

COMMENTS ON THE UNDP DRAFT COUNTRY PROGRAMME DOCUMENT FOR GEORGIA

First regular session 2026

Member State	Comments by Member State on the UNDP draft CPD	Country Office response	Action/Revision made in the draft CPD
GERMANY	<ul style="list-style-type: none"> Germany trusts that the CPD has been developed with the UN80 initiative in mind and strongly urges UNDP to strive for enhanced cooperation with UN entities active in the project country, be it through joint programmes, shared office space, shared-back offices and other efficiency measures wherever possible. Any duplicative efforts regarding the activities of UN or other programmatic entities must be strictly avoided. Germany trusts that UNDP will pursue its programme activities in line with its core mandate and comparative advantages, coordinated closely with the Resident Coordinator's office, and will avoid undue competition with other UN entities. 	<ul style="list-style-type: none"> UNDP appreciates Germany's review of the CPD and the constructive feedback. UNDP values the close collaboration with Germany and its representation in Tbilisi and welcomes any opportunity to discuss UNDP's programme in more detail. UNDP reiterates its strong commitment to the UN80 initiative, the One UN approach, and working closely with the UN Resident Coordinator (UNRC) in Georgia. UNDP supports a coherent UNCT by engaging in five joint projects with sister agencies and by managing UN House and other UN common premises in Tbilisi. As reflected in paragraph 17 of the CPD, UNDP will continue to promote joint programming, as well as shared services and other common back-office solutions, avoiding duplication and ensuring that its activities are anchored in its mandate and comparative advantage and remain fully complementary to those of other UN entities. We look forward to deepening collaboration with Germany and remain available to present detailed plans and progress on efficiency measures and joint initiatives. 	<ul style="list-style-type: none"> No changes have been made to the draft CPD; clarifications are provided in the Country Office response.
	<ul style="list-style-type: none"> We welcome the CPD for the cooperation of UNDP with Georgia. Supporting the implementation of the SDGs and climate goals sets the right priorities. We support the focus on inclusion and working with/strengthening of non-state actors, in particularly civil society organisations. 	<ul style="list-style-type: none"> UNDP appreciates Germany's support and welcomes the positive feedback on the draft CPD and its strategic focus. 	<ul style="list-style-type: none"> No changes have been made to the draft CPD; clarifications are provided in the Country Office response.

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	<ul style="list-style-type: none"> The CPD does not sufficiently address the recent political changes in Georgia. They pose a serious risk both to the achievement of the goals, set forth in the CPD as well as to the proposed methods of implementation, in particular regarding the cooperation with non-state actors. The document needs to be more specific on the overall political framework (both legal and in practice) and how UNDP plans to address the severe restrictions that this framework poses. 	<ul style="list-style-type: none"> UNDP acknowledges the comment and provides the following clarification: The UNCT, with support from the wider UN development system, conducted a comprehensive Country Analysis (link) as part of its strategic planning process leading up to the design of the UN Sustainable Development Cooperation Framework for Georgia 2026-2030 (UNSDCF). The CPD is derived from the priorities and the results framework of the UNSDCF and therefore also presents UNDP plans to address challenges identified in the Common Country Analysis. UNDP continues to engage closely with all partners – Government institutions, civil society organisations, private sector, and donors – to implement its programming in Georgia in a risk-informed and conflict-sensitive manner, while navigating political and operational challenges. As outlined in paragraphs 8 and 43–44 of the CPD, UNDP recognizes the risks posed by the evolving political and legislative environment. To mitigate these, UNDP will continue to apply adaptive management, impartial policy dialogue, and targeted support to civil society. Output 3.2 further reflects our commitment to maintaining and expanding civic space through inclusive, community-driven initiatives. The CPD also details targeted support to CSOs to strengthen their capacity for advocacy, service delivery, and confidence-building, in line with international human rights standards. UNDP stands ready to provide further details on its risk mitigation strategies and welcomes continued dialogue with Germany and other partners to ensure the CPD remains responsive to Georgia’s evolving context. 	<ul style="list-style-type: none"> No changes have been made to the draft CPD; clarifications are provided in the Country Office response.
	<ul style="list-style-type: none"> Also, a paragraph should be added that addresses cooperation and alignment with 	<ul style="list-style-type: none"> UNDP acknowledges the comment and provides the following clarification: UNDP will continue to actively 	<ul style="list-style-type: none"> No changes have been made to

