

April 22, 2013

Comments from the United Kingdom on Approval by Mail: Bangladesh: Coastal Embankment Improvement Project

Dear CIF Admin Unit,

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:

- 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 programmes 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.

Monitoring and evaluation

- 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.

Lesson learning

- Good that the project has learned lessons from other programmes (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.

Sustainability

- Leadership quality of the senior level staff dealing with water sector is very important for the success of this project.
- 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.

Value for money

- 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.

Safeguards/resettlement

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).

Other issues needing further consideration during implementation stage

- 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.

Kind regards,

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