

Crisis reports Pakistan

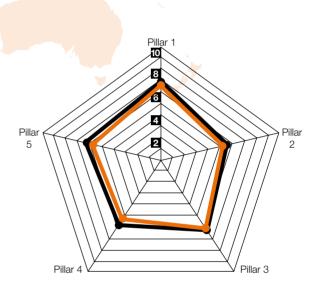
Pakistan at a glance

The crisis and the response

- Military operations against Islamic militants caused the world's largest displacement in over a decade: some 1.5 million IDPs have not returned.
- International engagement in the crisis response has been limited due to government access restrictions and UN security procedures.
- Military leadership of the response has created a dilemma: protest closure of humanitarian space or advocate for GHD Principles?
- The response has often not been transparently needsbased: entitlements have not reached many female-headed households and some communities branded as terrorist sympathisers.
- The government has downplayed the crisis and denied the applicability of international humanitarian law.
- The cluster system has been misused to allocate funds, rather than coordinate. Meetings have been time consuming and often unproductive.
- UN leadership has been disjointed: there are three senior officials with overlapping mandates.

Donor performance

- There was a 72 percent response to the revised Pakistan Humanitarian Response Plan 2008-2009. As of October 2010, the 2010 PHRP is only 46 percent covered, with poor responses for protection, WASH and agriculture.
- Many donors remain silent about human rights violations by state agents, coerced IDP returns and government reluctance to use established international humanitarian terminology.
- Donors generally follow Pakistani policy by refusing to fund national NGOs.
- The US and UK have funded non-transparent Pakistani military-led humanitarian and recovery operations.





HRI 2010 scores by pillar

Pillar 1 Responding to needs

Pillar 2 Prevention, risk reduction and recovery

Pillar 3 Working with humanitarian partners

Pillar 4 Protection and international law

Pillar 5 Learning and accountability

Key challenges and areas for improvement

- Donors must do more to collectively advocate for safe humanitarian access, protection of conflict-affected civilians and humanitarian workers.
- Donors need to understand the root causes of Islamic militancy, especially poor governance and landlessness.
 Generous support for early recovery – transparently delivered by civilian state actors – is imperative to secure local support for the War on Terror.
- Donors could play a role in forging development of guidelines for civil-military cooperation.

The international community generally accepts the need to reestablish Pakistani sovereignty and confront fundamentalists who grossly violate human rights, deny girls access to education and disrupt delivery of basic services by intimidating, murdering or expelling civil servants. However, the means by which this objective has been pursued has created unprecedented dilemmas for international actors.

Humanitarians do not generally find themselves forced to follow the rules of a strong, functioning state with a confident, professional and non-corrupt army. It has been hard to establish productive relationships between international nongovernmental organisations (INGOs), United Nations (UN) agencies and Pakistani civilian and military authorities and to provide assistance based on mutually-recognised humanitarian principles. The fact that the Pakistan army is simultaneously a military protagonist (bearing ultimate responsibility for triggering the largest humanitarian crisis in 2009), the key player in the response to it, the driver of most large-scale returns of IDPs as well as the gatekeeper generally blocking - but occasionally permitting - humanitarian access to zones of conflict has created ongoing dilemmas and controversies for donors and humanitarian agencies. There have been intense frustrations as humanitarians find themselves dealing with nominally "civilian" national and provincial government agencies, while the real decision-makers are military personnel. They have faced a conundrum: to observe the Principles of Good Humanitarian Donorship (GHD), and thus risk being denied operational access or expelled from the country, or to pragmatically tailor GHD Principles to the exigencies of the situation.

Pakistan

Donor dilemmas around response to conflict-induced displacement

During its second mission to Pakistan, the Humanitarian Response Index (HRI) team found the country at the foreground of the War on Terror. In April 2009, Pakistan suffered the world's largest and fastest displacement for over a decade as the army launched determined operations against Islamic militants which, in many cases, caused almost all civilian populations to flee. Between 2.7 million and three million Pashtuns were displaced (Internal Displacement Monitoring Centre 2010) in North West Frontier Province (NWFP) and the Federally Administered Tribal Areas (FATA) - the collective name for 13 administrative entitles - most of which abut the Pakistan-Afghanistan border and in which a number of Pakistani constitutional rights and justice procedures do not apply. Despite extensive return movements, there were still 1.5 conflict-induced internally displaced persons (IDPs) in July-August 2010 when - after the HRI mission - Pakistan was devastated by a flooding crisis of even greater magnitude. A further 3.7 million 'stayees' - those who did not flee military operations but who often suffered just as much as those who did - may require support for the restoration of critical services (OCHA 2010).

