

February 5, 2013

**Comments from Germany and Spain on the Approval by Mail: PPCR Tajikistan:
Environmental Land Management and Rural Livelihoods Project (IBRD)**

Dear PPCR Team from Tajikistan and MDB's,

Please find attached our joint Spanish and German comments on the above mentioned project proposal.

Kind regards
Annette

Dr. Annette Windmeisser

Division for Climate Policy and Climate Financing
senior political advisor
Federal Ministry for Economic Cooperation and Development

Summary

Tajikistan is highly vulnerable to the negative impacts of climate change. Tajikistan also suffers from natural disasters, land degradation and water scarcity. The majority of the population lives in rural areas and depends on agriculture, which accounts for 24% of GDP and 64% of employment. Against this background, a PPCR engagement to strengthen climate resilience in rural areas and in the agricultural sector is highly relevant to the country. We do, however, have a number of substantial concerns regarding the project as presently proposed, as detailed below. We would therefore raise an objection against the project as formulated at this point, and ask for the project proposal to be amended, as outlined in our recommendations below (see bold highlights).

Individual Comments on the Proposed Project

The proposal describes Tajikistan quite clearly as one of the most vulnerable countries to the adverse effects of climate change in Central Asia. The proposal then proceeds, however, to outline a rather standard issue rural development project, and does little to demonstrate in a plausible manner why this is a dedicated adaptation to climate change project, and how this project would contribute to the objectives of the PPCR beyond rather generically supporting a sector that is vulnerable to climate change. The project proposal, in our view, fails to clearly explain how resilience *to climate change* would be improved and how such improvement would be measured – as opposed to merely improving resilience to adverse social and environmental conditions in general. It furthermore fails to explain how mainstreaming climate change, in the sense of the PPCR's overall objective "to pilot and demonstrate ways to integrate climate risk and resilience into core development planning", will be addressed beyond merely conducting participatory appraisals. In other words, it remains largely unclear to us why implementing this project would justify a PPCR investment. **We therefore strongly**

recommend raising the proposal's ambition with regard to mainstreaming climate change in a rural environment.

The results framework contains one indicator that appears to aim at measuring the success of climate mainstreaming: "2.1.(a) Cumulative number of villages implementing community action plans based on climate change adaptation and environmental appraisals". This indicator, however, appears rather isolated within the overall results framework. An explanation is being provided in *Annex 2: Detailed Project Description* on how "participatory environmental, climate change and village appraisals" will be conducted, which is rather brief but certainly helpful. **We feel, however, that the proposal is missing out on explaining which steps will be taken and which incentives will be provided to ensure that these "climate change adaptation and environmental appraisals" will not only be produced, but will actually be *used* in commune level decision making, instead of conducting village planning business as usual, and would strongly recommend clarifying that further in the proposal.**

Related to the previous comment, we are also quite concerned about the formulation of indicator 2.1.(a) itself. Footnote 15 describes this indicator as relating to PPCR Program Outcomes Indicator (core) B1. This is, at best, a rather distant relation: the core indicator is *qualitative* and aims to measure the "*extent* to which PPCR supported tools, instruments etc. are being *used*", while indicator 2.1.(a) is a mere quantitative indicator *counting* the "*number* of villages implementing community action plans based on climate change adaptation and environmental appraisals". There is no qualifier measuring what is required for a village action plan to be *based on* a climate change adaptation and environmental appraisal, as opposed to a village having had such an appraisal performed and then proceeded with business as usual. **We would therefore strongly recommend to align indicator 2.1.(a) to a much greater degree with PPCR core indicator B1, to measure that a climate change adaptation and environmental appraisal has actually *resulted* in planning being done in a different manner, and to also adjust other parts of the proposal accordingly, where necessary, to reflect this change in the indicator.**

Apparently, conducting "participatory environmental, climate change and village appraisals" will require the support of "facilitating organisations". This raises questions regarding the sustainability of the approach, since either the continued presence of the "facilitating organisations" would need to be ensured, or local communities would need to have their capacities built to be able to conduct such appraisal without external assistance. The proposal mentions "the Aga Khan Foundation, UNDP, and others" – but quite possibly the organisations named cannot be counted on to provide continued support once the project has ended. **We would therefore appreciate further clarification on who the "facilitating organisations" would be, in particular those facilitating the "climate change ... appraisals", being a rather new and innovative approach.**

Similar comments as made above on indicator 2.1.(a) apply to indicator "1. Cumulative number of households ... participating in ... rural production investment", which is described in footnote 9 as relating to PPCR Transformation Indicator (core) A1.3. Indicator A1.3 reads "numbers of people supported by the PPCR *to cope* with the effects of climate change". Indicator "1. Cumulative number ..." does not appear to reflect this aspect of *cop*ing altogether, since "participating in ... rural production

investment” does not automatically lead to better coping – quite the contrary could be the case: if an investment failed to sufficiently take climate change into account, it might well lead to maladaptation. **We therefore strongly recommend to aligning indicator 1. to a much greater degree with PPCR core indicator A1.3, to actually measure whether people are better able to cope, instead of just participating in investments, and to also adjust other parts of the proposal accordingly, where necessary, to reflect this change in the indicator.**

Comments on Cross-Cutting Issues

Gender

Gender aspects are being discussed in various places throughout the proposal, with statements such as “The project will seek to address gender and social inclusion issues through its use of participatory processes, and the monitoring and evaluation of project results” or “Monitoring and evaluation... Gender disaggregated data will be collected and analysed regarding project beneficiaries”. We very much welcome the strong intent to address gender issues, **but feel at the same time that this intent should be reflected much more strongly in the results framework.** The indicator “Proportion of project beneficiaries who are women” is a good start, but covers only the aspect of who receives the project’s outputs and services. There is no attempt recognizable in the results framework to measure whether female beneficiaries actually experience *improvements of their livelihoods* as a result of their receiving the project’s outputs and services. **We therefore recommend very strongly not only collecting and interpreting gender disaggregated data to track recipients, but to make a conscious attempt to measure the *impact* that the project’s outputs and services have on the livelihoods and in particular on the climate resilience of female beneficiaries.** Indicator “2. Proportion of population by household in target villages reporting at least XX% increase in well-being or household/livelihood assets” for instance would lend itself to further differentiation by gender. **An indicator tracking the increase of resilience of female beneficiaries would need to be added.**

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

We very much appreciate that, at a technical level, an active exchange on matters of rural development has already taken place during project preparation between the advisors working on the implementation of German-supported projects in Tajikistan and the project planning team. We also appreciate the proposal reflecting this exchange by outlining the potential for cooperation and synergies between the proposed project and the DIFD/GIZ *Growth in Rural Economy and Agriculture – Tajikistan* (GREAT) program, **and strongly encourage close coordination between both projects. We confirm the potential for synergies outlined in the proposal, and encourage exploited it to the best extent possible,** e.g. by exchanging information and experiences, by selecting project areas to supplement each other without overlapping, and by recognizing each other’s village level work and harmonizing village approaches and anticipated village structures. GREAT could for instance contribute its experience with

agricultural advisory services, and with processing and marketing of fruit and vegetables.