

UNITED NATIONS DEVELOPMENT PROGRAMME

**Coastal and Wetland Biodiversity Management at Cox's Bazar and
Hakaluki Haor**

Bangladesh

BGD/99/G31

Mid-Term Project Evaluation

October 2008

Abbreviations/Acronyms

BECA	Bangladesh Environment Conservation Act
BME	Biodiversity Management Expert
BWCG	Bangladesh Water bird Census Group
CB	Cox's Bazar
CBA	Community based adaptation
CBD	Convention on Biological Diversity
CBO	Community Based Organization
CWBMP	Coastal Wetland Biodiversity Management Project
CNRS	Centre for Natural Resource Studies
DG	Director General
DC	Deputy Commissioner
DOE	Department of Environment
ECA	Ecologically Critical Area
ECAMO	Ecological Critical Area Management Officer
ECAMU	Ecological Critical Area Management Unit
ECFCP	Empowerment of Coastal Fishing Communities Project
FAO	Food and Agricultural Organization
GEF	Global Environment Facility
GOB	Government of Bangladesh
HH	Hakaluki Haor
IPM	Integrated Pest Management
IUNV	International United Nations Volunteer
MOEF	Ministry of Environment and Forest
MACH	Management of Aquatic Ecosystems through Community Husbandry
NPC	National Project Coordinator
NPM	National Project Manager
NGO	Non-Governmental Organization
NREV	Natural Resource Economic Valuation
NPC	National Project Coordinator
NPPP	National Project Professional Personnel
PMU	Project Management Unit
PRIF	Pre-Investment Facility
PSC	Project Steering Committee
PAPD	Participatory Action Plan Development
SEMP	Sustainable Environment Management Programme
SDA	Sustainable Development Advisor
TOR	Terms of Reference
UNDP	United Nations Development Programme
UNOPS	United Nations Operations and Programme Services
VCC	Village Conservation Centre
VCG	Village Conservation Group

Preface

We, the evaluators of the CWBMP project, express thanks and appreciation for the welcoming manner in which they were received by project staff and NGOs, the DOE, UNDP and other project stakeholders and for the general readiness to share insights and information we needed to conduct an effective and truly independent evaluation. The organisation of our visits and meetings was impressive, as was the presentation of a great deal of documentation arising from the project, and a keen interest among project staff in learning from the results of the evaluation.

In fairness to all involved, a great deal of time has been spent in cross checking information before evaluation findings were settled. To ensure the evaluation was seen to be independent we asked project staff to absent themselves from most meetings with non-project individuals and groups. We thank them for their understanding and cooperation in this respect.

We endeavoured to provide ample opportunity for feedback on our drafts and have seriously considered every point raised.

Our effort will have been worthwhile if this report helps lead to improvements needed to guide this important project towards a truly successful outcome.

Graham Baines

Anwarul Islam

Zahurul Khan

October 2008

Summary

Evaluation findings and recommendations

The project now is just as relevant as it was at the outset of the project design process. Success could bring real gains for global biodiversity and result in a workable model for community based, DOE-guided biodiversity management that could do much to ease poverty in Bangladesh.

At its mid-term point this project shares with others of its type a similar mix of real gains in some areas, while key weaknesses frustrate further progress. There is keen ownership of the project by the DOE, success through sub-contracted NGOs engaged at community level, and a reasonable level of inter-agency cooperation and support at local government levels. A great deal of socioeconomic and biodiversity data relevant to ECA management has been acquired and promising gains for biodiversity of local, national and global significance have been made through interventions at all project sites, even before management plans are in place.

A successful and sustainable overall project outcome remains uncertain. Further progress is dependent on overcoming uncertainty in project management and weaknesses in the key areas of national level inter-agency cooperation, management planning for biodiversity conservation, data management, and monitoring and evaluation. If this can be achieved an extension of this important project is warranted.

Under **Results** the status of each designed Output is assessed in this report before key issues are discussed in detail.

A summary listing of the mission's recommendations is presented here. In the body of the report each is preceded by an explanation (see **Recommendations and their Rationale**).

Recommendation 1: A thorough review of progress, of approaches and methods is recommended. This should include a training needs assessment of project professional and support staff that was stipulated in the Prodoc. These and other actions are needed to bring some fresh thinking to old problems, to reorient project staff and so establish a smoother and surer path for future progress. Some thoughts on how this might be approached are outlined later under **Review for project improvement**.

