references for children. Since 2006, within the working group, ACF has participated in the production of global emergency nutrition tools, such as the Initial Rapid Assessment tool, and the ‘Nutrition in Emergency Toolkit’. This Cluster offers opportunities for ACF in terms of presenting a forum for advocacy at a high level, as well as for potential funding of projects of interest to the ‘international nutrition in emergency’ community. This is currently the case with the SMART project, devised by ACF-Canada, which is funded by IASC Global Nutrition Cluster.

With regard to the food security and livelihoods sector, the Agricultural Cluster is still mostly active at the field level. This means that ACF participation is, for the moment, restricted to the mission level. However, ACF involvement will be increased in 2010 within the Global Cluster. The FAO is undertaking a mapping of various agriculture and food security country-based Clusters, some led by the FAO, and others under the co-leadership of the FAO/WFP, with a view to improving and enhancing the support provided by the FAO (and possibly WFP) at the global level.

Our analysis of the Cluster approach, founded on ACF’s experience and participation in the Humanitarian Reform, as well as through field based examples, raised significant concerns regarding the implementation of this pillar of the Reform and whether the system is evolving towards its stated goals.

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3. There are 11 Clusters (Lead agency): Technical Clusters are Agriculture (FAO), Camp Coordination and Management (UNHCR & IOM), Education (SC & UNICEF), Emergency Shelter (IFRC), Health (WHO), WASH (UNICEF), Nutrition (UNICEF); Cross-Cutting Clusters are Early Recovery (UNDP), and Protection (UNHCR); Support Clusters are Emergency Telecommunications (WFP & UNICEF), Logistics (WFP).
4. Global Clusters responsibilities: Standards and policy-setting, building response capacity and operational support. Country Clusters responsibilities: The aim is to ensure a more coherent and effective response by mobilizing groups of agencies, organizations and NGOs to respond in a strategic manner across all key sectors or areas of activity. 13 specific areas of responsibilities are described in the IASC guidance note for the implementation of the Cluster approach.
Challenges of Implementation

The intended value of the Cluster approach is to strengthen overall response capacity, as well as the effectiveness of the response, in five key ways:

- Ensuring sufficient global capacity;
- Developing predictable leadership;
- Establishing the concept of partnership (analysed in the last part of this paper);
- Strengthening accountability and
- Improving strategic field-level coordination and prioritisation.

However, the Cluster implementation presents a very mixed picture. While the Humanitarian Reform represents a positive attempt to reach these goals, ACF feels it would be prudent to highlight the concerns pertaining to the following key concepts:

- **Global capacity**
  The aim of global capacity-building is to ensure that predictable and sufficient response capacity exists at the global level. This should be put in place to complement national-led responses to major emergencies, including the following areas:
  - Trained surge capacity;
  - Stockpiles and
  - Agreed inter-agency standards and tools.

  In several of the Clusters with which ACF is involved, there are concerns about the country roll-out of the tools developed at global level, and the disconnection of Clusters between the global and country level. ACF considers it is important to strengthen roll-out strategies and plans and indeed supports these. Therefore ACF reiterates and reasserts the need for participants in the Reform to further intensify their efforts, thus ensuring the effective and timely implementation of all aspects of the Reform at country level.

- **Cluster leadership**
  Cluster implementation however, presents a very mixed picture, and no standard has been observed or adopted in terms of leadership. The quality of the leadership, and their capacities, provided by the country Clusters depend initially on the competence and capacities of the people involved, as assigned by the lead-agencies. However, it is our experience that in any given context, some Clusters appear to be fully functional and efficient, whilst others appear to be seemingly dysfunctional and weak. This pattern has manifested itself in almost every country where ACF is involved through the Cluster approach.

  This factor necessarily affects the predictability of the leadership; even though we know in advance which agency will be in charge of the coordination in a given sector, NGOs involved in the coordination have no means to anticipate the quality of the leadership and the responsibilities that lead-agencies will be carrying out.

  Hence there is a great need for improvement and consistency regarding this point. ACF would therefore like to suggest that an internal review be considered within the UN, and for critical objectives and indicators to be developed in order to improve the systems and mechanisms and thus increase the reliability of the Clusters.

  For example, the establishment of clearly defined recruitment criteria for cluster coordinators and leaders, based on their experience in emergencies, leadership and management skills, as well as their experience in providing training in humanitarian management to their staff, would greatly improve the quality of leadership.