Many donors have remained quiescent with regard to human rights violations despite evidence that civilians have been caught between the abuses by the Taliban and the government's often indiscriminate and disproportionate military operations (Amnesty International 2010). They have generally not spoken publicly about the impunity enjoyed by government-recruited militias and the government's failure to "bring the region out of this human rights black hole and place the people of FATA under the protection of the law and constitution of Pakistan" (IRIN 2010).

Causes and patterns of displacement and return

The Pakistani military launched operations to oust fundamentalist groups, initially in Bajaur Agency in FATA in August 2008, and thereafter in Mohmand Agency. When the Pakistani government entered into a ceasefire agreement with the Tehrik-e-Taliban-e-Pakistan (TTP) in February 2009, under which it was agreed to enforce shari'a law in Swat, there was widespread concern both within Pakistan and abroad. It soon became clear that the TTP was trying to extend its reach beyond Swat, resulting in a decision in May 2009 to eliminate the militants and re-establish government control.

The approach in Swat and during subsequent offensives has been similar: to warn the local people of impending operations, to urge them to leave and in some cases to shepherd civilians onto army-provided lorries and buses and to then unleash aerial bombardment, artillery strikes and infantry attacks. There has been an implicit assumption that any males remaining in a conflict zone are "terrorists" or "miscreants".

Over 80 percent of IDPs have taken shelter with host families or rented accommodation (OCHA 2010). The concept of melmastia (hospitality) is, together with honour and revenge, a core tenet of paktunwali, the code of ethics governing relations among the estimated 40 million Pashtuns in Pakistan and Afghanistan. While there has been much reference in official Pakistani government statements to the "traditional hospitality" demonstrated by the host families, there are also many cultural complications to accepting it and the needs of host families have been generally ignored.

There have been substantial return movements but it is not clear if they have always been voluntary and sustainable. Those who have returned to NWFP and Bajour in northern FATA may see returning home or local integration in urban environments as their preferred solution. Further south in FATA, where IDPs have been pushed away from buffer border zones, tribal and religious tensions are important obstacles and could provoke secondary displacements. Proximity to the Afghan border and the firing of United States (US) drones into Pakistani territory is an impediment to return. The greatest concern expressed by those who have returned is further conflict. The limited field presence of the international community and lack of humanitarian and media access make it hard to evaluate difficulties facing returnees or stayees.

The decision to return has often been led by political or military considerations, as part of a state strategy to indicate the apparent conclusive nature of victory against militants. Decisions on closures of IDP camps have been taken in Islamabad while the humanitarian community was still in the process of drawing up operating procedures for camp closures. Interviewees confirmed to the HRI team the reports from the UN Humanitarian Country Team (HCT) and protection cluster that there have been consistent instances of camp closures that do not respect the principles of voluntary, informed, safe and dignified returns. Information on return or relocation options was not widely available and key consent forms were only in English. Camp authorities rushed or coerced IDPs into making decisions; and local authorities in some instances cut off camp utility supplies to pressure people to move on (Young 2010). The Pakistani army often coerced people onto trucks despite their misgivings and fears – which in many cases proved to be well-founded - that they would receive insufficient support on return and would confront ongoing insecurity. Major decisions around IDP entitlements have been made at the highest level of the federal government without the apparent engagement of designated agencies, or much, if any, consultation with the humanitarian community. Much advice from humanitarian actors not to rush return and to ensure it is voluntary has been ignored.

It is premature to speculate about durable solutions for those displaced. The displacement crisis in north-western Pakistan is ongoing, further localised conflict is likely to continue and government capacity to respond to displacement is now further limited by the flood crisis. People are still being displaced from, and within, areas across the region.