Recommendation 2: Consider promoting greater inter-agency cooperation by exploring administrative and legal means by which existing fisheries, agriculture and/or lands officers can be engaged more directly in ECA management – through legal authority to assist DOE officers in enforcing ECA rules under DOE oversight and/or through secondment arrangements.

Recommendation 3: Undertake a thorough assessment of whether ECA criteria can be met at St Martin's Island in the face of over-development of tourism facilities and of terrestrial habitat damage reported arising from uncertainties regarding the status of government land on the island. Use the results of this assessment as a basis for deciding whether continued

engagement here has a realistic chance of success. If not, after establishing a good level of coral ecosystem protection at this site, withdrawal might be an appropriate action so as to protect the reputation of the ECA concept and model.

Recommendation 4: The genetic biodiversity of ECA sites be identified and their management needs addressed.

Recommendation 5: Make the governments of Australia and Japan aware of CWBMP project measures to boost the populations and to facilitate the movement of the very migratory birds that are protected through the bilateral Japan-Australia Migratory Birds Treaty and seek those countries' cooperative support in shared global conservation responsibility.

Recommendation 6: Review and reconsider the conservation management planning process and develop a revised and simplified approach that improves chances for the empowerment of resource user communities, the engagement of all other stakeholders and also includes provision for management of cultural, historical and religious sites in ECAs.

Recommendation 7: Engage an appropriately qualified and experienced social scientist to undertake an independent assessment of the impact of the PAPD process, with regard to 1) its effectiveness as a basis for biodiversity conservation management planning and 2) how VCG understanding and commitment extends to other users of ECA biological resources who are not engaged as VCGs.

Recommendation 8: When in final draft form each ECA plan, with its related Upazila, Union and community plans, could benefit from an independent assessment of its social impact. This would also confirm its credibility.

Recommendation 9: The effectiveness of District and lower level ECA committees to be improved in two ways: 1) the head Ministries of the non-DOE professional staff engaged in these committees to provide, or renew, formal directives for their participation; and 2) DOE to ensure that its ECAMOs maintain close communication with members of those committees and ensure they are aware of all meetings, and are briefed as to their purpose.

Recommendation 10: Uncertainties regarding project management lines of responsibility should be addressed as a matter of priority.

Recommendation 11: While there is nothing to suggest problems with the sub-contracting approach to community engagement, it is appropriate that experience to date be systematically assessed and this should include an examination of the extent to which DOE capacity is being developed in the areas in which NGOs are engaged.

Recommendation 12: Prompt action should be taken to establish a suitable project database. This might best be done by contracting a specialist from outside the project, with payment based on results achieved.

Recommendation 13: Seek further guidance to determine which of all the biodiversity factors are best to measure, how, and when, as a basis for establishing meaningful benchmarks against which change resulting from project interventions can be assessed.

Recommendation 14: Make more effort to elicit and document local knowledge of biodiversity and its management, arrange for local knowledge experts to assist communities which have lost such knowledge and make provision for all this in conservation management plans.

Recommendation 15: A technical advisory grouping of individuals from universities and/or other research organisations should be established so the project can gain access to advice, skills, ideas and knowledge that extend that available through its own staff. A networking approach where individuals so engaged are provided with research and teaching opportunities in return for their contributions should be considered.

Recommendation 16: Project staff should remain mindful of cross-cutting issues of poverty reduction, food security, governance, gender equity, mainstreaming and transparency and refer to them where recording and measuring progress.

Recommendation 17: Provided there is a meaningful response to this report's recommendation for a review and reorientation of the project a project extension is supported and, also, an increase in the MCG subject to a review of current arrangements for, and demand for, this facility.

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Introduction

The project in context

The past, present, and future of Bangladesh, and its people's livelihoods, are intimately connected to its relationship with water and wetlands. More than 90% of the country's total area consists of alluvial plains, crisscrossed by a complex network of rivers and their tributaries.

Wetlands in Bangladesh are represented by both inland freshwater and tidal salt-water wetlands. Flood plains, *beels* (low-lying depressions in the flood plain), *haors* and *baors* (oxbow lakes) represent the inland freshwater wetlands. The *baors* are bowl-shaped natural depressions between the natural levees of the river subject to monsoonal flooding every year. While the *haor* itself is a seasonal water body formed during the monsoon, the *beels* are low-lying depressions of the *haor* system retaining water even during the dry months of the season. Thus, the *haor* system is a complex of both lacustrine wetlands (with open water) and palustrine wetlands (marshy – with vegetation), depending on the hydraulic behaviour in different seasons.