- **Accountability**
  The IASC-created humanitarian architecture aims to improve the quality of the collective humanitarian response in emergency situations so that it meets all the needs of affected populations. As the overarching goal, one of the most positive effects of the Cluster approach is that it gives lead-agencies a sense of responsibility. As the lead-agencies are responsible for the coordination efforts, as well as the assistance provided to populations, they are ultimately considered to be responsible should there be cases of ‘gaps’ or ‘weaknesses’ in the humanitarian strategies and responses.

  However, the degree of accountability that is expected from lead-agencies remains unclear to ACF. Therefore, the solution offered is for concrete measures to be taken by the UN to improve and clearly demonstrate accountability to beneficiaries, and to their communities within the framework of the Humanitarian Reform. Additionally, we feel there is a real need for improving dialogue and coordination on assessed needs, on planned responses, on results achieved, and gaps identified, so that the system serves populations affected by disasters in a more effective, efficient and relevant manner.

The ‘Generic Terms of Reference for Sector/Cluster Leads at the Country Level’ calls on Clusters to ensure utilisation of participatory and community-based approaches. However, one of our main concerns remains, which is, to what extent are Clusters listening to affected populations when assessing needs and including them in the planning, implementation and evaluation of projects? Although functional upward accountability mechanisms (accountability towards the HC) are needed within the Humanitarian Reform, it is also equally necessary to create clear accountability mechanisms towards our beneficiaries, who already suffer from an important power imbalance. Thus, the challenge remains in ensuring that evaluations are carried out, and lessons are learned, so as to improve future responses and to increase accountability toward beneficiaries.

**• Strategic coordination and prioritization**

The Cluster approach is aimed at ensuring a predictable, coherent and effective humanitarian response across all key sectors and areas of activity. ACF would like to highlight and bring to attention specific issues related to several responsibilities of the Cluster leads:

- **Establishment of appropriate coordination mechanisms**

  Various ACF teams based in the field (including Afghanistan, Chad, CAR, Haiti, Bangladesh, etc) have reported that a majority of the coordination mechanisms are, in practice, operating as ‘forums’ where NGOs provide information on the situation in the field to UN agencies, rather than as platforms for developing operational and technical strategies and policies.

  Whilst this fact may not be true for all Clusters, there is nevertheless a clear tendency towards this ‘forum’ approach. For example, the Cluster approaches were considered very effective for the Global WASH Cluster in Haiti and Democratic Republic of Congo (DRC), conversely however, our teams experienced repeated coordination flaws in other Clusters we were engaged with.

  Formal coordination between UN agencies and NGOs was sought, but this in practice led to heightened bureaucracy as a result, with even more regular meetings, and the formal sharing of information. In countries such as Chad, this issue was multiplied further still, through the proliferation of various coordination levels, making the coordination process extremely complicated.

  ACF’s reservations in relation to the coordination efforts are not based on the Cluster systems themselves, but rather on our experience of the UN internal systems. The reinforcement and complementarities of actions remain weak, whilst the quality of UN leadership, especially regarding strategic reflection at the technical and operational levels, is also perceived as being generally less than desired.

  The lack of efficiency in some Clusters often leads to duplication, or indeed in some instances, multiplication, of formal and informal coordination platforms. We feel that this represents a major threat to the system. For example, in CAR, NGOs have resorted in taking their own initiatives, in order to effectively process an ad hoc mapping of the operations and activities outside the UN system, in order to fill the gaps in the operational coordination.

- **Coordination with local/national authorities**

  Participation of local authorities or government representatives in the coordination efforts is, as a matter of principle, welcomed in the Cluster system, as it generally favours proactive engagement of the authorities.

  However, the presence and participation of government authorities can directly affect the level of information shared, as well as the quality of the operational strategies, in sensitive or politically tense situations. In the Philippines, for example, the flaws in the Cluster systems appear to be quite blatant and self-evident. As the Government is co-lead in every sector, the system is politically dependant on a top-down approach. As such, immediate needs are not always considered as priorities, and disagreements with the Government are rarely expressed.

