

June 7, 2013

Response from IBRD on Approved by Mail: Bangladesh: Coastal Embankment Improvement Project (CEIP)

Dear Andrea,

Following the approval of the above-mentioned project by the PPCR Sub-Committee and the comments received, please find attached a response matrix from IBRD.

Grateful if this can be posted on the Bangladesh page of the CIF website.

Many thanks,

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Coastal Embankment Improvement Project (Phase-I P128276)

PPCR Sub Committee Approval, Review & Team Responses

Summary matrix

June 6, 2013

Comments were received from the UK, Australia and Germany/Spain.

	Comments	Team Response
Joint Spanish and German		
1	<p>Main natural disasters in Bangladesh include flooding and storms. Therefore, we would like to commend all involved parties for submitting a project proposal to strengthening and upgrading embankments to improve the polder system in Bangladesh’s coastal area. Against this backdrop the project development objectives, (a) increase the area protected in selected polders from tidal flooding and frequent storm surges; (b) improve agricultural production by reducing saline water intrusion in selected polders; and (c) improve the Government of Bangladesh’s capacity to respond promptly and effectively to an eligible crisis or emergency, constitute a suitable approach for Bangladesh. We have no major objections to the implementation of the project. We however would like to see our recommendations (see bold highlights below) incorporated during project implementation.</p>	Thank you.
2	<p>Individual Comments on the Proposed Project</p> <p>According to the project document, the goals and targets of the project are based on and aligned with the national strategies, especially those included in the Sixth Five Year Plan 2011-15 and the Bangladesh Climate Change Strategy and Action Plan.</p> <p>The amount of actors and activities in the field of climate change, environment and disaster preparedness has increased tremendously during the last decade in Bangladesh. This development is surely justified by the high vulnerability of the country to climate change and variability as well as natural disasters.</p> <p>The evolvement of activities and new funding patterns in this sector demands well established coordination mechanisms. We would like to draw special attention to the already established <i>Bangladesh Climate Change Trust Fund</i> (BCCTF) and the <i>Bangladesh Climate Change Resilience Fund</i> (BCCRF). These funding schemes are considered as being the main vehicles in addressing the challenges related to climate change in the country. Surprisingly, neither of these two funds is mentioned in the project proposal.</p> <p>A number of projects of the BCCTF and BCCRF that are under consideration for funding or already under implementation coincide with the sectorial and regional components of the proposed CEIP-I. We therefore recommend interacting closely with the above mentioned funds to avoid duplication and/or uncoordinated actions.</p>	<p>Thank you for this comment. Indeed, the team is fully aware of the BCCTF and BCCRF. Incidentally the TTL of the CEIP-I was also the program manager for BCCRF from 2009-2012. The Joint Secretary of the Ministry of Environment and Forests is both the focal point for the PPCR, BCCRF and BCCTF and hence can easily ensure that no duplication occurs. The CEIP team recognizes the importance of proper coordination and will continue to do so during project implementation to capture synergies and avoid duplications. The CEIP Project Director at the Bangladesh Water Development Board (BWDB) is also the PPCR focal point at BWDB and is fully familiar with the SPCR and its various implementation component. Very recently, MOEF has hired 2 staff for the Secretariat of BCCRF and through the Secretariat an enhanced coordination mechanism will be created. A larger capacity building project to support the Secretariat is also under preparation and will be funded by BCCRF.</p> <p>In addition, the Ministry of Environment and Forest (MoEF) –being the apex planning body to deal with issues of climate change—is an</p>