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	<p>other donor organisations. How will the work be coordinated, redundancies avoided and synergies created and used to maximize development impact?</p>	<p>engage with all development partners in Georgia, including donors. These include regular Ambassadorial Working Groups and Development Partners' meetings, organised under the auspices of the UNRC and with other UN agencies.</p> <ul style="list-style-type: none"> • As outlined in paragraphs 17 and 45 of the CPD, UNDP will continue to leverage its integrator role within the UNCT and engage in joint programming, policy dialogue, and multi-partner coordination mechanisms to avoid duplication, align efforts, and maximize development impact. • Through the UNSDCF Outcome Results Groups, UNDP works closely with donors and UN agencies to coordinate programmes, avoid duplication, identify gaps, and streamline joint reporting. • Referring to paragraph 42 of the CPD, the establishment of a regular/annual programme board is planned to oversee the implementation of the country programme over the next five years. 	<p>the draft CPD; clarifications are provided in the Country Office response.</p>
	<ul style="list-style-type: none"> • Strategic priority 2 (Outcome 2) is particularly welcome. The recent political context has increased the need for reforms significantly. How does UNDP hope to achieve this outcome? How will UNDP cooperate with other international and multilateral donors to align efforts? 	<ul style="list-style-type: none"> • UNDP welcomes Germany's strong support for Strategic Priority 2 - effective governance (corrected in text to 'Outcome 3') and fully recognizes the increased need for reforms in the current political context. • UNDP continues its support to the reform process in Georgia and will contribute to the outcome through various interventions, including support to the ongoing decentralization process and efforts to make governance more inclusive (CPD paragraphs 34–36). • Referring to the comment above, UNDP will ensure coordination and cooperation of its efforts through UNSDCF Outcome Results Groups as they relate to all outcomes. 	<ul style="list-style-type: none"> • No changes have been made to the draft CPD, except the outcome number linked to Strategic priority 2 was corrected to state Outcome 3.

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	<ul style="list-style-type: none"> I. 17. Given the decreasing financial resources of UN-programmes, Germany welcomes joint programming which utilizes the comparative advantages of all UN-organisations. 	<ul style="list-style-type: none"> UNDP acknowledges the comment, which is highly appreciated. As mentioned above, UNDP is currently engaged in five joint projects. 	<ul style="list-style-type: none"> No changes have been made to the draft CPD; clarifications are provided in the Country Office response.
	<ul style="list-style-type: none"> II. 24 We value UNDP's support to the NDC 3.0 process. At the same time, we see this process at risk. NDC 3.0 has not been ratified yet, let alone made public. Important climate laws have not been ratified and the national budget lacks sufficient fundings for climate change adaptation measures. All in all, ownership of the Georgian Government should be guaranteed. How does UNDP plan to address these risks? 	<ul style="list-style-type: none"> UNDP acknowledges the comment and provides the following clarification: Although NDC 3.0 is not yet approved, the Government has assured UNDP it will be endorsed by year-end, a commitment reiterated by its representative at COP 30 in Brazil. The final document has been validated by experts and a wide range of stakeholders, including civil society, state institutions, academia, women, youth, and persons with disabilities groups, and has been discussed with regional and municipal authorities. UNDP has reminded the Ministry of Environmental Protection and Agriculture (MEPA) to accelerate its approval for UNFCCC submission. UNDP is working with MEPA and the Administration of Government (AoG) to support coordination around the NDC 3.0 financing and implementation once approval is confirmed. 	<ul style="list-style-type: none"> No changes have been made to the draft CPD; clarifications are provided in the Country Office response.
	<ul style="list-style-type: none"> II. 26. Support to EU integration is named as a goal. While this is appreciated in the long term, it contradicts current realities. It is almost certain that there will be no EU integration process to be supported in the coming years. Therefore, the formulation should be more balanced. For example, UNDP could support the implementation of EU standards in various areas (to be specified by UNDP) in Georgia. Most welcome would be the support to implement these standards in the field of governance (rule of law, checks and balances, transparency, 	<ul style="list-style-type: none"> UNDP appreciates Germany's thoughtful feedback and agrees that, while EU integration is a long-term aspiration enshrined in the Georgian Constitution, the current focus is on supporting the implementation of EU standards and sectoral reforms, particularly where these are aligned with the 2030 Agenda and the SDGs. UNDP's approach is responsive to current realities, focusing on reforms that advance Georgia's development and democratic governance, regardless of the pace of the formal EU integration process. UNDP therefore continues its support to the reform process in Georgia, including those aligned with the EU accession process. As outlined in CPD paragraphs 30 	<ul style="list-style-type: none"> No changes have been made to the draft CPD; clarifications are provided in the Country Office response.

