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Theorizing Development Challenges in the Syrian Refugee Response in Jordan: Interests, Management, and Accountability

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Abstract. This article examines structural challenges to the implementation of development policy and programming in the Syrian refugee response in Jordan. Although international and local stakeholders have increasingly sought to turn the "refugee crisis" in Jordan into a "development opportunity," development interventions have often failed to empower beneficiaries in general and Syrian refugees in particular. Drawing on fieldwork conducted in Jordan over a total of five months between 2017-2020, this article identifies three dynamics of the international response that have limited the impact of development programs: the diversity of actors and interests, a lack of local management, and "upward" accountability to donors.

Keywords: *Jordan, Syrian refugee crisis, Jordan Compact, Development*

Over the past decade, the entanglement of development practices and displacement management has been reaffirmed in a series of multilateral initiatives, including the World Humanitarian Summit in 2015, the New York Declaration for Refugees and Migrants in 2016, and the Global Compact on Refugees in 2018 (Gabiam 2016). While development has introduced new ways of channeling aid and working towards refugee and host community resilience, it has also brought a new set of challenges that risk compromising refugee responses in general and refugee protection in particular (Zetter 2019). In this context, this article looks to the Syrian refugee response in Jordan to examine how development-based refugee policy has affected refugee and host community beneficiaries. Accounting for more than 6.7 million internally displaced persons and 5.6 million refugees worldwide (UNHCR 2020), the Syrian refugee crisis has played a decisive role in placing development on the top of the global refugee agenda from 2011 onwards. Although international and local stakeholders have increasingly sought to turn the "refugee crisis" in Jordan into a "development opportunity," refugee and host community empowerment has been restricted by a series of structural challenges within the refugee regime. In particular, this article identifies three dynamics of the international response that have limited the impact of development programs: the diversity of actors and interests, a lack of local management, and "upward" accountability to donors.

This article draws on fieldwork conducted in Jordan over a total of five months between 2017-2020. The data primarily consists of approximately twenty-five semi-structured interviews in English with NGO workers and donor and government representatives, as well as thirty-five interviews in Arabic with Syrian refugees. A majority interviewees were identified using a snowball technique, although some donors and NGO workers were specifically contacted based on their knowledge of certain policy areas. Most meetings took place in Amman and Irbid, but approximately ten interviews were conducted over Skype. Interviews were either recorded—when appropriate—or posteriorly transcribed from memory and stored on a password protected device. The data was then analyzed using theoretical sampling. In general, identifying information has been kept to a minimum to protect interlocutors. In addition to ethnographic data, this article also relies on close readings of NGO reports and donor and government statements, as well as secondary and grey literature on refugee policy in Jordan.

1. The Syrian Refugee Response in Jordan

With the second-highest number of Syrians per capita, Jordan today hosts more than 650,000 Syrians (ibid) and has served as a key site for experimenting with a humanitarian-development nexus approach to displacement management. Since the beginning of the Syrian refugee crisis in 2011, the refugee response in Jordan has undergone a dramatic shift, transforming from a short-term humanitarian mission into a long-term, multifaceted development enterprise. During the first years of the refugee crisis, the international response was led by UNHCR and a limited number of international organizations. As a reaction to the acute needs of Syrian refugees, these actors emphasized the need for emergency relief and protection, including "the registration and documentation of new arrivals, basic protection, and life-saving activities" (UN 2013, 138). By 2014, however, the Government of Jordan (GoJ) was becoming increasingly anxious about what a prolonged refugee crisis would mean for the Jordanian host community and began to assert more influence over the international response. In local media and public discourse, the Syrian crisis was construed as a "burden" on the Jordanian people, both in terms of economic stability and political security. To better manage this refugee "burden," Jordan launched the 2015 Jordan Response Plan (JRP) for the Syria crisis. The plan highlighted that the Syria crisis "cannot be mitigated through the [humanitarian] sector interventions,"

and pushed for a long-term development approach that would "embed the refugee response into national development plans" (GoJ 2014, 6-8).