  ACF strongly believes that humanitarian coordination mechanisms should remain free from political intrusion at all levels, and that personnel involved should not compromise their ability to make independent judgment on situations, strategies and priorities. ACF further believes that this principle is often breached in contexts where there are prevailing tensions or armed conflicts. For instance, the attitude of the UN vis-a-vis the governmental authorities makes the coordination process in countries such as Afghanistan, Ethiopia and Sudan quite difficult.

- **Inter-Cluster coordination and cross cutting issues**

  Regarding inter-Cluster coordination concerns, we find that the role of cross-cutting Clusters is often confusing, especially since it is already in the mandate of the thematic Clusters to better incorporate cross-cutting issues. This lack of global vision has often resulted in the reduction of the overall efficiency of the system.

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As such, ACF firmly recommends, that the leadership within inter-Cluster coordination should be taken at the OCHA and HC levels to highlight any gaps in the humanitarian response. The inter-Cluster coordination should be reinforced through stronger relations between the HC, OCHA and Cluster lead-agencies. One of OCHA’s principal functions and contributions to the humanitarian operation should be to facilitate appropriate support to Clusters, both at the individual and inter-Cluster level, as well as in bringing together the various Clusters, thus ensuring effective management of transversal issues. Through a more systematic linking of the Clusters, it would then be possible to feed coherent messages regarding activities and areas in need of strategic support and guidance from the humanitarian coordination team. OCHA’s involvement is particularly crucial in the early days of emergencies and could significantly boost the response capacity (as witnessed in Myanmar and Haiti during the last emergencies).

Inter-Cluster coordination can also be strengthened through regular Cluster lead meetings chaired by the UN Area Coordinators. This initiative, notably observed in Indonesia, served as an important forum for discussing cross-cutting issues, and facilitated information and dialogue between different Clusters.

Effectiveness of the Response and Impact

The Cluster system presents significant potential for enhancing the overall effectiveness of humanitarian responses to new crises. However, it is our experience that the roles and responsibilities are not necessarily clear, and the focus on operational impact needs to be strengthened. The methodology used to measure impact appears to be poorly coordinated, and it remains difficult for the different players to assess the impact of Humanitarian Reform.

Consequently, there is a great need to standardise the country Cluster roles and processes, and a number of good practices emerging in the roll out of the Cluster approach could enhance its impact and efficiency considerably.

Humanitarian actors should demonstrate that time spent on coordination mechanisms does indeed result in tangible benefits for their beneficiaries. In this respect, some key questions need to be addressed:

- What are acceptable benchmarks for appropriate coordination and expected impact in terms of response capacity?
- Are strengthened coordination mechanisms cost-effective?
- How effective is the Cluster approach to strengthening the humanitarian operations?
- What difference do Clusters actually make to the beneficiaries of humanitarian aid?

Unfortunately, these questions remain unanswered.

To illustrate, in an emergency context such as that in the DRC, where the Pooled Fund and CERF increased funding, it still remains unclear whether the level of aid that reached the beneficiaries increased proportionately.

Also, ACF observed that, in many other contexts, monitoring and evaluation projects failed to assess the impact of the aid programs on the living conditions of the target population. For example, the evaluations in Haiti following the emergency in November 2008 were reported to be poorly planned, with unclear goals, raising several concerns from the ACF field team. Security restrictions and limited access to the field also hampered the capacity of UN agencies to lead efficient evaluations.

ACF therefore feels it is paramount to clearly highlight the importance of ensuring independent evaluations of the Humanitarian Reform, primarily focused on efficiency, effectiveness, and impact, as well as the need to implement the recommendations coming out of those evaluations.

ACF also recognises that one of the major challenges is in finding the right balance between the costs and the benefits in strengthening coordination mechanisms. Resources are allocated to fund Cluster lead-agencies to take more responsibility in sector coordination. However, the extra time and costs incurred by NGOs are usually not covered by the extra resources dedicated for these coordination functions. This may critically affect the ability of NGOs to participate in the coordination schemes. It should be apparent to donors that coordination implies increased costs and requires further allocation of resources and time for humanitarian organizations.

When NGOs are requested to play an active role in coordination (e.g. as local focal points, leaders of a specific technical working groups, Cluster co-leads etc) the costs of these coordination activities needs to be acknowledged and covered equally for participating NGOs, as well as the UN lead-agencies.

