

April 22, 2013

**Comments from Spain and Germany on Approval by Mail: PPCR Bangladesh:  
Coastal Embankment Improvement Project**

Dear BGL PPCR Team,

Spain and Germany very much welcome the proposal from Bangladesh. Please find attached some further comments.

**Kind regards**  
**Annette Windmeisser**

**Joint Spanish and German Comments**

**People's Republic of Bangladesh**  
**Coastal Embankment Improvement Project Phase-I (CEIP-I)**

**Summary**

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.

**Individual Comments on the Proposed Project**

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.

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.

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 *Bangladesh Climate Change Trust Fund (BCCTF)* and the *Bangladesh Climate Change Resilience Fund (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.

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.

The *Bangladesh Water Development Board* (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.

## **Comments on Cross-Cutting Issues**

### **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.

### **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.

### **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 in Bangladesh.

### **Synergies with other donors – in particular German – Climate Change Related Engagement in the Country / Region**

The development partners and the Government of Bangladesh have established the “*Local Consultative Group*” (LCG) as a joint platform for communication and coordination in the focus areas of Bangladesh’s development agenda. The *LCG Working Group on Climate Change and Environment* is co-chaired by the *Ministry of Environment and Forests* (MoEF) 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 *Ministry of Water Resources* (MoWR), we recommend close interaction between the MoEF and MoWR and the active participation in the above mentioned LCG working group.

Germany is engaged with several bilateral projects in the coastal belt of Bangladesh, for example: 1) *Sustainable Development and Biodiversity Conservation in Coastal Protection Forests*, 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) *Adaptation to the Climate Change in South Western Bangladesh* (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.