

April 22, 2013

Comments from Australia on Approval by Mail: Bangladesh: Coastal Embankment Improvement Project

Dear CIFs administrative unit,

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.

Monitoring and Evaluation

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.

The results framework has not incorporated the more qualitative PPCR results indicators, including:

- 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 developed and tested.

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, 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.

Coordination and role of the BCCRF

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).

Coordination with SAWI and AusAID investments in Water Resources Management

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).

Resettlement – safeguards implementation

In implementing component B2 (Implementation of Resettlement Action Plans) the application of social 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.

Kind regards

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