Tidal salt-water wetlands constitute about 25 per cent of the land area of the country and are represented by mangroves, salt marsh, lagoons, deltaic islands, sand dunes and beaches, barrier islands, sea grass and coral habitats. These coastal wetlands support a very rich diversity of plants and animals, many of which are not found elsewhere in the country. These natural habitats are linked together by a complex web of direct and indirect interactions; disruption of any one has an effect on the others.

A majority of Bangladesh's 150 million people are critically dependent on the country's wetland systems as vital natural resources to sustain them, primarily through agriculture and fishing. While serving as the central pillar of Bangladesh's resource base and thus providing an essential support for its goal of achieving sustainable human development, the country's wetland ecosystems also offer critical habitats for globally significant biological diversity.

These habitats are dynamic and are vulnerable to change. They have limited resilience and a low threshold to irreversible damage.

The CWBMP project seeks to demonstrate a model of community based management, backed by cross-sectoral government and support guided by the Department of Environment (DOE) that can achieve the conservation of biodiversity of local, national and global significance.

Approach to the evaluation

The MTE was undertaken by three consultants, Drs Graham Baines, Anwarul Islam and Zahurul Zakir. Both the context within which the project had been planned, and in which it is being implemented, were considered. The review and evaluation involved document examination, stakeholder interviews, and field observations. Three weeks was spent in-

country and all but one of the ECA project sites was visited. Unavoidably, a planned visit to St Martin's Island had to be cancelled due to rough and unsafe seas prevailing at the time.

Provision was made for feedback to stakeholders – first in a presentation of initial thoughts and findings on the last day of investigations in Bangladesh – with provision for both verbal and written comment. Later, a 29 page compilation of results and findings was circulated in draft form and further comment solicited. A number of points was raised, and addressed, but there are no disagreements to be recorded.

The TOR for the evaluation are at **Annex 1**; the MTE itinerary is at **Annex 2**; persons consulted are listed at **Annex 3** and documents studied are listed in **Annex 4**.

The evaluators had hoped to involve the various stakeholders in the evaluation and so use it as an opportunity for learning and for developing their capacities for progressing project implementation. The limited time available and the size and complexity of the Project meant there were limits to what could be achieved. Nevertheless, a keen interest was noted among most project staff to see the results of the evaluation as a basis for learning and improvement.

Had the evaluators been familiar with the project and its sites before commencement of the evaluation they would have been much better placed to decide on the itinerary proposed and on which communities to meet and sites to inspect. There is always a risk that a project's better results will be put on view for evaluators though, with the limited time available for project evaluation that is a risk for all project evaluations. This risk was greatly minimized by the fact that the experience of this team of evaluators meant they were readily able to pick up discrepancies, identify gaps, resolve differing accounts, clarify misunderstandings and target the key issues – while also being able to draw on their backgrounds to quickly identify the positives emerging from project implementation.

In order to maintain independence and to demonstrate that independence to stakeholders and beneficiaries project staff were asked to absent themselves from many meetings.

To be truly effective the results of this evaluation should lead into a systematic review and reorientation in which all project staff should engage and in which the Project Steering Committee (PSC) should be active. This is an overarching recommendation of this report. It represents an extension of the evaluation into practical application of its results.

The Project and its development context

Project start and duration

The Prodoc was signed by the GOB and UNDP in December 2001, though implementation was not commenced until the end of 2002. An inception workshop was held in June 2003 and the draft report of that workshop was presented to, and accepted by, the first PSC, six months later, in January 2004. Administrative issues that were addressed by a Tri Partite Review (TPR) meeting led to a five months suspension and this report was not released until December of 2004.

A period of seven years was set for implementation. Though nominally now in its sixth year and due for completion at the end of 2009 the number of years of actual implementation could be said to approximate four years. This represents 57% of the planned duration and corresponds with a project staff report that, to date, 62% of budgeted funds have been utilised.