The GoJ was not the only actor advocating for a development-based refugee response at the time. As more and more Syrians were crossing the Mediterranean in the spring of 2015, European states were becoming increasingly anxious over the alarming numbers of "migrants." To ensure the containment of Syrians in their region of origin soon, EU policy makers turned to the idea of development and resilience-strengthening (Anholt and Sinatti 2019). Here, the argument was that Syrians could be incentivized to remain in Jordan, Turkey, and Lebanon if the EU could help improve their economic situation in the host country. Similarly, international NGOs and refugee scholars were pointing out the need for more long-term planning as the Syria crisis was becoming increasingly protracted. In an article published in *Foreign Affairs* in October 2015, development economists Paul Collier and Alexander Betts argued for the need to transition into a development-based response that would "improve the lives of the refugees in the short term and the prospects of the region in the long term" (2015, n.p.)

In early 2016, the intersecting interests of the GoJ, the EU, and the humanitarian-development community led to the drafting of the "Jordan Compact," a multilateral policy agreement that promised to "[turn] the Syrian refugee crisis into a development opportunity" (GoJ 2016b, n.p.). The Compact introduced new forms of thinking, financing, and programming the Syrian refugee response in Jordan, with development as the central priority. In addition to a 1.7 billion aid package—the majority of which was to directly support the GoJ budget and host community "resilience"—it specified a series of initiatives to be implemented in the upcoming years (ibid). To stimulate economic growth and create new jobs, the EU acceded to simplify its Rules of Origin (RoO) in the hope that this would enable a larger number of Jordanian factories to benefit from duty-free export to European markets (European Council 2016, 10). The revised EU-Jordan trade agreement was to be implemented in 18 designated special economic zones (SEZs) and industrial areas in Jordan and promised to increase exports and create thousands of new jobs. To ensure that Syrians would receive its fair share of these economic opportunities, factories in the SEZs had to hire a 15% quota of Syrian workers to enjoy the preferential benefits of the new trade agreements (ibid).

As part of the Jordan Compact, stakeholders also agreed to launch a new initiative to increase refugee access to education and employment. Under the

"Accelerating Access to Quality Formal Education" plan, $181,196,240 was allocated to "formal education for refugees in both camps and host communities" and $52,273,000 to "provide vulnerable youth with access to tertiary/higher education opportunities" (GoJ 2016a, 20; 25). The hope was that 272,800 Syrian youth and children would be enrolled in some form of education by 2018. In terms of employment, the GoJ agreed to create 200,000 formal work opportunities for Syrian refugees and provide them with legal work permits (GoJ 2016b, n.p.). Moreover, millions of dollars were allocated to livelihood development programming, including $46,182,117 to "demand-based vocational training, job-matching, and apprenticeship" and $28,902,027 to "start-up support [such as] entrepreneurship development promoting innovative ideas" (GoJ 2016a, 101-102; 106). These programs were meant to lead to "permanent employment creation," either by connecting beneficiaries to existing jobs or by providing the skills to start their own business.

2. A Lack of Development Impact

Since the Jordan Compact was first issued four years ago, it has been expanded and reaffirmed in a series of conferences held in Brussels and hosted by the EU, first in April 2017 and later in April 2018 and March 2019. Nevertheless, despite the support and funding available for development programs in the Syrian refugee response, the impact of these initiatives has been limited, not just for refugee beneficiaries but also the host community and the Jordanian economy. According to the official monitoring and assessment framework developed by UK-based consultancy firm Agulhas, the outcomes of the Jordan Compact have been "mixed," with stagnant economic growth, high unemployment, and low levels of additional exports and jobs created (Agulhas 2019, 10). In a 2019 report, Agulhas noted that the Jordanian labor market is characterized by "high levels of informality and declining working conditions in some sectors for both Syrians and Jordanians" and that "educational outcomes remain low by international standards" (ibid). As for the new EU-Jordan trade agreement, this has only led to increased exports by €19.2 million and the creation of a maximum of thousand jobs (Ibid, 15). Similarly, UNHCR data indicates that the turn to a development-oriented response has not led to socio-economic empowerment for Syrian refugees. Between 2016 and 2019, the percentage of Syrians refugees in Jordan living below the poverty threshold

(approximately $3 per day) remained stagnant around 80-85%.[1] In fact, some reports suggest that a development-based approach has negatively affected refugee welfare. According to a study published in December 2018, household income has decreased for almost half of all Syrians since 2016 (Tiltnes et al. 2019, 4).