Government terminology blurs crisis and distorts response

The Pakistani military seeks to avoid mention of "conflict" or "crisis", depicts its offensives as "law enforcement operations" and denies the applicability of IHL. No government policy statement is based on the internationally-recognised Guiding Principles on Internal Displacement and the government does not generally refer to "displacement". The term "IDP" is widely used by the media, civil society, IDPs themselves and Pakistani charitable organisations. It is used informally by political and military leaders and is found in some government reports. However, the federal authorities and military generally use the official term "dislocated people" and occasionally "affectees". Pakistan has successfully insisted that the Guiding Principles are barely mentioned in joint government-UN documentation. Driven by their wider commitments to the War on Terror, few donors have publicly questioned the Pakistani government's approach and terminology, despite their formal adoption of GHD Principles. With their focus on "post-conflict recovery", major development donors echo government rhetoric that the conflict is over. As an example, the World Bank and the Asian Development Bank worked with the government to rapidly develop a Conflict Early Recovery Initial Needs Assessment (CERINA) in jihadiaffected areas (World Bank/Asian Development Bank 2009) despite the reality that conflict was ongoing.

National agencies responding to displacement

Throughout the history of Pakistan, the army has been seen as the only institution capable of holding the nation together. There has long been an expectation that military actors will automatically assume the leadership for the planning and implementation of major emergency responses to all kinds of disaster. The military's response to the 2005 earthquake was generally regarded as efficient and timely.

The international community was surprised that the emergency response agency established after the earthquake, the National Disaster Management Agency, was sidelined by the army/ federal government. Instead, in May 2009, the Prime Minister of Pakistan created a Special Support Group (SSG) to lead the emergency response to the displacement crisis. Officially, the SSG is headed by the Federal Minster for Information and Broadcasting, but dayto-day decision-making is undertaken by the general who led the response to the 2005 earthquake. The SSG's website highlights the military leadership of the response, noting that "the manner in which the IDP Management issue has been taken on by Special Support Group... has contributed positively to the overall Image Building of Pakistan internationally and Armed Forces of Pakistan internally thus accelerating the progress of winning the 'Hearts and Minds' of the affected population," (SSG 2010).

The National Database and Registration Authority (NADRA), a federal body responsible for issuing computerised National Identity Cards (CNICs) to Pakistani citizens, is mandated to register IDPs. Those seeking to become registered as IDPs need a CNIC. Many, particularly women and residents of isolated parts of FATA, did not have one prior to the crisis or lost it during flight. Criticisms have been levelled at NADRA for not doing more to ensure registration of female-headed households, people with disabilities and those perceived as enemies of the state because of their political or familial affiliation. The HRI team was informed that assistance was given to all members of some clans believed to be pro-government allies, regardless of their individual or household circumstances.

"You are damned if you do and damned if you don't."



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The government recognised that the primary need of IDPs was cash to pay for food, rent and utilities and that they were living in an urban environment with no shortage of cash machines and banks. After discussion with the UN, it was agreed to issue Smart Cards for NADRA-registered IDPs. There was quick uptake as cash was withdrawn, shopkeepers recognised them for a fee and middle-men started helping those unfamiliar with the technology. Against UN advice, a populist decision was made to load each card with 25,000 rupees (c. US\$300), substantially more than after the earthquake. This led both to some people claiming displacement status without due reason and to the government running out of funds. After 400,000 cards were issued, further IDP registration was then blocked without warning and only resumed on receipt of US funding. Newly-registered IDPs do not receive as much.

Pakistan has not only prevented access of international humanitarians and donors to conflict zones, but has discouraged engagement by non-approved Pakistani charitable societies, human rights organisations and the media. Many reported to the HRI team that most donors have followed this Pakistani policy by refusing to provide funding for national NGOs.

International donor response

Numerous INGOs, 25 UN agencies and the International Organisation for Migration operate in Pakistan. Despite this considerable presence, the international community's engagement in the response to those displaced by the armed conflict has not involved substantial direct field involvement. The UN's stringent security mechanisms, combined with government access restrictions, has greatly limited access to conflict zones and areas of return. The limited role of international humanitarian assistance reflects a lack of capacity and influence, exacerbated by controversy around the way in which humanitarian aid is perceived and disagreement among humanitarians on whether to engage and support government programmes or to primarily advocate for humanitarian principles (Humanitarian Policy Group 2009). Few of the international staff in humanitarian agencies have extensive experience working in Pakistan. Donors and the UN seem to lack analytical capacity to understand and address the root causes of displacement. A real-time evaluation (RTE) of the response commissioned by the Inter-Agency Standing Committee (IASC) concluded that the HCT was not "as effective a forum for leading the international humanitarian response as it should have been," (Cosgrave et al. 2010).