		integral stakeholder of the project through their role in the CEIP Project Steering Committee.
3	The <i>Bangladesh Water Development Board</i> (BWDB) has been chosen as the implementing partner for the project. A project management unit will be attached to the BWDB to oversee the management and implementation of the project. We have observed that the institutional capacity of the BWDB is currently overstretched, which is mainly due to the high volume of workload and the lack of adequate staff in the respective fields of operation. To minimize the risk of project delays and proper financial management, we recommend addressing these deficits in the beginning of project implementation.	This is an excellent remark. The team is conscious of the BWDB implementation capacity and will pay extra attention to capacity needs during implementation. The project design allows BWDB to recruit additional staff to augment existing capacities. The project will provide immense training and capacity building opportunities to BWDB staff. This will be achieved through: (i) retaining the PMU staff to BWDB, (ii) training BWDB staff on engineering, financial, social, procurement and monitoring and evaluation issues, and (iii) exposure to advanced engineering practices in polder management and rehabilitation—as the projects seeks to attract large companies for rehabilitation work.
4	Participation The project concept foresees consultations with and participation among the stakeholders and beneficiaries during the implementation of the project. This will be done mainly through polder committees or water management organizations. Since the system of decentralization and delegation of authority to the sub-national level is still not well established in many areas in Bangladesh, it needs to be ensured that the population in the project area has a key role in the design and implementation of specific activities in their communities. The population needs to be recognized as an untapped human resource of thousands of people, who should be engaged in their own protection. This would strengthen their ownership, enable the population to develop responsibility for their own fate, and ensure sustainability of the measures.	The social mobilization and development of Water Management Organizations (WMO) will build on guidelines for <i>Integrated Planning for Sustainable Water Resources Management</i> (IPSWAM). The process has been piloted effectively under BWDB. Recognizing the lack of decentralization and the delegation of authority to the sub-national level, it is envisaged that social mobilization, social afforestation, and implementation of resettlement action plan will be implemented through a well-established NGO.
5	Gender Women have been identified as particularly vulnerable to the negative impacts of climate change and natural disasters in the coastal areas of Bangladesh. Gender aspects have been taken into account in the project proposal, for example the intended participation of at least 30% of women in the water management organizations. However, we recommend reflecting gender aspects more strongly also in the results framework, especially in regard to the indicator “Number of people benefiting from increased resilience to Climate Change”. The footnote referring to this indicator states that this indicator will be further disaggregated by gender and income, “if feasible”. To be able to measure the impact of the project interventions on women it is crucial that this indicator will actually be disaggregated by gender.	Good suggestion. The indicator has now been revised to include the percentage of women as part of the indicator itself.
6	Learning Several components of the CEIP-I project include piloting processes that might – if found appropriate – lay the groundwork for future upscaling. In this context we would welcome to closely monitor the degree of decision making power of the communities involved in the project and the institutional and implementation arrangements concerning coordination and alignment with other actors and programs working in the field of climate change and adaptation and disaster preparedness and response	This point can be reflected in the preparation of the Terms of Reference of the Third Party Monitoring Agent, so it can be tracked during implementation.