In many ways, the limited impact of development can be attributed to a lack of contextualized policy and programs. Scholars of development have long emphasized the inability of technocratic development interventions to address the complex challenges posed by local environments (E.g. Mosse 2004; Brohman 1996). As policy makers and program managers often rely on normative and/or ideal models for economic interventions, they risk falling into what Lavagnon Ika (2012) has called a "one-size-fits-all trap." In the context of the Syrian refugee response in Jordan, Katharina Lenner and Lewis Turner have argued policy makers have "neglected core features of Jordan's political economy and labor market" (2018, 65). With regard to the new EU-Jordan trade agreement, for example, the failure to increase exports was largely a result of policy makers' lack of understanding of stakeholder interest and capacities. Jordanian exporters found it challenging from primarily Arab to EU market and were unable to substitute South Asian and Egyptian migrant labor and fill the quota for Syrian employment (Agulhas 2019; JCI Researcher, Interview, 2018). As for EU importers, most were unwilling to accept the quality of Jordanian products produced in the SEZs (Senior Technician 1, Interview, 2020).

Similar issues have appeared in access-oriented employment and education initiatives. Despite efforts to facilitate Syrian formal work since 2016 onwards, over two-thirds of all Syrian workers lacked a work permit by the beginning of 2019 (Tiltnes et al. 2019, 114). The high percentage of informal labor can be explained by the fact that work formalization programs have not adequately catered to the needs of Syrian workers. While many Syrians are working informally or looking for employment in semi-skilled or high-skilled sectors, work permits have only been made available for low-skilled professions (See Lenner and Turner 2018, 66; and Razzaz 2017). As for access to education, development initiatives have had a limited impact on Syrian children largely because of the failure to tackle the root causes for missed schooling, including financial precarity and child labor (Carlier 2018, 13; HRW

[1] C.f. UNHCR 2019a, 10; and GoJ 2016a, 14. A review of UNHCR data shows that this number has largely remained between 80-85% over time, with some fluctuations.

2018; Syrian Refugee 3, Interview, 2018). This is particularly true for older children, who are often forced to drop out of school to support their family financially; today only 48% of Syrian 15-year-olds and 15% of 16-year-olds are enrolled in formal education (Agulhas 2019, 19). In this context, Cindy Huang and Kate Gough have pointed out that development policy makers have "failed to prioritize policies and programs that fit the local context and met the needs of refugee and host populations" (2019, n.p).

3. Structural Challenges in the Refugee Response

The failure of development policy and programs to address beneficiary needs is largely a result of structural challenges in the Syrian refugee response in Jordan. As the refugee response has become increasingly development-oriented, it has witnessed a growing number of set, implementing partners, and financing instruments. These trends have contributed to a set of dynamics that have negatively affected the impact of development, particularly with regard to Syrian refugees.

Diversity of actors and interests

As the number of actors involved in the Syrian refugee response in Jordan has grown rapidly over the past nine years, policy and programs have increasingly detached from the needs of Syrian refugees due to a geopoliticization of humanitarian and development agendas. In particular, the growing influence of the GoJ and the EU has pushed refugee rights and protection to the margin in favor of a refugee response that caters to the geopolitical interests of EU Member States and the Jordanian host community. On a policy level, this is evident in the limited refugee provisions of the Jordan Compact. Although the Compact theoretically promised "a new paradigm" for refugee empowerment, refugee interests were far from central to stakeholders during drafting and negotiations (Anholt and Sinatti 2019). This is perhaps most clear in the way in which the EU and the GoJ circumvented the question of refugee rights and a "durable solution" in the form of resettlement or permanent integration (Burlin 2019). While a durable solution is paramount to long-term refugee empowerment, it was discarded on a basis of political cost (ibid). In this context, Rawan Arar (2017) has argued that the Jordan Compact should first and foremost be it seen as a geopolitical "compromise" that structures the burden-sharing between Western/European donors and the GoJ.