In the past year alone, ACF had to refuse an active coordination role in the WASH Clusters during the Haiti and Zimbabwe emergencies because of a lack of resources and direct funding for humanitarian coordination activities.

In essence, it is critical to recognise that facilitation and coordination roles cannot be shouldered by NGO personnel at the expense of program delivery, without genuinely risking a decrease of the operational capacity of the NGO partners.
Humanitarian Financing

The Humanitarian Reform financial instruments present challenges in terms of the robustness of the UN country team and in the peculiarities of each government. The systems in place in the various ACF missions are notably dissimilar, which is in part due to the different political environments in which they operate. Consequently, the financial architecture of the Reform and its impact varies greatly from country to country.

The primary objectives of the humanitarian financing mechanisms should be:
- to provide adequate, predictable, timely and flexible financing;
- to ensure complementarity of funding and
- to respect the principles of equality, transparency and impartiality.

Although the implementation of this pillar of the Reform presented positive results, such as the increased access to funds for emergencies, conversely, the Reform also presents imperfections, especially in regards to the requirements in its general framework, as well as in each financial tool.

General Implementation of the Financial Components

Impact on the NGO access to direct funding

One of the main concerns raised by humanitarian participants is the potential risk among some donors to channel their funds and shift their support through the Humanitarian Reform instruments. Although in the past there has sometimes been an important injection of bilateral funds by financial components of the Reform, ACF believes that this has not yet resulted in a dependency towards the UN. ACF has not noticed a concentration of the funds available during the major emergencies in 2008 (namely in Myanmar, Haiti and Zimbabwe). In some cases, interesting changes were even introduced, such as effective fund raising, decentralisation of the funding decisions, and the establishment of more representative governance mechanisms.

As such, NGOs need to stay alert in situations where the great majority of the funds transit through the UN system, creating a full replacement of direct financing mechanisms. This situation has been witnessed in the past in DRC and presents a significant threat to the humanitarian financing architecture.

Within this context, ACF fully supports the Global WASH Cluster initiative to strongly advocate against the use of pooled fund mechanisms in rapid-onset emergencies. Pooled fund mechanisms, in our experience, have virtually always guaranteed delays in getting money to implementing agencies.

Potential conflict of interests

Genuine concerns remain regarding the ability of UN agencies in managing their portfolios of diverse interests, and in them dispersing large funds in an open, relevant, and transparent manner. This is especially true, as many of the UN agencies themselves are potentially recipients of these same funds.

The reformed financing system is controlled by agencies that are also mandated to define operational and technical strategies. This situation often leads to confusion between the lead-agencies functioning in the framework of the Reform and its operational responsibilities. The fact that lead-agencies are also potential donors inevitably influences the technical and operational partnership.

ACF is deeply concerned that these issues, linked to the double role of the Cluster, leads to potential conflicts of interest related to funding decisions. We feel that this has yet to be resolved. Innovative governance systems have been introduced to manage pool funding schemes. However, Cluster leads still play a crucial role in facilitating the allocation of this funding. Although some Clusters have promoted dedicated Cluster coordination units, which do not involve program management, in order to minimise the potential conflict, the issue still remains unresolved. This is essentially because the Cluster leadership is ensured by the UN agency, and therefore under the ultimate responsibility of the country representative of the agency.

ACF therefore strongly suggests for accountability lines and funding schemes to be redesigned in order to increase the transparency of the different processes, and minimise the potential conflict of interest within Cluster lead-agencies between their responsibility for coordination, funding and programming. In addition, ACF feels that the management of the funds should be under the explicit responsibility of the coordination team and not under the chief of the agency, as is the case presently. Also, we recommend that NGOs should advocate for an implementation of best practices, as well as for the inclusion of these NGOs in the financing tools advisory boards (specific to CHF/PF).
**Politicization of the mechanisms**
Important concerns arise from the potential confusion between the political and donor agendas of the UN. It is understood that UN agencies and donors inevitably have a political agenda but the difference remains in the fact that UN agencies are bound by their mandate to interact with host governments. In tense political contexts such as Sudan or Afghanistan, the influence of politics in humanitarian affairs, especially at the financing level is inevitable.

**Central Emergency Response Fund (CERF)**
The CERF is a major element in the ongoing reform of the humanitarian financing. Since its launch on 9th March 2006, CERF has committed more than $1.3 billion for over 1,300 projects in 71 countries across Africa, Asia, the Middle East, and Latin America, as well as the Palestinian Territories. This fund continues to grow, with over $259 million USD allocated in 2006 increasing to almost $457 million USD in 2008.