	in Bangladesh.	
7	<p>Synergies with other donors – in particular German – Climate Change Related Engagement in the Country / Region</p> <p>The development partners and the Government of Bangladesh have established the “<i>Local Consultative Group</i>” (LCG) as a joint platform for communication and coordination in the focus areas of Bangladesh’s development agenda. The <i>LCG Working Group on Climate Change and Environment</i> is co-chaired by the <i>Ministry of Environment and Forests (MoEF)</i> and a representative of the development partners (currently UK Department for International Development (DFID)). Since the CEIP-I is implemented by the BWDB under the overall responsibility of the <i>Ministry of Water Resources (MoWR)</i>, we recommend close interaction between the MoEF and MoWR and the active participation in the above mentioned LCG working group.</p> <p>Germany is engaged with several bilateral projects in the coastal belt of Bangladesh, for example: 1) <i>Sustainable Development and Biodiversity Conservation in Coastal Protection Forests</i>, where Germany is supporting the coastal rehabilitation in the Sundarbans region, focusing on participation of local stakeholders in managing and protecting the coastal impact zone. 2) <i>Adaptation to the Climate Change in South Western Bangladesh</i> (Coastal Livelihoods Adaptation Project, CLAP), dealing with rehabilitation of livelihood and coastal infrastructure in Barisal, Patuakhali and Barguna. The implementation of both projects is assisted by GIZ on behalf of the German Federal Ministry for Economic Cooperation and Development (BMZ). We recommend exploring opportunities of cooperation between the proposed project and bilateral engagement in this area such as the German-supported projects mentioned above to exploit synergies to the best extent possible.</p>	As noted above, the Ministry of Environment and Forests is focal point of the PPCR, and they are a member of the CEIP-I Project Steering Committee. That will ensure their full involvement and continuous awareness of the implementation of the project. The CEIP-I is already collaborating closely with the ADB – PPCR funded project on the coastal area as well as with the Danish funded IPSWAM program for the establishment of WMOs. During implementation, the team will explore options to cooperate with GIZ to share lessons and to make sure that development partners engagement in this area are complementary.
Australia		
8	Thanks for the opportunity to comment on the Bangladesh Coastal Embankment Improvement Project (CEIP). Australia supports the decision proposed to approve grant funding of USD25 million for the project, and USD275,000 for the final tranche of funding for supervision services costs. In reviewing the document, we have identified some areas where the Project Appraisal Document could be strengthened.	Thank you.
9	<p>Monitoring and Evaluation</p> <p>It is positive to see the application of the PPCR core indicator (A.1.3# of people supported by the PPCR to cope with the effects of climate change). Most of the other indicators in the results framework relate to the capital works, and do outline the link between these works (drainage structures, embankments, sea level rise monitoring systems) and how peoples’ lives have been supported to cope with climate change. It therefore may be useful to incorporate evaluations/results indicators (and monitoring processes) to demonstrate how the capital investments have improved the lives of the poor that are vulnerable to climate change.</p> <p>The results framework has not incorporated the more qualitative PPCR results indicators, including:</p> <ul style="list-style-type: none"> – The degree of integration of climate change into national, including sector, planning – Evidence of strengthened capacity and coordination mechanisms to mainstream climate resilience. – Quality of and extent to which climate responsive instruments/ investment models are 	<p>The major indicators are concerned with protection of land for agriculture production and protection of people against climate change. The intermediate indicators are to monitor capital works.</p> <p>The qualitative indicators of PPCR results indicator are implicitly captured in the proposed results indicator. For example:</p> <ul style="list-style-type: none"> – The implementation of the long term monitoring program will in no doubt contribute to strengthen the integration of climate change into national and sector planning. Quantitatively monitoring such indicator is not trivial; therefore the monitoring of the enabling environment for integration of climate change into planning through creation of long term monitoring is a sufficient proxy.