When development has been invoked as a tool to temporarily increase the "resilience" of Syrians, this approach has been implemented in such a way as to not compromise the interests of political stakeholders. In the case of Syrian economic empowerment, for instance, the Jordan Compact limited development interventions through several caveats, including a requirement to consider "prevailing laws and regulations" and "the level of international support" (GoJ 2016b, n.p.). On a programmatic level, the GoJ has for instance restricted Syrian formal employment to certain low-skilled sectors—primarily agriculture, construction, manufacturing, and food services (ILO 2017). These restrictions have been put in place by the government in an attempt to avoid competition for high-skilled jobs between Syrians and Jordanians, thus protecting the interest of the domestic workforce and avoiding the potential political backlash from giving Syrian the (full) right to work (Buffoni, Interview, 2018). Similarly, geopolitical interests have impacted development programming in Jordanian refugee camps. In her study of Za'atari camp, Suraina Pasha has noted that the discourse of refugee resilience and empowerment has first and foremost been engaged to reflect "the economic and political priorities of the GoJ" (2020, 256). In response to domestic interest, the GoJ has limited economic development opportunities in the camp by, inter alia, reducing electricity supplies, cutting off access to raw supplies outside camp, and implementing a "quasi-carceral" governance structure. In this way, the geopoliticization of the refugee response has sometimes shaped development policy and programming to the detriment of refugee protection.

Moreover, the diversity of actors and interests in the refugee response has resulted in the prioritization of congenial, "quick-fix" solutions that harmonize conflicting policy objectives, even when these have been shown to lack feasibility (Lenner and Turner 2018). For instance, according to several senior technicians involved in the design of the Jordan Compact, concerns were raised early on regarding the feasibility of the new EU-Jordan trade agreement and its implementation in the SEZs. One of them recalled how preliminary assessments showed that the SEZ initiative was "unfeasible" both because of a lack of export capacity amongst Jordanian factories and because the difficult working conditions in the SEZs would not attract Syrian and Jordanian workers (Senior Technician 2, Interview, 2020). Although theses problem were brought up by technicians "again and again," high-level policy makers insisted on going through with the program because it "fitted the purpose" of reaching a policy compromise (ibid). This account

was corroborated by another technician, who recalled (Senior Technician 1, Interview, 2020):

> "When we began developing the Compact, this was after [Alan Kurdie] was found on the shore of the Turkish beach. This event created a lot of pressure on the EU to keep Syrian refugees in the region. So we [technicians] were put under a lot of pressure to find solutions. We started developing the SEZ concept with a lot of difficulty. The GoJ wanted the RoO relaxation, so the EU said, we will give this to you if you allow Syrian refugees to work in the SEZ... But from an economic point of view, everyone who looked at the proposal came to the conclusion that it did not make sense. When we raised this to the political people, we were smashed… For them, politically it was very important that it happened. The EU needed to prove that they were doing something for Syrians and something for Jordanians to keep the Syrians in the country, and the GoJ wanted the new RoO."

During the negotiations of the SEZ initiative, the need to quickly agree upon a shared policy framework meant that preliminary critiques and red flags were silenced. In this way, geopolitical interests have also prevented the finetuning of development policy and programming.

Foreign management

As the number of actors involved in the Syrian refugee response has increased over time, donors and NGOs have consistently favored foreign management of non-governmental development programs. The dominance of international staff and managers has sometimes resulted in a lack of project contextualization and limited the impact of programs for Syrian and Jordanian beneficiaries. Although many international NGOs have operated in Jordan since the early 2000s, the quick turn-over of staff—especially on a managerial level—has meant that most management positions are today held by humanitarian and development workers without previous experience working in the region. Moreover, many organizations involved in the Syrian refugee response have only arrived in Jordan recently, including NRC (est. 2012), Acted (es.t 2012), Medair (est. 2012), and Plan International (est. 2015). The growing scale of the Syria operation has also meant that most international NGOs have significantly expanded their operations and hired new staff for positions related to the design, implementation, and evaluation of humanitarian and development programs. For instance, between 2012

and 2019, the number of international and national staff employed by UNHCR increased from 100 to 557 (c.f. UNHCR 2019b; and UNHCR 2012). During the same period, NRC created over 580 new positions in Jordan (NRC 2019). While many new positions have been allocated to national staff, managerial positions have mostly been assigned to foreigners whereas Jordanians (and Syrians) have typically been hired for "low-level" officer positions where they have limited influence on decision-making (Farah 2019, 28).