Problems that the project seeks to address

A CWBMP pre-investment formulation project (PRIF) selected the CWBMP target sites for their globally significant biodiversity, based on the degree to which the following criteria were met:

- National priority areas for biodiversity conservation, as defined by, e.g., the UNCED national report, National Conservation Strategy, etc;
- Globally significant biodiversity, including endemic, threatened and endangered species, representative habitats and/or significant within-species genetic diversity;
- Opportunities for development of sustainable use programmes;
- Threats and root causes realistically addressable through a GEF intervention;
- Full support of local communities;
- Representativeness of distinct wetland ecosystems, i.e., inshore marine and coastal ecosystems and shallow freshwater *haors* or lakes, and;
- Representativeness of the challenges facing management of the sites, implying important opportunities for replication.

The CWBMP has two main activity areas: coastal ecosystems at the Cox's Bazar Project sites (Sonadia Island, St. Martin's Island and Teknaf Peninsula) and, inland, the large Hakaluki Haor freshwater wetlands complex.

These sites were nominated as ECAs – Ecologically Critical Areas (ECAs) under the 1995 Environmental Conservation Act (BECA '95). BECA articulates and expands upon the environmental management and sustainable development goals of the 1992 Environmental Policy. In particular, it defines the environmental regulatory regime and DOE's mandate in this area.

Project objectives

The overall objective of the project is to establish an innovative system for management of Ecologically Critical Areas (ECAs) in Bangladesh that will have a significant and positive impact on the long-term viability of the country's important biodiversity resources.

The project's components, expressed in the Prodoc as objectives, are:

Objective 1: To ensure the conservation and sustainable use of globally significant wetland biodiversity at the Cox's Bazar sites through their management as ECAs

Objective 2: To ensure the conservation and sustainable use of globally significant wetland biodiversity at Hakaluki Haor through its management as an ECA

Objective 3: To support efforts by DOE to institutionalize the concept of ECA management using the experience gained through the above demonstration sites

Main stakeholders

The main stakeholders are local communities of the project ECAs and those whose interests are represented by members of the Project Steering Committee. The PSC was established according to a notification dated: 2/9/2003 issued by the Ministry of Environment and Forest. Its membership of 29 is as follows:¹

Secretary, Ministry of Environment and Forest, Chairman
 Director General, Department of Environment
 Chief Conservator of Forest, Forest Department
 Director General, Department of Fisheries
 Director General, Agriculture Extension Department
 Director General, Department of Social Welfare
 Chairman, Tourism Corporation
 District Commissioner, Sylhet
 District Commissioner, Moulvibazar
 District Commissioner, Cox's Bazar
 Representative, Land Ministry
 Representative, Ministry of Water Resources
 Representative, Local Government Division
 Representative, Ministry of Fisheries and Livestock
 Representative, Ministry of Disaster Management, Relief and Rehabilitation
 Representative, Commerce Ministry
 Representative, Rural Development and Cooperation Division
 Assistant District Commissioner (Revenue), Sylhet
 Assistant District Commissioner (Revenue), Moulvibazar
 Assistant District Commissioner (Revenue), Cox's Bazar
 Program Coordinator, Sustainable Environment Management Program
 Project Director, UNDP/FAO Community Fisheries Project
 Project Director, St Martin's Biodiversity Conservation, Marine Park Establishment
 &
 Development Project
 Representative, Local NGO
 Local Govt. Representative

¹ The mission notes, but is not surprised, that it has proved difficult to engage and sustain the interest and support of the great diversity of agencies represented in the PSC.

Representative of Civil Society
 Biodiversity Management Expert, CWBMP
 Representative, UNDP/GEF
 National Project Director, CWBMP, Secretary

Target beneficiaries

In addition to the global beneficiaries of the biodiversity to be conserved a number of categories of in-country individuals and groups are expected to benefit, including:

- Local communities, particularly those participating in Village Conservation Groups directly engaged by the project. They are mainly fishing communities in the case of Cox's Bazar site, and both fishing and agricultural communities at Hakaluki Haor;
- Staff of co-operating agencies, particularly DOE, who benefit from exposure to advanced techniques of conservation and resource management;
- Local universities, local NGOs/CBOs/Civil society, scientific and technical professionals, who benefit from consulting opportunities on the project and, as the Prodoc envisaged “ *contact with leading international experts in various conservation fields.*”

All of the local communities dependent on the resources of the ECAs that are the target of project interventions are expected to benefit, though it is impractical for the project to engage them all directly.