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	<p>accountability and participation, elections).</p>	<p>and 34–36, UNDP’s support includes implementation of EU standards in areas such as governance, environmental protection, and rule of law, in line with Georgia’s constitutional aspirations and ongoing reform agenda. Examples in the area of rule of law include increasing equal access to legal aid, mediation, and environmental justice. UNDP welcomes continued dialogue with Germany and other partners on priority areas for standards implementation.</p>	
	<ul style="list-style-type: none"> II. 29. We commend the focus on participation and engagement of all community voices. We strongly recommend to be more specific in the CPD on how this will be achieved. The current repressive environment in Georgia is seen as a risk to this effort. 	<ul style="list-style-type: none"> UNDP acknowledges the comment and provides the following clarification: UNDP continues to advocate for an inclusive governance system, which is also identified as an overall outcome in the UNSDCF and the UNDP CPD. UNDP also collaborates with other UN agencies in the protection and strengthening of civic space. Furthermore, to achieve meaningful participation, UNDP applies participatory planning approaches (CPD para 29) and supports community-driven initiatives, with a particular focus on empowering women-led and marginalized groups through Output 3.2 of the CPD. At least 30 CSOs will be empowered to deliver inclusive services and promote inter-community trust-building. UNDP remains committed to fostering inclusive governance and welcomes continued dialogue with Germany and other partners on promoting civic space and community participation in Georgia. 	<ul style="list-style-type: none"> No changes have been made to the draft CPD; clarifications are provided in the Country Office response.
	<ul style="list-style-type: none"> II. 36. This area of work is seen as particularly important and pressing, given the recent developments in Georgia that have significantly shrunk the space for civil society organisations. We would like to understand, how UNDP plans to implement the capacity building of CSOs to monitor and advocate for justice and equality before the law. Key organisations in this area face 	<ul style="list-style-type: none"> UNDP acknowledges the comment and provides the following clarification: UNDP has continued its support to address the shrinking of civic space – including those working on rule of law – through UNDP projects and joint UN programming. Key findings in the evaluation (ICPE) of the past programme cycle included UNDP’s ability to adapt, leverage opportunities and foster partnerships at all levels. Adaptive 	<ul style="list-style-type: none"> No changes have been made to the draft CPD; clarifications are provided in the Country Office response.

