

November 22, 2013

Approval by Mail: PPCR Bangladesh: Coastal Towns Infrastructure Improvement Project – Comments from Germany and Spain

Dear Andrea, dear PPCR Bangladesh team,

pls find attached the Spanish/German comments on the Project proposal from Bangladesh "Coastal Towns Infrastructure".

We happily approve of the project and would like to draw your attention to the attached comments for further consideration during implementation.

Kind regards
Annette

**Joint Spanish/German Comments on proposed project:
People's Republic of Bangladesh: Coastal Towns Infrastructure Improvement Project
Summary**

Bangladesh's low lying coastal zone is highly vulnerable to cyclones, storm surges, sea level rise, and salinity intrusion. Simultaneously, coastal towns suffer from large infrastructure deficits as a result of low capital investment, poor operation and maintenance (O&M), and natural resource constraints which exacerbate their sensitivity to climate change. The project proposal to improve well-being in coastal towns by strengthening climate resilience and disaster preparedness, in our view, addresses these issues very well.

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

The proposed project aims at strengthening climate resilience and disaster preparedness in eight vulnerable secondary towns (*pourashavas*) in coastal areas of Bangladesh. These secondary towns will also be the implementation agencies. The proposal builds on the logic that the high vulnerability of coastal towns is also linked to low adaptive capacities. In this regard, we would like to draw attention to the question of sustainability. Past experiences have shown that considerable capacities are needed in order to guarantee that investments will be financially and technically sound. But existing capacities are often not strong enough, even in big towns. The planning and, in particular, the enforcement capacity regarding town planning and building standards is currently rather weak. **We therefore recommend building up capacities – at least in parallel with the infrastructure investments, better before.** For instance, while strengthening the financial management of municipalities as foreseen in the project proposal, consider which technical and administrative capacity the secondary towns have to build up in order to ensure operation and maintenance, which are the minimum organograms and the correspondent staffing, etc. **We further suggest to also reflecting the importance of capacity building in the project's budget.**

With regard to the technical aspects of some of the proposed measures, we would like to **suggest searching for a sustainable concept on how to manage surface water effectively**. For example, pumping water out of deeper seams will not hinder salt- and brackish water to infiltrate.

We appreciate that the project aims at implementing a holistic and integrated approach to urban development. However, we **recommend closing monitoring the actual implementation of urban development, land use and land development plans**, because even if such plans are holistic and of high quality, implementation gaps may remain, and priority may be given to the real estate and building sectors at the expense of other objectives.

Comments on Cross-Cutting Issues

Participation

The project concept foresees various mechanisms for participation of citizens, particularly under output 2 *"Strengthened institutional capacity, governance, and awareness"*, like enhancing citizen participation in secondary towns (*pourashava*) planning and decision making, or establishing disaster management standing committees in each secondary town and delivering appropriate technical training for the members of such committees. Such disaster management committees have proven to be very effective e.g. in Mozambique, where they are an integral part of the community-based early warning system. However, these community based organisations in most cases will need to be built up first, and establishing them for a specific purpose only could pose a challenge for their sustainability. Also, **attention would need to be paid to not limiting the sphere of influence of civil society**, as experience shows that in those cases, where town and ward-level committees have already been formed, the civil society members have often been nominated by the mayors.

Gender

Women have been identified as particularly vulnerable to the negative impacts of climate change and natural disasters in the coastal areas of Bangladesh. The project will significantly benefit women by (i) improving access and quality of cyclone shelters considering separate spaces for women, (ii) encouraging leadership roles of women in community based organisations and town and ward level committees, (iii) targeting women in outreach programs for disaster preparedness and awareness raising, and (iv) providing targeted livelihood training programs for women. We appreciate that gender aspects have been taken into account in the project proposal and we particularly appreciate that this is also reflected in the output indicators of the results framework. In this context, we suggest to also **include gender with regard to the indicators related to the outcome *"Increased climate and disaster resiliency in coastal towns benefiting the poor and women"***, e.g. by stating the percentage/ number of female headed households (FHH).

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 group of development partners, currently the UK *Department for International Development* (DFID). Since the proposed project will be implemented under the overall responsibility of the *Ministry of Local Government, Rural Development and*

Cooperatives (MLGRDC), we recommend active participation in the above mentioned LCG working group close interaction between the *Ministry of Environment and Forests* (MoEF) and the *Ministry of Local Government, Rural Development and Cooperatives* (MLGRDC) as e.g. proposed via the inter-ministerial project steering committee.