A lack of management localization is also apparent in the contracting of local organizations. Although local partnerships and participatory decision-making have been emphasized in a range of multilateral commitments and regional and local policy frameworks over the past decade (including the 2016 WHS and the UN Regional Refugee & Resilience Plans for the Syria Crisis), donors and international NGOs involved in the Syrian refugee response have often been reluctant to enter into contracts with local NGOs and community-based organizations (CBOs). For instance, one of the main financing tools of the Jordan Compact—the EU Madad Trust Fund—has primarily allocated grants to different consortia of international NGOs. As of March 2020, the Trust Fund has contracted thirty-two projects operating in Jordan.[2] Out of these, not a single project is led by a national NGO, and only three projects have national NGOs as "associated partners." However, in line with the prioritization of government budget support discussed above, four projects in the public education sector are led by governmental agencies. This pattern is not unique to the EU Madad Trust Fund, but can be discerned amongst most major international donor agencies and financing instruments. In a survey of seventy-four development projects in Jordan funded by the Canadian Department of Foreign Affairs since 2013 onwards, not a single one listed a local NGO as an implementing partners (although six projects were conducted in partnership with the GoJ).[3] A similar survey of ten development projects funded by the UK Department for International Development (DFID) in Jordan showed that only one listed a local NGO as an implementing partner.[4]

[2] Data available from: https://ec.europa.eu/trustfund-syria-region/content/state-play_en (accessed March 23, 2020).
[3] Data available from: https://w05.international.gc.ca/projectbrowser-banqueprojets/filter-filtre (accessed March 23, 2020).
[4] Data available from: https://devtracker.dfid.gov.uk/countries/JO/projects (accessed March 23, 2020).

In part, the failure to localize non-governmental development programs can be attributed to the limited institutional capacity of local NGOs. According to one EU official, the primary challenge for localization of the EU Madad Trust Fund has been the mobilization of large amount of capital in a very short time (EU Official, Interview, 2020):

> "In the beginning, the idea of the Trust Fund was really to get the money quickly to projects to make sure that we are supporting the refugees as much as possible. It was really, "out, out with the projects, we have to secure the delivery," and it was a lot of economy-of-scale. Because we were few staff members, we put the work burden on consortia of implementing organizations so that they could cooperate and make sure all works. Rather than us sitting with seven different contracts, we signed one contract. We told those seven organizations, "now you fix this." But the challenge has been to find absorption capacity and outreach amongst local actors. Today we have eighty-five contracts of a value om €1.9bn, so the projects are enormous and only few local actors can take those kind of contracts."

Nevertheless, other factors have also limited the involvement local NGOs in the development response. As one World Bank official noted, the idea of "nexus work" is a relatively new concept to national NGOs in Jordan, many who are used to working primarily in humanitarian contexts (WB Official, Interview, 2020). Unfamiliarity with nexus language means that these organizations are often unable to draft project proposals that adequately cater to the formats required by international donors.