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	<p>severe repressions including criminal prosecution and freezing of bank accounts.</p> <ul style="list-style-type: none"> III. 43. This paragraph does not name any risks associated with recent legislative changes and legalistic prosecution of civil society organisations, media outlets and opposition parties. Requirements for registration and/or approval by the Transparency Law, the Foreign Agents Registration Act and the changes in the Grant Law have significantly reduced the ability of civil society organisations to operate in Georgia and have created a lot of uncertainty and risks for donors and recipients alike. UNDP should address this risk in their CPD along with potential mitigation strategies. 	<p>management remains critical in the current context.</p> <ul style="list-style-type: none"> As outlined in CPD paragraph 36, UNDP will continue to strengthen the capacity of CSOs to advocate for justice, equality, and social inclusion, including through support to at least 30 CSOs delivering inclusive services. In line with CPD paragraphs 8, 43, and 44, UNDP recognizes the risks arising from the evolving political and legislative environment and will apply adaptive management, policy dialogue, and targeted programming to mitigate these challenges. UNDP acknowledges the comment and provides the following clarification: UNDP has identified the “reduction of the functional capacities of CSOs” (paragraph 43), as one of the main risks. Paragraph 8 also specifies that “changes in the legislative environment could impede the work of civil society and the media, and the essential contributions they make to Georgian democracy and society as a whole”. UNDP has, as mentioned above, continued its support to maintain and expand civic space through its projects and joint UN programming. A continuation of this is also included in the CPD, for example in Output 3.2 “Space maintained and expanded for inclusive inter-community trust building, and meaningful participation of diverse groups through civil society-driven initiatives.” The CPD provides a general description of risk management (paras 43 and 44). UNDP applies a comprehensive set of corporate tools to capture and manage such risks, including those arising from legislative and regulatory changes, and adjusts its programming as needed in close coordination with the Resident Coordinator and development partners. 	<ul style="list-style-type: none"> No changes have been made to the draft CPD; clarifications are provided in the Country Office response.
CANADA	<ul style="list-style-type: none"> The evolving human rights and democratic backsliding is acknowledged throughout documents, risk related to program cooperation does include restrictions in the 	<ul style="list-style-type: none"> UNDP appreciates Canada’s review of the CPD and the constructive feedback and welcomes any opportunity to discuss UNDP’s programme in more detail. 	<ul style="list-style-type: none"> No changes have been made to the draft CPD; clarifications are provided in the Country Office response.

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	<p>Georgian context, and there is a monitoring and evaluation section. Overall, however, it would be helpful to understand better how UNDP has managed these dynamics with the ruling party in the last few years and how they plan to manage them in the increasingly restrictive environment.</p>	<ul style="list-style-type: none"> • UNDP acknowledges the comment and provides the following clarification: One of the key findings in the ICPE was UNDP’s ability to adapt, leverage opportunities, and foster partnerships at all levels. UNDP will continue this approach navigating political and operational uncertainties, including through impartial policy dialogue, risk-informed programming, and close coordination with the UN Resident Coordinator’s Office and development partners. • UNDP applies its Enterprise Risk Management Framework (link) and maintains a regularly updated risk register (CPD paras 43–44), Mitigation strategies include adaptive management, contingency planning, legal and operational support to partners, and leveraging joint UN programming for collective advocacy and protection. 	
	<ul style="list-style-type: none"> • UNDP still plans to include various UN agencies and “traditional development partners... as far as circumstances allow”. Echoing the above question, how does UNDP plan to do this in the current environment? 	<ul style="list-style-type: none"> • UNDP acknowledges the comment and provides the following clarification: UNDP continues to enjoy a strong and trusted collaboration with traditional development partners, as reflected in the current partnership profile and pipeline. As outlined in CPD paragraph 17, UNDP will continue to engage in joint programming, policy dialogue, and coordination mechanisms under the UNSDCF, while adapting its approach to evolving political and operational conditions. • UNDP actively engages with all development partners, including through Ambassadorial Working Groups and Development Partners’ meetings, organised under the auspices of the UNRC and with other UN agencies. 	<ul style="list-style-type: none"> • No changes have been made to the draft CPD; clarifications are provided in the Country Office response.
	<ul style="list-style-type: none"> • UNDP will continue focusing on developing the capacity of Georgian CSOs to monitor and advocate for justice and equality before the law, environmental protection, and social inclusion. By strengthening the organizational capacity of CSOs, the programme will enhance their ability to lead confidence-building measures and to ensure 	<ul style="list-style-type: none"> • UNDP acknowledges the comment and provides the following clarification: UNDP will continue its balanced approach navigating political and operational uncertainties. Strengthening the organizational capacity of at least 30 CSOs includes tailored support for CSOs working in sensitive areas, with a focus on adaptive programming, risk-informed planning, and collaboration with other UN agencies to safeguard civic space and ensure continuity of engagement 	<ul style="list-style-type: none"> • No changes have been made to the draft CPD; clarifications are provided in the Country Office response.