Traditionally, apart from the very extensive bilateral military cooperation, aid to Pakistan has been concentrated on development issues, much of it through budget support. The formal coordination mechanism has been the Pakistan Development Forum, which last met in 2007. At the federal level, the Pakistani government's priority remains traditional development assistance, in particular budget support, rather than humanitarian assistance.

Downplaying the extent of the displacement crisis, Pakistan was initially hesitant to work on an appeal with the UN. After difficult negotiations, a Pakistan Humanitarian Response Plan (PHRP) was approved, initially for six months, but later extended. By the end of December 2009, 72 percent of funds requested in the revised PHRP 2008-2009 had been obtained, the fourthhighest level of funding globally: US\$490 million against total PHRP requirements of US\$680 million. As of mid-September 2010, a further US\$188 million has been contributed to the displacement crisis response outside the PHRP, including through the Red Cross and Red Crescent Movement, Médecins sans Frontières (MSF) and a large number of other international NGOs. The major contributors to the PHRP have been the US (43.5 percent), the European Commission (7.9 percent), the United Arab Emirates 5.7 percent, Japan 4.7 percent, Germany 4.3 percent, Australia and Norway (both 3.2 percent). The United Kingdom (UK) – the former colonial power - contributed only 2.9 percent. The 3.3 percent provided by the Central Emergency Response Fund (CERF) proved invaluable in providing rapid funding for life-saving activities. Pakistan itself contributed 4.9 percent of the total.

There was markedly divergent response by sector. Nutrition was almost fully covered and camp coordination and camp management was 96 percent covered, but responses to early recovery, agriculture and education were only four, 19 and 36 percent respectively. This clearly indicates serious lack of appreciation of the importance of restoring livelihoods and failure to learn from experience elsewhere, demonstrating that such activities must start in parallel with the immediate provision of shelter and food aid. In August 2010, OCHA (2010) warned that "the vast majority of those not receiving support for restarting agricultural and non-agricultural livelihoods will find it difficult to identify new income sources or non-harmful ways of sustaining themselves and their families".

A number of Pakistan's leading donors, including the US and the UK, work with Pakistan's military on recovery and reconstruction projects in NWFP and FATA. The US and UK have developed a "non-kinetic stabilization" strategy for Malakand, the district which has seen the largest displacement (US State Department 2010). Funds provided by such interventions do not form part of donors' humanitarian budgets. They resemble Afghanistan/Iraq models of Provincial Reconstruction Teams, with the difference that activities in Pakistan are nationally-led. There is apparent tension within UK agencies - with the Department for International Development (DFID) reportedly not pleased with direct Ministry of Defence/ Foreign and Commonwealth Office assistance to the Pakistani military for "reconstruction".

Funding for the 2010 PHRP has fallen significantly behind needs and is now likely to be overshadowed by the August 2010 flood catastrophe. Launched in February 2010, it sought US\$538 million for the first six months of 2010, and the possibility of US\$254 million for the second half of 2010. By mid-September 2010, the PHRP had only been 44.6 percent covered, with only food (60 percent) and CCCM (60 percent) even half funded.

Non-OECD/DAC donors

As in other recent disaster contexts, the extent of funding provided by Gulf states is not readily quantified and pledges have not necessarily been honoured. Saudi Arabia pledged US\$100 million to the PHRP in October 2009 but up until the 2010 floods, discussions were still under way to turn this into an actual disbursement, with the HCT unsure how best to pressure Riyadh. Such inability to turn a pledge into a payment highlights the general difficulty in Pakistan, and elsewhere, of how to effectively and transparently engage with non-traditional donors.

Difficult choices for humanitarians

Whether to cooperate or to protest is a choice faced by most operational agencies genuinely committed to upholding *GHD Principles* in Pakistan. There are no easy answers. The representative of one INGO told the HRI team of the need for "pragmatic impartiality". Several INGOs reported "you are damned if you do and damned if you don't". Respondents reported that in general, "donors accepted conditions and limitations imposed... probably they didn't have any other option".

Some international humanitarians have expressed principled concerns about military closure of humanitarian space, while others argue the pragmatic need to align with the military agenda, despite apparent contradiction with core humanitarian principles. Humanitarian actors continue to debate the pros and cons of alignment and proximity with military actors. Oxfam has noted that "efforts to uphold and promote humanitarian principles (including the need to distinguish humanitarian action from military or political agendas) have suffered from a disjointed approach and the lack of a common strategy for engagement with government and other actors," (Bennett 2009). Despite their reservations about military intrusions into humanitarian space, there is often a grudging recognition among the UN and INGOs that they are more bureaucratic and sluggish as responders to displacement than the Pakistani army.

