

December 9, 2013

**Comments from the States-- Bangladesh: Coastal Towns Infrastructure Improvement Project [ADB] PPCR**

Dear Patricia,

Thank you for the opportunity to review this project. The US is pleased for the project to move forward, and would like to see the following issues addressed during final preparations for presentation to the ADB board and during project implementation.

1. The project should coordinate with related activities already underway. USAID's Feed the Future program is providing funds to Bangladesh's Local Government Engineering Department (LGED) through a government-to-government award for infrastructure rehabilitation and construction of market centers, roads, etc. USAID has also been investing in cyclone shelters, as is the Bangladesh Climate Change Resilience Fund (BCCRF), funded by a number of donors including USAID. Although there is a Local Consultative Group (LCG) with relevant working groups on climate change and disaster and emergency response, we recommend that the project actively reach out to USAID and other donors working in this space, in order to ensure that it is up to date on all the climate change and disaster-related infrastructure projects currently being undertaken in Bangladesh.

2. An integrated/"packaged" approach to infrastructure projects should be emphasized in the management of the project and in coordination with other GOB and donor activities. For example, construction of cyclone shelters should also consider access roads and related infrastructure. (As background, USAID & the US Army Corps of Engineers are building in very rural areas brick paved paths to assist in getting agriculture products to market. Although not as smooth as asphalt, they are cheaper to build and maintain.)

3. The issue of long-term maintenance of the infrastructure is critical. It will be important to ensure that capacity/skills and funds exist to maintain this new infrastructure.

4. We are encouraged that the project is giving significant attention to gender issues. We recommend that gender consideration be strengthened. We will provide additional comments on the Project Administration Manual (PAM) submitted with the approval package, but highlight a few points here:

(a) It would be desirable to have gender-focused indicators and/or sub-indicators clearly identified at the project outset, rather than developed during the project, to ensure that an appropriate baseline is established and that gender considerations remain a core focus of the project through all stages of design, implementation and evaluation. We would encourage the ADB to consider developing indicators for women's empowerment and changes in status.

(b) We encourage the ADB to consider special training for LCG and their partner organizations on this issue to help women engage in dialogue and participate. Beyond numeric targets for women's "participation" in meetings, women should feel encouraged

to speak up. An active approach should be employed to ensure full participation. A plan for overcoming barriers to women's participation should ideally be included in the project design.

(c) Gender considerations should be woven into decisions that will be made over the course of the project. This is not evident in the existing PAM. For example, it will be important to ensure that the sub-project technical selection criteria (as included in Appendix 4 of the PAM) specify that gender issues must be addressed. Similarly, it will be important for the scoring matrix for prioritization of sub-projects to give weight to appropriately addressing gender issues. In addition, the Activities and Performance Indicators listed in Appendix 5 should optimally include gender-related elements to ensure that towns and implementing partners give appropriate weight to these issues in developing applications.

5. We found project materials confusing at times with respect to indicators and targets. For example, Table 11 (“Gender Action Plan”) on p. 33 of the Project Administration Manual includes a column called “Indicators and Targets,” but the elements listed in the column are targets, not indicators. The ADB should review project materials to ensure that indicators and targets are included appropriately.

6. We appreciate the additional information provided by the ADB on procedures to ensure transparent and efficient implementation of the project. Implementation of appropriate financial management, performance and accounting controls and procurement procedures throughout the project will be important to its success. Additional information on the TA to be provided separately would be welcome.

Thank you,

Katie Berg  
US Treasury Department