Results expected

It is expected that by the end of this project:

- An innovative system with the objective of effective long-term conservation and management of ecologically important areas of Bangladesh will have been demonstrated and institutionalised.
- The importance of people's participation to the success of such a system will have been demonstrated.
- A number of additional, carefully selected sites will have been named as ECAs.
- At the national level, sufficient management capacity will have been created within DOE to allow the effective co-ordination and management of a growing network of ECAs.
- Mechanisms to facilitate inter-sectoral dialogue and support for conservation and sustainable use of ecologically sensitive areas of Bangladesh.
- DOE will have initiated legal actions aimed at enforcing ECA regulations.

- Awareness will have been raised concerning the ECA concept and the importance of biodiversity conservation in general.
- At the District level, a system of ECA management units based on inter-sectoral co-ordination will have been demonstrated to be effective.
- At the project ECA sites, good progress will have made towards effective long-term biodiversity conservation. Through Village Conservation Groups and Centres local people will appreciate the principles of effective conservation and sustainable use. They, in turn, will have helped to implement immediate conservation measures as well as additional measures to be specified in each site's management plan.
- As a result of all these measures, it is expected that the prospects for survival and enhancement of many globally and nationally important species these sites will have been significantly improved.

Findings and conclusions

The Project Overall

Project formulation and approach to implementation

A great deal of time and resources went into project formulation. This was warranted and it resulted in a project design that, though it has weaknesses, in most respects gave clear guidance for project implementation. It would have been helpful if the different elements of biodiversity had been identified. One of the significant features of Bangladesh biodiversity is its plant genetic diversity, This has not received the attention it deserves.

Little attention was paid in the design or its supporting documentation to the types of 'products' expected to emerge from the biodiversity management planning process. This is an important issue discussed later in this report. It can be argued that it was not necessary to be specific about this in the project design; that it was best left to project staff to interpret. Even so, the mission feels the plan uncertainty now apparent might have been pre-empted had there been closer guidance through the Prodoc. On the other hand, as one reviewer of the draft of this report has pointed out, it is also possible that the current situation could be the result of a conscious shift away from the approach indicated in the Prodoc.

At inception the Biodiversity Management Expert (BME) proposed a number of changes in Output and Activity detail. These changes were put before the first PSC meeting and were endorsed as an 'Operational' version – though it seems the original wording of the Prodoc is still in use.

In both the PRIF and the Prodoc it was emphasised that the project was intended to enable the DOE to build up a capacity to engage in an area of activity in which it previously had no engagement but in which it should, as the agency responsible for the Conservation of

Biological Diversity (CBD) and other international biodiversity conventions, have a role. Mindful of the fact that other agencies (notably Forestry) had existing roles in this area and also noting that the jurisdiction of other agencies would be affected by the BECA 1995, a key provision in the Prodoc was for interagency coordinating committees.

At project formulation the CWBMP was seen to represent “...a somewhat bold venture in that it is charting unknown waters as far as DOE is concerned. At its core, the project is about asserting the rights and responsibilities of DOE as defined under the Environmental Conservation Act (1995)—to play an active and managerial role in areas of environmental management where it has heretofore had minimal experience. The establishment of local and National ECA Committees was seen as essential in providing the forum for inter-ministerial co-ordination.

The terminal report of the BME (at page 14) pointed out that “*Fish biodiversity management activities are not elaborated to any great extent in the CWBMP ProDoc due to the inherent nature of GEF biodiversity projects’ focus on globally significant species. Nonetheless, fish and fishery conservation issues play a central role in the ecosystem approach to CWBMP’s ECA-site management plans, particularly in Hakaluki Haor and in the coastal sites’ shore-line fisheries. Fish sanctuary establishment and maintenance are envisioned to function as main support activities to ecosystem rehabilitation and to the building of ecosystem species’ refuges and gene-pools in CWBMP ECAs (again, particularly in Hakaluki Haor). Fish sanctuary management plan(s) will have particular significance within the CWBM ECA management plans.*” The mission strongly supports this point and is pleased to note that it has been acted on.

Project history

Over the first two years a part-time National Project Director (NPD), a Biodiversity Management Expert (BME) and two IUNV conservation management planners constituted the professional/technical Project staff. A termination report prepared by the BME revealed that, at that time (end of 2005) “*the CWBMP has been in operation for almost three years, although not fully functional for that whole period. This was due to project suspension in June – August 2004 and, prior to that, two periods of go-slow due to hesitation by UNDP to approve quarterly fund-requests due to inappropriate expenditures.*”

Working in partnership with the first NPD the BME had effected a competent start to the project and together the two did much to generate widespread awareness and understanding of the project. Unfortunately the late appointment of local professional staff (December 2004) meant that the BME and the IUNV conservation management planners had only limited opportunities to transfer information, understanding and skills to local staff.