Cluster and coordination confusion

It is difficult, in a strong state such as Pakistan, for donors to combine development and humanitarian assistance while respecting the GHD Principles. It has not been easy for in-country donor staff to shift from long-standing development approaches to learning to respond to a massive sudden-onset humanitarian emergency. Donor and UN agencies' reliance on "surge capacity" resulted in the arrival of staff with little or no knowledge of the country, often to the annoyance of more experienced humanitarian workers with experience stretching back to the 2005 earthquake. Dependence on surge capacity led to frequent turnover of staff, as those provided under "surge" arrangements are often only available for short periods. Donors and UN agencies need to address this long-standing problem.

The swift re-establishment of a fullystaffed OCHA office in early 2009 was instrumental in ensuring rapid and regular compilation and dissemination of information. In the second quarter of 2009, the UN Under-Secretary-General for Humanitarian Affairs designated the United Nations Children's Fund (UNICEF) Representative in Pakistan as Humanitarian Coordinator (HC) to lead the response to the displacement crisis. In August 2009, the UN Secretary-General also appointed a Special Envoy (SE) for Assistance to Pakistan to "promote a strategic, coherent and comprehensive approach to supporting the humanitarian, recovery and reconstruction needs of crisis-affected areas."The UN asserts they work closely together but the Resident Coordinator (RC) and HC have little contact and the SE only comes to Pakistan occasionally. The SE's function seems uncertain as he has no Security Council mandate - to which Pakistan would not agree anyway. The designation of a separate HC and SE indicates how difficult it has been for the UN to promote a comprehensive response strategy and to mobilise funds. The complications arise from both the Pakistani government's desire to downplay any humanitarian issues and the UN's internal structure. The result - three senior officials with overlapping responsibilities - lacks clarity and efficiency. The future of this tripartite structure remains uncertain.

Many actors interviewed by the HRI team thought that an HC selected for the most significant new humanitarian crisis of 2009 should be able to devote all his efforts to the HC function and should not also be expected to continue to manage the large programme of a major development and humanitarian UN agency.

In response to the displacement crisis, donors established a fortnightly informal donor breakfast, hosted by different donors in turn, at which the HC, the head of OCHA and one or two other selected representatives of humanitarian implementing agencies briefed donors. The HRI team was informed that this mechanism was particularly useful for the smaller embassies.

The coordination mechanisms put in place following the earthquake in October 2005 included the first major trial of the cluster system (Street & Parihar 2007). This was reactivated for the PHRP in 2009. Twelve clusters have been created: agriculture, camp coordination and camp management, coordination, community restoration (elsewhere known as early recovery), education, emergency shelter, food aid, health, logistics support services, nutrition, protection, and water, sanitation and hygiene (WASH).

A number of problems with the cluster system were identified during the response to the earthquake and there continues to be dissatisfaction. Many expressed concern over the use of the cluster system to allocate funds, rather than just coordinate activities and coverage. This has led to the impression that funds do not reach all implementing agencies proportionately, with the UN cluster lead agencies' own programmes, and those of the well-established INGOs, receiving preferential funding. It seems that the cluster leads, rather than being the "funder of last resort" as foreseen in the cluster guidelines, have become the "channel of first resort". The International Rescue Committee has described the use of clusters to provide project funding as an "administratively dysfunctional" perversion of their intended function which has "exacerbated the worst kind of negative competition between humanitarian actors," (Young 2010). Humanitarian organisations also shared their frustration over the extensive amount of time it takes for funds allocated to NGOs through the cluster system to actually reach the implementing agency. Respondents also reported to the HRI team that there is a perception that in some cases, representatives of newly-arrived and non-experienced INGOs, enjoying strong donor political support, took up time at cluster meetings, distracting senior staff from major operational agencies from their duties. Others reported that too many issues were referred to the agency heads on the HCT for decision because those attending cluster meetings did not have the seniority, authority, or experience to ensure cluster members reached agreement.

