COMMENTS ON THE UNFPA DRAFT COUNTRY PROGRAMME DOCUMENT FOR THE GAMBIA

Comments by Germany	UNFPA country/regional office response to comments
We fully support the programme priorities and partnerships. UNFPA's work will be an important contribution to the public health system in the Gambia. As far as we can tell, UNFPA suggests the right strategies for each output to be reached by 2028 and has also sensibly assessed potential risks and how they can be mitigated.	We thank the Federal Republic of Germany for this feedback and count on its continuous support in realizing the objectives of the 9th UNFPA country programme for the Gambia.
The programme rationale outlines that FGM still occurs for several reasons in the Gambia and that 73 per cent of women aged 15-49 years have experienced it. The respective UNSDCF outcome indicator states a target of 70% of prevalence of FGM for women aged 15-49 years by 2028 (down from 73% in 2019). We would appreciate an explanation for this indicator, including its ambition level, as a prevalence rate reduced by 3 percentage points seems little progress within ten years. Given the wide-ranging consequences of FGM, we would like to see a much higher reduction rate as a target for this outcome indicator and kindly ask UNFPA to raise the level of ambition significantly.	We appreciate the Federal Republic of Germany's important comments on the issue of FGM and would like to express the UNFPA commitment to scaling up efforts to ensure a significant reduction in the prevalence of FGM. We acknowledge that FGM is a gross abuse of human rights with far-reaching consequences on the health and well-being of women and girls. The target for the UN Sustainable Development Cooperation Framework was set considering the previous experience in efforts to reduce the FGM prevalence rate over the past 10 years, notably the limited human and financial resources available, the timeframes required for gender and social norm change as well as the development of an enabling legal environment to stop the practice in the country. It is also important to note that the recent first-ever conviction of three women practising FGM in 2023 resulted in a nationally polarized debate on the issue, leading to a Fatwa from the Islamic Council deeming FGM a religious right, and an (ongoing) attempt within the National Assembly to repeal the 2015 Women's Amendment Act banning FGM. These reversals are is still very much possible.
	UNFPA is working closely with the National Human Rights Commission and other civil society organizations, including women and youth-led CSOs, to raise awareness among communities on the harmful effects of FGM. The

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country office has also trained media houses and social media influencers to address FGM with the right evidence.
Therefore, considering the push-back mentioned above, UNFPA regards the target to reduce the prevalence of FGM from 73% to 70% in five years ambitious.
It is important to note that the country has reduced the FGM prevalence rate by 2% over the past 12 years (2008-2023) – compared to 0.1% between 2008 to 2013 – thanks to scale-up of programme interventions through the UNFPA-UNICEF Joint Programme on FGM. The Joint Programme adopted several approaches, including: movement building with critical stakeholders; promoting positive masculinity; engaging men and boys; creating enabling legal environments; and working with young persons as agents of change.
It is important to note that this country programme target for FGM prevalence rate reduction is based on an <u>investment case</u> projection that takes into consideration available and projected resources (both human and financial), the enabling environment, and mechanisms and systems available in the country to support interventions aimed at reducing the prevalence rate. This investment case indicated that over the next eight years (2023-2030), 520,000 women and girls are at risk of FGM; the most ambitious scenario estimated that with an investment of \$10 million within this period, 155,558 cases could be averted.
UNFPA will continue to work with the Ministry of Gender, Children and Social Welfare and the Ministry of Health, as well as UNICEF and other UN agencies and CSOs, such as Tostan (a new partner), to help build a feminist movement, empower women and girls through social norm change interventions, strengthen data collection and dissemination through the GBV information management system (established in 2023), and engage men and boys to promote positive masculinity to tackle FGM.
UNFPA will also organize, under the leadership of the relevant ministries, a national dialogue with key stakeholders, including the National Human Rights Commission, faith-based organizations, the network of Imams across the country, CSOs, as well as youth- and women-led organisations.