When local actors are included in the Syrian refugee response in Jordan, they typically lack influence over the design of humanitarian and development programs. According to a 2019 report on the localization of aid in Jordan and Lebanon, "international NGOs are still reluctant to share decision-making power regarding project allocation, location, beneficiaries and budget allocation [with] local NGOs" (Bruschini-Chaumet et al. 2019, 5). By excluding local actors in the design and implementation of development programs, international stakeholders have missed a valuable opportunity to take advantage of their knowledge to better tailor their development programs to the local context and the needs of Jordanian and Syrian beneficiaries. This can be seen in the context of gender, where commentators and scholars have emphasized the limited impact of international NGO programming that relies on "western assumptions" of female empowerment. Laura Buffoni (2018), for instance, has argued that that gender mainstreaming in livelihood has not adequately accounted for cultural norms of Syrian and Jordanian women, including

the preference of working from home. This sense of decontextualization is also present amongst Syrians and Jordanians. One Syrian refugee volunteering with an international NGO described how the emphasis placed on female livelihoods is at odds with the priorities of most refugees: "Okay, you can focus on getting women jobs, but this should come after that of men. Today most Syrian men don't work! Will the wives go to work while the husbands stay at home? No, surely we need to get men work first" (Syrian Refugee 1, Interview, 2018).

Upward accountability

Although the turn to development in the Syrian refugee response has introduced new ways of financing humanitarian and development programming, donors have often retained an accountability structure that favors "upward" accountability to donors and senior management rather than "downward" accountability to refugees and host community beneficiaries, thereby limiting program impact. As described by Susan Robert et al., "it is increasingly the case that in order to be eligible for project funds, NGO staff must demonstrate that they understand and apply management practices in line with those employed by their donor agencies" (2005, 1849). In Jordan, international development donors typically appraise programs according to quantifiable "targets." The WBG, for instance, relies on a Program-for-Results financing (PforR) format, which "link[s] disbursement of funds directly to the achievement of specific program results" (WB 2020, n.p.). Similarly, DFID requires NGO to submit proposals according to a "Business Case" format, emphasizing that organizations should "quantify and value benefits" and create a "delivery trajectory" with "expected milestones and targets." (DFID 2011, 16; 30). Although targets can theoretically take multiple forms, several project managers in Jordan noted that donors have a preference for a quantifying targets in terms of the number of beneficiaries, what one NGO worker described as a "game of numbers" (Jordanian NGO Worker 1, Interview, 2018). Considering the fierce competition between NGOs in attracting development funding, project managers are often pressured to maximize the number of beneficiaries in order to receive a continuous stream of funds. Indeed, organizations are always prioritizing "a high number of beneficiaries" since "this is what the donors want" (ibid).

The "game of numbers" has had a significant influence over the types of non-governmental development programming that have proliferated in the Syrian

refugee response. As one project manager explained, it has particularly contributed to the rise of projects related to "supply-side interventions," such as entrepreneurial sewing courses, carpentry workshops, and hair and make-up classes (International NGO Worker 1, Interview, 2018). Although there are several reasons for the popularity of these kind of development programs in Jordan—including the "ease of implementation"—they are often deemed as particularly attractive due to their ability to "absorb a high numbers of beneficiaries" (ibid). As donor interest livelihood programming has grown substantially in the past four years, it has become increasingly easy to get funding for the implementation of small-scale vocational training programs, such "a three-week or four-week graphic design training" (ibid). Considering that NGOs are able to "take a bunch of different people every time," these types of development programs could reach hundreds of beneficiaries and quickly boost the organizations' impact statistics (ibid).

While the number of beneficiaries speaks to impact scale, it says little about the impact quality. Although supply-side interventions and vocational trainings might provide participants with new skills and experiences in the short-term, they have largely been unsuccessful at provide long-term employment (Kumar et al. 2018, xvii). This is particularly so for Syrian refugees. Largely due to legal restrictions on non-Jordanian labor (see above), many Syrians are unable to leverage vocational trainings to enter the formal labor market (Kumar et al. 2018; International NGO Worker 2, Interview, 2019). In this context, development scholars have pointed out how an emphasis on short-term quantitative targets can sustain ineffective programming by circumventing "costly" Monitoring and Evaluation (M&E) exercises and distorting accountability to beneficiaries (Easterly 2002; Edwards and Hulme 1996). In Jordan, the absence of long-term M&E has meant that some NGOs have continued implementing supply-side livelihood programs despite a lack of sustainable impact. As one NGO worker explained, organizations "are not bound to severe evaluation standards once [they] implement these training sessions" and therefore do it as "a way to fill in the [funding] gaps" (International NGO Worker 1, Interview, 2018).