Governance and mal-development

There seems to be limited understanding of the socio-political tensions and local power dynamics which helped give rise to Islamic militancy. NWFP/FATA will again become a sanctuary for insurgents unless the government and the international community address the underlying conditions of poverty, absence of state services, poor education and feudal control of land that allowed militancy to flourish. Many, if not most, Pakistani IDPs primarily regard themselves as Pashtuns, rather than Pakistani citizens. Delegimitisation of the authority of Islamic militants is not possible without programmes to develop national identity that recognise the contributions of all ethnic groups. The US military has acknowledged that imposing Western legal institutions on Pashtun communities. directed by a central government perceived as corrupt and dominated by non-Pashtuns, invites resistance (Haring 2010). Delivery of reconstruction aid through unaccountable local institutions not only limits aid effectiveness, but may also impede, rather than encourage, democratisation. A post-conflict recovery approach based on development-focused "business as usual" is not conducive to post-conflict stability.

The International Crisis Group (2009) argues that the greatest obstacle to durable solutions in FATA is malgovernance resulting from "shortsighted military policies and a colonialera body of law that isolates the region from the rest of the country, giving it an ambiguous constitutional status and denying political freedoms and economic opportunity to the population". In recent years, Taliban militants have murdered hundreds of tribal elders, destroying traditional forms of authority. The vacuum created by the militants and military offensives may lead to more sectarian violence. Extremist groups appear to be exploiting relief efforts to advance their agenda. Communities displaced by a poorly planned war may be especially vulnerable to jihadi indoctrination. Media coverage is tightly restricted but there have, nevertheless, been reports that returnees are frustrated, hearing themselves frequently praised as heroes by the government, yet still waiting for key services and livelihoods support (Hussain 2010).

Lessons learnt and recommendations for the future

Neither the government nor the international community are doing enough to protect and assist those caught up in the titanic struggle against Islamic fundamentalism in Pakistan. Pakistan needs a clear national policy and set of practices to safeguard the lives, basic rights, wellbeing, and livelihoods of the large number of civilians caught up in the armed struggle.

- 1 Humanitarian access and respect for IHL: Donor and humanitarian access to conflict and return areas is essential to verify the conditions of displacement and return. The government's main long-term development partners, particularly the US and UK, need to discuss humanitarian issues directly with the government, stop providing funds for military reconstruction and advocate for channelling of humanitarian relief through genuinely autonomous civil agencies. They must realise that "victory over terrorists" cannot be obtained by coerced IDP returns and military-driven hearts-andminds "reconstruction" projects.
- 2 Needs-based assistance: Donors should engage with the Pakistani authorities on the criteria and procedures by which those affected by the displacement crisis are registered by NADRA. Assistance should reach all those actually in need, specifically those who do not have, or have lost, their identity cards, families headed by women, and those from regions not officially "notified" as being affected by the conflict. Individuals from "loyal" tribes should only be eligible for assistance if they are shown to be personally in need.

- 3 Civil military code of conduct needed: Many argue that popular support for the struggle against extremism hinges on asserting accountable civilian control over counter-insurgency policy, relief and reconstruction. Humanitarians would like a joint understanding between the Pakistani military, provincial and federal authorities, Pakistani NGOs, donors and international humanitarian agencies specifying how the international community can work with Pakistani authorities and civil society to protect the lives, rights, and livelihoods of civilians. Humanitarian INGOs and the HCT have started to develop a set of Basic Operating Rules, akin to the Basic Operating Guidelines - a set of benchmarks issued by the UN and development and humanitarian agencies - which proved useful during the conflict in Nepal between the former royalist government and Maoist insurgents. These need to be finalised and donors should subsequently pressure the government to accept and conform to them.
- 4 Early recovery: It is vitally important that the early recovery clusters which were woefully underfunded in the PHRP 2009 are better funded in the PHRP 2010.
- 5 Addressing cluster system inadequacies: Cluster lead responsibilities in a crisis of this scale, cannot be met by simply adding to the workloads of existing staff. The cluster approach can only work if agencies have additional senior staff with the time, authority, experience and personal skills to understand the issues and prepare and chair meetings. Cluster heads have to be seen as acting in the interests of the vulnerable, not their own agency.
- 6 Clearer UN and donor strategy: Donors, together with the HCT, need to act on a significant recommendation made by the IASC RTE: to "develop an active strategy of humanitarian diplomacy to work toward a more principled approach and a less constrained humanitarian space in Pakistan, including putting the issue on the agenda for donors," (Cosgrave et al. 2010).

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