	<p>developed and tested.</p> <p>Given that PPCR activities are intended to provide scale-able pilots, which would be applicable to other countries/regions; it would be useful if the Project Design could incorporate evaluation processes that incorporate these more qualitative results indicators; particularly given that the project is working with a range of Ministries (Water Resources, Environment, Agriculture, Finance, Forestry, Public Health, and Engineering). This relates particularly to the community-based aspect (i.e. establishment of the water management organizations) – i.e. the quality of and extent to which this model of WMOs as a climate responsive model. AusAID would also be particularly interested in seeing gender-disaggregated data in the results framework.</p>	<ul style="list-style-type: none"> – The creation of a steering committee representing all stakeholders as an example of strengthening coordination mechanisms. – The creation of WMO is a good example to create a climate responsive instrument. <p>As indicated above (comment #5) the gender indicator has now been included.</p> <p>Finally it is important to note qualitative PPCR results indicators such as those mentioned in the comment, will also be monitored through other PPCR funded activities, in particular the Technical Assistance implemented by the ADB: <i>Climate Change Capacity Building and Knowledge Management</i> with the Ministry of Environment and Forests.</p>
10	<p>Coordination and role of the BCCRF</p> <p>The Project Design notes the BCCSAP (paragraph 18) but does not refer to the Bangladesh Climate Change Resilience Fund (BCCRF), which is intended to have a coordinating role for donor investments under the BCCSAP (alongside the Bangladesh Government’s own trust fund for climate change). It will be important for all Bangladesh SPCR activities to be coordinated with the activities under the BCCRF and the Government’s Climate Change trust fund. It is not clear from the documentation how the alignment/coordination is being operationalized. The World Bank can play a useful role in linking up the BCCRF, as its trustee, and the Bangladesh Government’s SPCR activities. It would be useful to provide further information on how the PMU would relate (perhaps more frequently) with the Ministry of Environment, given its coordination role for the BCCRF and the BCCSAP. Similarly, it is also unclear how this investment is building on, or aligned with other disaster management programs, such as the Comprehensive Disaster Management Program (CDMP II) managed by the UNDP (which AusAID contributes to).</p>	<p>Thank you for your comment. A similar comment has been raised by Spain/Germany and our response can be found in Comment # 2.</p>
11	<p>Coordination with SAWI and AusAID investments in Water Resources Management</p> <p>Given the focus on water resources, it is important that this work is also coordinate with the regional work – i.e. the South Asia Water Initiative, administered by the World Bank – as well as bilateral contributions to Water Resources Management. Australia, through the CSIRO, is working with the Bangladesh Government (a range of agencies) on a research project which aims to provide options for policy and management to enable Bangladesh to equitably and efficiently allocate and use water in the future. Attached is the inception report for this project. AusAID will follow up with the World Bank contact officer (Salman Zaheer, Country Director) to ensure that the synergies between this work are harnessed going forward, particularly for component C3 (paragraphs 122 and 123).</p>	<p>The team also recognized the importance of coordinating activities funded by the CEIP-I with SAWI and AusAID investment in the water sector in Bangladesh. Incidentally, the team involved in the preparation of the CEIP-I is also a member of the SAWI team, and is hence fully familiar with all SAWI activities. The team has already identified potential synergies between the project and the mandate of SAWI. For example, the investment in long term monitoring of the delta and building the data base for better future planning for coastal management will be instrumental in creating evidence based policy support to government of Bangladesh.</p>
12	<p>Resettlement – safeguards implementation</p> <p>In implementing component B2 (Implementation of Resettlement Action Plans) the application of social</p>	<p>We share the same concerns and we are committed to closely monitoring these aspects during implementation. To ensure a solid</p>

	<p>and environmental safeguards is a high priority for AusAID. We are therefore concerned that the Resettlement Action Plan (outlined in paragraph 183) effectively implements environmental and social safeguard procedures. Assurance that the Government of Bangladesh has capacity to effectively implement the Bank’s resettlement policies, and that its implementation will be monitored closely is important in this regard. If there are gaps (under capacity in certain areas) we consider it important that resources are allocated to support the implementation of safeguard measures, particularly for land acquisition and resettlement.</p>	<p>quality in the preparation of the <i>Social Management and Resettlement Policy Framework</i> and the <i>Resettlement Action Plan</i> the Bank requested that an independent reviewer revise the quality of the document before they are submitted. This has substantially improved the quality of the documents, which are now available publicly in the world bank infoshop website. During implementation, various measures have been introduced to ensure the proper implementation of the RAP, in particular the recruitment of a qualified NGO to implement the RAP, the recruitment of a third party monitor to supervise the implementation of the RAP and finally the recruitment of world renowned social scientist in the Independent Panel of Expert to also provide advice to BWDB.</p>
UK		
13	<p>Thanks for the opportunity to comment on the Bangladesh Coastal Embankment Improvement Project (CEIP) – the UK is happy to endorse this. Please see below some further comments:</p> <ul style="list-style-type: none"> – The UK welcomes this project – the preparation process followed in this project is good and robust. – The project document is well written and has made links to almost all the existing policies and strategies and plans available in Bangladesh. However, in-country evidence suggests that coordination between PPCR activities and other donor and multilateral programs on the ground could be strengthened - this has implications for future investments as there are many players in the coastal zone and PPCR needs to be well integrated in order to deliver sustainable results. Better communications on the ground to give progress reports to donors would be helpful. – Ultimately the integration of sectors and enabling environment has to be created so that all parties can work together. 	<p>Thank you.</p> <p>Please see team responses above about plans for cooperation and coordination with other stakeholders.</p>
14	<p>Monitoring and evaluation</p> <p>Some of the indicators have targets but no baselines. We should ask when these will be established. It is good to have the ‘number of people’ indicator but would definitely be useful to include a gender breakdown.</p>	<p>Thank you for your feedback. The indicators have now been revised, a baseline has been provided whenever feasible and the core indicator has been disaggregated to include gender as well.</p>
15	<p>Lesson learning</p> <ul style="list-style-type: none"> – Good that the project has learned lessons from other programs (e.g. around need for timely maintenance) and is considering the possibility of scaling up in future phases of CEIP. – To construct and manage the polder system in Bangladesh is very challenging and there are various well documented lessons learned and experiences. The lessons learned so far (Dutch experience in polder management and WB experiences from early sixties) have been considered very carefully in designing the project. – Dutch Blue gold project needs to be consulted and experiences shared. 	<p>Thanks. We will consult with Dutch Blue during implementation.</p>
16	<p>Sustainability</p> <ul style="list-style-type: none"> – Leadership quality of the senior level staff dealing with water sector is very important for the 	<p>Thank you for the feedback. We agree on the importance of minimizing the turnaround of key staff, but also recognized that keeping the same Project Director for the entire duration may be</p>