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	<p>transparency, public accountability, and effective governance. Supporting CSOs in environmental governance will align their efforts with European Union and international standards, fostering a more resilient, sustainable future. By empowering a minimum of 30 CSOs to deliver inclusive services to disadvantaged populations, the initiative will promote greater equity and fair opportunities for women and men, address the needs of the most marginalized and contribute to the achievement of national targets, such as the National Human Rights Protection Strategy 2022-2030.</p> <ul style="list-style-type: none"> • Again, similar to the question above, we would welcome more details on how this will be done in the current environment. 	<p>despite the evolving context.</p>	
	<ul style="list-style-type: none"> • Prerequisite reforms for accession continue, focusing on the EU-Georgia Association Agreement and the Deep and Comprehensive Free Trade Area (DCFTA). We would, if possible, appreciate more details on this as Georgian government has said they are pausing negotiations until 2028. 	<ul style="list-style-type: none"> • The Government of Georgia has emphasised Georgia's integration into the European Union as a foreign policy priority over the past year. Progress in regard to the EU-Georgia Association Agreement has also been a stated priority by the Government. • UNDP continues its support to the reform process in Georgia, including those aligned with the EU accession process. Examples in the area of governance/rule of law include, for example, increasing equal access to legal aid, mediation, and environmental justice. In the area of economic development this includes strengthening the capacity of SMEs to meet standards for accessing the EU market, as well as introducing EU standards for air quality and circular economy. 	<ul style="list-style-type: none"> • No changes have been made to the draft CPD; clarifications are provided in the Country Office response.
	<ul style="list-style-type: none"> • The country programme aligns with the national priorities of Georgia, as confirmed by the Government of Georgia in joint United Nations consultations, to pursue sophisticated and innovative solutions to 	<ul style="list-style-type: none"> • UNDP continues its support to the reform process in Georgia, as mentioned above, including support to reforms aligned with the EU accession process as outlined in the Government Programme 2025–2028 (link) and reaffirmed by senior officials, Georgia remains committed to implementing the EU 	<ul style="list-style-type: none"> • No changes have been made to the draft CPD; clarifications are provided in the Country Office response.

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	<p>developmental challenges. UNDP will seek to support further European Union integration, an aspiration both specified in the Georgian Constitution and aligned with the SDGs. We would appreciate more information on this in the current Georgian context.</p>	<p>Association Agreement and DCFTA obligations, with the aim of fulfilling over 90% of these commitments by 2028. UNDP’s support includes assistance in areas such as governance, environmental standards, and economic competitiveness.</p>	
	<ul style="list-style-type: none"> To achieve outcome-level change, fostering diverse and strategic partnerships at both central and local levels will be crucial. Key stakeholders will include both duty-bearers and rights-holders, including the Government and public sector agencies at the central and local levels, such as the Public Defender’s Office, national rule of law institutions, oversight institutions, regional partners, CSOs, human and women’s rights activists, grassroots movements, the private sector, media, academia, and international organizations. Consistent with the points above, this is something we would welcome more information on in the current Georgian context. 	<ul style="list-style-type: none"> UNDP continues to engage closely with all partners – Government, civil society, private sector, and donors – in its programming in Georgia. In the current context, UNDP applies inclusive and adaptive approaches to ensure meaningful engagement with all stakeholders, including those operating in a constrained civic space, and works closely with the UN Resident Coordinator’s Office and other UN agencies to safeguard and expand civic participation. 	<ul style="list-style-type: none"> No changes have been made to the draft CPD; clarifications are provided in the Country Office response.
	<ul style="list-style-type: none"> Outcome 2 isn’t listed in the UNRC letter. Was an oversight or is there is a specific rationale for the omission? 	<ul style="list-style-type: none"> UNDP acknowledges the comment and provides the following clarification: UNDP contributes to three out of four UNSDCF outcomes, and hence Outcome 2 is not listed in UNRC letter. Other UN agencies will contribute to the second outcome: “Outcome 2: By 2030, people in Georgia enjoy improved learning outcomes, healthier lives and reduced vulnerabilities, supported by comprehensive social protection, thereby bridging the rural-urban divide.” 	<ul style="list-style-type: none"> No changes have been made to the draft CPD; clarifications are provided in the Country Office response.