Although ACF views the impact of the CERF as positive and its implementation successful, two important issues arise which directly affect the efficiency of this funding mechanism.

**Multiplication of the administrative costs through the indirect access to funds**
ACF understands that, only UN agencies are able to directly access the CERF, and subsequently use funds directly for themselves, or to further disperse them to others. In a direct way, one of the key consequences is that the CERF has given UN agencies considerably more financial resources to support operations in the field. Although UN agencies have been donors for UN implementing agencies, the CERF converts the UN agencies involved in the CERF management in another institutional donor.

Nonetheless, negotiations with UN partners can become, more or less difficult, depending on various factors, such as the country policy of each agency. ACF feels that, if the UN agencies are not careful in managing the funds originating from the CERF in a transparent and equitable manner, there may be ethical issues in having UN agencies de facto serving as a transit layer for CERF funds. Poor management of these funds could directly decrease the efficiency of the process and cause losses for NGOs, as well as for beneficiaries. This would be primarily through the unreliability of the system and duplication of the overhead costs, which ACF have observed as being the major negative aspect of the current system.

Rapid analysis of the statistics available through the UN shows the losses caused by the duplication of overheads. In the first instance, 3 percent of all donor contributions to CERF go towards indirect support costs incurred by the UN Secretariat. Then, UN agencies take up to 7 percent for indirect support costs when they receive CERF funding. In addition, it would be reasonable to expect NGOs to take between 7 to 10 percent of the funds as overhead costs. As a result, up to 20 percent of the CERF funds channelled to NGOs are automatically deducted. Therefore, to some degree, the CERF could be perceived as an extra-layer between the donor and the final recipient of aid.

Unfortunately, it is impossible to estimate the actual overall losses incurred through the duplication of overhead costs as there are currently no available statistics on the percentages of the CERF funds distributed to NGOs. However, these numbers are important for specific contexts. For instance, out of $38 million allocated to DRC in 2006, about 64 percent was disbursed to NGOs by February 2007. From this, we can therefore expect that the 20 percent of this disbursement, estimated at nearly $4.9 million, was dedicated to overhead costs during this single year alone.

At present, there are no CERF policies regarding overhead costs. Therefore, we would firmly argue for an urgent need to clarify the situation and agree on common rules.

**Need for greater transparency**
ACF teams in the field, including those in Sudan, Chad, Philippines, Nepal and Zimbabwe, generally have very little information regarding the processes and transparency of procedures. This remains a major concern. The exception is Myanmar, where the information on the two CERF was disseminated satisfactorily. The information available to NGOs is usually limited to the amounts allocated to this instrument and the donors involved. The system could therefore be substantially improved at this level.

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Pool Fund or Common Humanitarian Fund (PF/CHF)

PFs and CHFs were established in 2006, in DRC and Sudan respectively. The key purpose of these mechanisms was to delegate financial authority to the HC so that gaps, both sectoral and geographical, could be better covered.

This new funding mechanism leans on all pillars of the Humanitarian Reform. These are decentralised common funding mechanisms managed by the HC, with the support of OCHA and the Clusters. In principle PF/CHF allocations are supporting common strategies established through the Cluster systems. The Cluster lead plays an advisory role for funding decisions, and the HC is the ultimate decision maker for the allocation of funds. Funds are usually channelled through UNDP. By the end of 2008, $838 million transited through this mechanism.

This mechanism has been proven to stabilise, and even multiply, the sources of funding, as smaller institutional donors are attracted by the facilities of the system. ACF wishes to note for instance, the positive impact of the mechanisms in CAR, where it has, at some point, supported the expansion of the ACF assistance in 2008.

The scale of the funds in terms of absolute and relative levels remains important; in 2006-2007 the PF remained the single largest donor in DRC, representing 21-28 percent of total humanitarian funding, whilst in Sudan the CHF represented just 11-16 percent of overall funding flows. This factor consequently affects how the funds are used and perceived in different contexts, and there is a real risk that this type of fund becomes too dominant, as a proportion of funding, and therefore subsequently reduces the necessary diversity in funding tools available.