	<p>success of this project.</p> <ul style="list-style-type: none"> – This project is for 7 years and the project proposal states that all staff will be expected to serve for the duration of the project in order to ensure consistent implementation of the project. However, to find a Project Director at the level of Chief Engineer (in BWDB) with 7 years left in service will be difficult. – The grant money will also be utilised for long term monitoring, research analysis (\$5 million). This is very important for the coastal zone management of Bangladesh. 	<p>difficult. In most terms of reference a note will be added to encourage contract renewal based on good performance and minimize turnaround.</p>
17	<p>Value for money</p> <ul style="list-style-type: none"> – Pleased that the proportion of project implementation and supervision costs are comparatively low. – Pleased that the World Bank have recently introduced a new “Governance and Accountability Action Plan” for better financial management and procurement. This will ensure value for money and issue of due diligence during implementation of the project. 	<p>Thank you.</p>
18	<p>Safeguards/resettlement</p> <p>Like our Australian colleagues, we are concerned that the Resettlement Action Plan will effectively implement environmental and social safeguard procedures. We would like further reassurance, that the Government of Bangladesh has the capacity to effectively implement the World Bank’s resettlement policies, and that its implementation will be monitored closely, i.e. it would be helpful to have sight of the draft Resettlement Action Plan that was disclosed in February (para 36).</p>	<p>Thank you for this comment. See response above. The Resettlement Action Plan and other disclosed project documents can be found here: http://www.worldbank.org/projects/P128276/coastal-embankment-improvement-project-phase-1ceip-1?lang=en</p>
19	<p>Other issues needing further consideration during implementation stage</p> <ul style="list-style-type: none"> – Operation of the polders is very important because the demand and agricultural practice has been changed (without proper operational strategy full benefit cannot be achieved); – The morphological changes of the coastal zones of Bangladesh have to be considered during designing the drainage infrastructure. The outside river morphology is vital and the present siltation problems need careful consideration. Gravity drainage possibilities in the coastal zones of Bangladesh should be further investigated. – Para 28 refers to a 25 year return period, but also suggests the protection level will be close to 1 in 50 years – we would be grateful for clarification on these two figures as appear to be inconsistent. 	<ul style="list-style-type: none"> – Both Polder Committee members and WMO will be trained to contribute to improve operations procedures. – The morphological changes are complex and dynamic and we have fully accounted for them in the project design. But they are subject to rapid changes. The <i>long term monitoring plans</i> will advance the understanding of such dynamics and aid future designs. – The protection level 1-in-50 years refers to the approximate level of protection once the construction work is completed. Given the expected adverse impact of climate change the tolerance of the embankment will decline to 1-in-25 by end of the design period—i.e. 30 years.