A lack of downward accountability has also limited the impact of non-governmental development programming in the SEZs. Following the realization that Jordanian factories faced difficulties in employing Syrian refugees in the SEZs, several NGOs received funds to administer job training programs connecting Syrians and factory owners, including the Deutsche Gesellschaft für Internationale

Zusammenarbeit (GIZ). Nevertheless, according to several NGO workers, many of these programs were unable to creating long-term employment. As one local livelihoods officer explained (Jordanian NGO Worker 2, Interview, 2018):

> "What happened was that when NGOs got the money [for the job training projects] they have a target [for the project outcomes]. They want to achieve their targets. Let's say that I am an NGO and I have a target of putting three hundred people into jobs and to ensure that these people return to their jobs for three months… So, what happens is that after three months the NGO will kick people out basically to replace them with other people who will be unique number for the records… And for the factories this is great, since they get three more months of free labor. But for the participants, they are unable to find a permanent job."

As this account shows, the NGOs implementing job training programs received funding tied to "target outcomes." Due to upward accountability to donors, however, project managers were pushed to prioritize "unique numbers" rather than the long-term employment of a smaller number of participants.

4. Conclusion

During the past eight years, the Syrian refugee response has increasingly looked to development as a tool to tackle the "refugee burden" in host countries and contain Syrians in the region. In Jordan, development-based refugee policy has entailed a wide set of practices, ranging from macroeconomic interventions meant to increase export, through access-oriented initiatives in the education and livelihoods sector, to various forms of vocational and entrepreneurship trainings. Nevertheless, humanitarian and development actors have struggled to design policies and programs that speak to the needs of local beneficiaries in general and Syrians refugees in particular. This article has identified three structural challenges of the Syrian refugee response that have limited the impact of development initiatives. First, the growing number of actors have led to a geopoliticization of humanitarian and development agendas and the prioritization of congenial, "quick-fix" solutions, pushing beneficiary interests and program feasibility to the margin. Second, the dominance of foreign management has limited localization of non-governmental development programs and sometimes resulted in a lack of effective and contextualized policy and programming. Third, although development has mobilized new funds and financing instruments, donors have retained "upward"

accountability structures that emphasize short-term quantifiable targets—particularly in the form of beneficiary numbers—at the expense of programs with a long-term, sustainable impact. However, considering the limited data utilized by this article, more research is needed to further analyze how these dynamics affect the refugee response.

As development is become an increasingly important aspect of global refugee regime, it brings a range of new opportunities for strengthening refugee responses. In Jordan, development-based refugee policy has mobilized massive amounts of aid and introduced a wide range of new actors, financial instruments, and management techniques. It has helped mitigate donor-fatigue, highlighted host community needs, and forced stakeholders to plan beyond an "emergency" response. Nevertheless, development also brings a new set of challenges. Today, the Syrian refugee response is larger, multisectoral, and nexus-oriented, but also more bureaucratized, politicized, and corporatized. In this context, Syrians themselves are aware that their rights and protection have become far from the the only priority of international and local NGOs. Indeed, many of them experience that humanitarian and development industry often stands in direct opposition to their own interests. According to one Syrian man: "Development organizations have two faces. The face of humanitarianism and the face of the killer (*humme be wajheyn, al-wajh al-insaanee wa wajh al-qaatil*). [They] will pretend to care about Syrians, but only to get the money. To them, this is business, not humanitarianism" (Syrian Refugee 2, Interview, 2018).

Moving forward , there is a need for all stakeholders within the Syrian refugee response to revisit the way in which development has hitherto been mobilized in Jordan in general and the continued disempowerment of Syrian refugees in particular. While the international community should certainly continue supporting the GoJ and the Jordanian host community, the protection of Syrian refugees cannot remain marginal to the response agenda. In addition to facilitating durable solutions—both in terms of resettlement and integration—there is a need for donors and implementing agencies to transition towards increased "downward" accountability in humanitarian and development programming and prioritize feasible, localized, and sustainable programs with long-term impact for Syrians and Jordanians alike.

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