Standardisation of the procedures

Some of the most pressing issues which ACF wishes to highlight are related to procedures. These are highlighted below:

- Lack of guidelines and transparency on funds allocated by UN agencies;
- Lack of consistency of the administrative procedures between the UN agencies and
- Lack of equality in the process (e.g. auditing rules differ between NGOs and UN agencies).

Since UN agencies are adopting the role of institutional donors, they should be given the same tools and guarantees as other donors. Efforts made in CAR by the former HC to put in place a transparent system were widely appreciated by the NGOs. Sadly, following the departure of the HC, the system did not survive, and was not replaced for several months. ACF believes that important efforts should be made to maintain such initiatives, as well as to spread them across other countries.

Pooled funding mechanisms have been piloted in several countries and different management systems have been tested. We strongly recommend and support the idea that procedures urgently need to be standardised across countries, in order to guarantee transparency, and for real NGO consultations to take place in PF/CHF allocation decision-making.

Furthermore, we suggest that clearly defined and agreed criteria for the prioritisation of funds should be established to improve the overall transparency, and to help encourage real participation and inclusion of NGOs in the process. One mechanism could be for strategic and technical advisory boards to be established systematically, in order to support the HC in its decision-making process for PF/CHF allocations. Essentially, NGOs should be represented within these boards, and independent audits should also be conducted to improve procedures.

Privileged access to NGOs

In order to ensure a better distribution of the humanitarian funds, and to ensure a greater complementarity between humanitarian actors, UN agencies should try giving priority access to NGOs for the amount allocated in the PF/CHF, depending on the context and funds available. These agencies already have direct access to the funds allocated in the CERF so have no need to be included in the process.

This solution was applied by the HC in Sudan for the PF mechanism. Given the large amount of funds already channelled by the UN agencies, he strongly advised them to give priority to the NGOs in the allocation of the PF. Considering the small amount of money injected in the PF (around $100 million) compared to the Consolidation Appeals Process (CAP) (2.1 billions) this solution appeared to be approved by all agencies involved.

Humanitarian Coordinator (HC)

The role and leadership of the HC have been recognised as one of the least developed pillars of Humanitarian Reform. Whilst it is recognised they need strengthening, the HCs continue to play an important part in the operationalization of the Reform, particularly in relation to the dispersion of the new humanitarian financing mechanisms. Nonetheless, in general, HCs have proved to be an asset to non-UN players, provided they maintain political neutrality and have extensive experience in humanitarian aid and coordination.

Role of Humanitarian Coordinator

It is our experience that this aspect of the Reform has been disappointing, and has been implemented in an uncoordinated fashion. The actual role of the HC has varied considerably from one country to the other, and in our opinion, the strengthening of the HC seems to remain one of the weakest aspects of the Reform.

ACF has witnessed an extremely wide variety between the levels of involvement of humanitarian coordination in the various contexts in which it works. There has been a lack of standardisation with regard to this pillar of the Reform, and although some very positive feedback was reported in specific contexts, the HC is generally perceived as rather inaccessible and remote. This experience of remoteness or aloofness is particularly pronounced in regard to humanitarian priorities, needs, and issues. In this regard, ACF firmly advocates for the IASC standards to be automatically applied in the appointment of HCs, and that their official terms of reference be respected at all times.

Strong leadership from the HC is crucial. A lack of robust leadership adversely affects the partnership, the position and importance of the NGOs in the Reform country architecture, and in particular, the humanitarian response, especially if funding or coordination issues are underestimated. A powerful example of this was in Chad, where ACF witnessed at first hand, the consequences of this lack of leadership by the HC. The UN country team, which should be directly accountable to the HC, failed to recognise the key role of the HC (in the country humanitarian architecture) causing different lead-agencies to develop the Clusters in an uncoordinated fashion.

Gaps in the appointment of the HCs should not be allowed to occur, or indeed be tolerated. In another example, in CAR, a prolonged gap in appointing the HC adversely affected the humanitarian response, leading to a loss of common global vision, and the redistribution of the resources.

Double-hatted Coordinator

In the vast majority of the countries in which ACF intervenes, the roles of the HC and Resident Coordinator (RC) are combined, and in some situations, such as integrated missions, other responsibilities may also be integrated. This inevitably creates conflicting priorities and challenges regarding accountability.

ACF has major concerns regarding the risks associated with concentrated strategic decision-making and key advisory roles for resource allocation. It is a deep concern that this is in the hands of ‘double-hatted’ coordinators, who are not necessarily independent, and who may work under the heavy influence and pressure of governments.

This issue is of supreme concern in the case of UN integrated missions, where ACF considers that the humanitarian principles of neutrality and independence are likely to be severely affected by political interference.

The humanitarian coordination mandate therefore needs to be clearly and explicitly distinguished from that of the military and/or political mandate. Indeed, humanitarian coordination mechanisms should at no time remain the responsibility of an organization or institution with a military mandate. The integration of military, political and humanitarian components into the same operations and objectives would clearly be a threat to the independence and neutrality of the humanitarian action.
Concept of Partnership

A central element of Humanitarian Reform is the strategic partnership between NGOs, the International Movement of the Red Cross and Red Crescent, and UN agencies. Cluster lead-agencies should ensure that all humanitarian agencies are given the opportunity to equally participate in setting the direction, strategies and activities of the group, and to ensure the complementarity amongst those operating within their sector. They should also ensure the alignment of aid objectives between humanitarian actors and the recipient country.

ACF wishes to highlight the fact that individual agencies must continually re-determine and reassess their own levels of participation in the work of the sectoral group. In the guidance notes for the implementation of the Cluster approach it is mentioned that:

« The Cluster approach itself does not require that humanitarian actors be held accountable to sector leads. Likewise, it does not demand accountability of non-UN actors to UN agencies. Individual humanitarian organisations can only be held accountable to sector leads in cases where they have made specific commitments to this effect. »

It is essential that these statements, as well as the Principles of Partnership, are respected and promoted. Clear and jointly agreed roles and responsibilities should be developed among the different participants to encourage commitment to the Reform mechanisms. ACF has unfortunately witnessed situations where the system was failing to respect the humanitarian objectives and the partnership’s common goal. For instance, in Afghanistan, the Reform mechanisms implemented are directly affected by military and political objectives. Additionally, in the Somali region of Ethiopia, restrictions posed on access have constrained the transparency and independent targeting and monitoring of aid delivery.

ACF is committed and mindful not to participate in any Cluster that would fail to respect the strategic partnership. ACF will devote particular attention to the strict respect of these principles when the UN mandate is going beyond humanitarian operations in conflict related crises.

Principles of Partnership endorsed by the Global Humanitarian Platform (GHP)

- **Equality**
  Equality requires mutual respect between members of the partnership irrespective of size and power. The participants must respect each other’s mandates, obligations and independence and recognise each other’s constraints and commitments. Mutual respect must not preclude organisations from engaging in constructive dissent.

- **Transparency**
  Transparency is achieved through dialogue (on equal footing), with an emphasis on early consultations and early sharing of information. Communications and transparency, including financial transparency, increase the level of trust among organisations.

- **Result-oriented approach**
  Effective humanitarian action must be reality-based and action-oriented. This requires results-oriented coordination based on effective capabilities and concrete operational capacities.

- **Responsibility**
  Humanitarian organisations have an ethical obligation to each other to accomplish their tasks responsibly, with integrity and in a relevant and appropriate way. They must make sure they commit to activities only when they have the means, competencies, skills, and capacity to deliver on their commitments. Decisive and robust prevention of abuses committed by humanitarians must also be a constant effort.

- **Complementarity**
  The diversity of the humanitarian community is an asset if we build on our comparative advantages and complement each other’s contributions. Local capacity is one of the main assets to enhance and on which to build. Whenever possible, humanitarian organisations should strive to make it an integral part in emergency response. Language and cultural barriers must be overcome.
**Principles of Partnership**

The Global Humanitarian Partnership (GHP)\(^{11}\) has established the following Principles of Partnership to set out a common understanding of, and approach to partnerships:

- Equality
- Transparency
- Result-oriented approach
- Responsibility
- Complementarity

The Principles of Partnership are supposed to provide a template to gauge coordination between agencies.

However, ACF has observed that some of these principles are not fully respected, or implemented, by the different participants in the Reform, and we would like to draw attention on these most pressing issues.

**Equality among partners**

One of the most positive effects linked to the creation of the partnership is the inclusion of local NGOs, as well as local/national authorities, in the consultation and decision-making processes. However, their inclusion will only prove its real added value when these processes demonstrate greater flexibility (through specific measures to favour their participation), and when the participation and engagement of the local NGOs in the Reform can be ensured through extra resources.

Although the involvement of the local/national authorities represents additional challenges (especially in a politically tense context), their participation in the Reform is essential in order to strengthen the national capacities and responses. However, the Reform has not yet offered convincing answers in regard to the equal treatment of the different humanitarian participants.

At the same time, the risk of dependency of the NGOs to the Reform mechanisms, especially to the Cluster lead-agencies, remains present. This is due to the centralisation of operational, financial and technical decision-making. A major question is how this trend is affecting the independence of operational NGOs (local, national and international), and as a result, their ability to effectively represent the needs of beneficiaries. ACF will always be in a position to promote the principle of equality whenever the partners’ financial or strategic independence are affected.

**Transparency in the funds allocation processes**

This issue should be tackled as a priority, in order to improve the capacity and willingness of NGOs to access humanitarian funding, and to ensure their increased involvement in the Reform. Because money now travels to beneficiaries less directly than with regular bilateral mechanisms, NGOs are becoming more concerned about the significant administrative fees that UN agencies charge for acting as an intermediary between the donors and the NGOs. Consequently, NGOs struggle to assess the true added value of the partnerships, as there is very little transparency in the financial process.

Although ACF missions are nowadays exposed to several forms of reformed humanitarian funding, these sources of funding remain limited in our budgets. The general lack of transparency of these mechanisms, together with a poor level of trust (regarding financial and administrative effectiveness) and communication can lead NGOs to consider those funds dedicated to the Reform financial mechanisms as “funds belonging to the UN” (as opposed to “funds dedicated to the participants in the Reform”).

**Adherence to the result oriented approach**

Within the Clusters, ACF has found that political considerations often enter into operational coordination through general positioning, policy development, and funding, as well as through its inclusive approach (i.e. participation of players from political, military and humanitarian backgrounds). As a result, coordination mechanisms tend to lose their independence and the results oriented approach. This has been the case in Afghanistan, where the assistance to specific regions or populations has been observed to serve the global political interest implemented through the “stabilisation” agenda.

By respecting humanitarian principles, it is critical that the humanitarian coordination needs to remain independent from the political component of the UN country strategy, in order to genuinely prioritise humanitarian needs and ensure real positive impacts for target beneficiaries.

ACF believes that it is necessary to always advocate for the depoliticization of aid.

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11. The GHP was established in 2006 as a complementary initiative and offers a forum for NGOs, the International Red Cross and Red Crescent Movement and UN agencies to come together and share responsibility for enhancing the effectiveness of humanitarian action. The objective was also to maximise complementarities based on organisations’ different mandates and mission statements.
Conclusion

Through this review process it has been found that, although there have been some important improvements in the roll out of the Reform since ACF’s last positioning paper, several key points still need to be improved.

The key standard by which Humanitarian Reform should ultimately be gauged is impact; impact on the people in need, as well as impact on the humanitarian environment. The assumption that strengthening coordination through the Humanitarian Reform framework serves the general interest of the humanitarian community might be true for donors and UN agencies, but from our observations and experience, it continues to remain speculative for the beneficiaries, as well as for NGOs.

Even in situations where new funding mechanisms allow more money to flow into humanitarian activity, the problem is that there is very little transparency about how much funding actually goes to assisting and protecting beneficiaries, and how much is getting stuck in the extra layers of administration that the Reform mechanisms have created.

We recognise that a methodology to gauge impact is being developed, along with a variety of evaluation and training tools. However, from the evidence observed, this development appears to be poorly coordinated between Clusters, as well as between country and Global Clusters.

There is therefore an urgent need to develop and implement a comprehensive strategy to guide the development of the clusters in a convincing and coordinated fashion (at the global and country level, as well as between the clusters), and for a global and efficient financial strategy, to ensure a robust implementation of the partnership.

In concluding, ACF believes that it is still too early to know whether or not the Cluster approach, and the new funding mechanisms, allow for a more appropriate and efficient allocation of aid. However, on a positive note, ACF feels that the initiative has the potential to realise this aim, assuming that some of its current flaws and dysfunctions are robustly addressed by all the participants involved in the Reform process.
### ACRONYMS

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