Country ownership, stakeholder participation and beneficiaries

A strong sense of DOE ‘ownership’ is evident, and some evidence of ownership by cooperating agencies at local district levels. Yet there remains uncertainty, at national level, about the commitment of the range of agencies whose sustained support is needed for ECA management to be successful.

Three categories of beneficiary were identified in the Prodoc:

1. Local communities; particularly those participating in VCGs;
2. Staff of cooperating agencies, particularly DOE; and
3. Local universities, NGOs/CBOs/civil society, scientific and technical professionals.

There has been good engagement of VCGs, and staff of DOE have benefited. Staff of some other agencies have benefited at local government level through their participation in ECA coordination committees and, in some cases, cooperative conservation action on the ground – as in the case of destruction of illegal fishponds at Sonadia to enable mangrove rehabilitation.

At national level less progress is evident. The minutes of PSC meetings reveal poor participation by members of government agencies other than DOE.

NGOs contracted by the project to conduct PAPD activities and to undertake various related activities at community level have both contributed and benefited. Local universities and scientific and technical professionals of other research organisations have had no part in the project other than some University personnel having been granted access to project areas to survey wildlife.

Linkages between the project and other interventions

An important criterion in GEF funding is the presence of activities in the same or similar area as the project. This helps establish a basis for the incremental funding support that is the trademark of GEF projects. Earlier established activities that for CWBMP fulfilled this GEF requirement are:

- ‘Sustainable Environment Management Programme’ (SEMP) – with community-based wetland resource management in Hakaluki Haor;
- ‘Empowerment of Coastal Fishing Communities for Sustainable Livelihoods’ Project (ECFCP) – with community empowerment and livelihood security in ‘CWBMP coastal sites’, from Sonadia to St. Martin’s Island;
- ‘Conservation of Biodiversity, Marine Park Establishment & Eco-tourism Development at St. Martin’s Island’ Project, whose activities were expected to mesh well with the work of CWBMP’s ECA management plan development.

CWBMP collaboration was formalised at a high level with SEMP and ECFCP, with the SEMP Programme Coordinator and with National Project Directors of ECFCP and St. Martin’s Project included as members of the CWBMP Project Steering Committee. Both SEMP and ECFCP have now finished, with some of the communities that participated in the ECFCP having been provided further support to become VCGs. Also, some community centres established by the ECFCP have become Village Conservation Centres under the present project.

The Management of Aquatic Ecosystems through Community Husbandry (MACH) project addressed the same community based freshwater fisheries management situation as the

CWBMP faces at the Hakaluki Haor site. Yet it is unclear whether project staff tapped that experience, learned lessons and adapted appropriate approaches and methods of that project. Nor does there appear to be any project linkage with the Bangladesh wetlands network.

In his terminal report the BME (at page 13) had said *“it is important for CWBMP to interact with other projects' stakeholders for mutual exchange of experience of field and institutional situations. This is particularly important to do with community groups and field-located get-togethers ‘on site’ will provide the best setting for local level lesson-learned exchanges. Projects such as MACH ... should have relevant experiences to share with CWBMP. As part of the ECA management plan development process, opportunities for exchange with them must be explored and developed.”*

Yet another linkage from which useful experience and methodology could be tapped is the Bangladesh-based International Conference on Community Based Adaptation (CBA). Its focus is adaptation to climate change but it addresses the whole range of community engagement that is central to the CWBMP and would provide a useful context in which to share experience and compare methods.²

Project Management

Since sound leadership and high staff morale are such important elements of every project, after the uncertainties of the past and the unwanted gaps in project leadership the mission is encouraged to see good potential in the current leadership combination. The National Project Director, who is responsible for leading the project team, has a background in, and contacts with, District administration that are immensely valuable for ensuring that the necessary inter-agency coordination and support at local government levels is firmly established and sustained. The fisheries management background of the recently appointed Project Manager, coupled with his personal experience of having worked on donor-funded community based resource management projects makes him a valuable complement to the NPD's leadership. And these positives are associated with a DOE Director-General who has been instrumental in driving improvements in project engagement over the past two years.

The TOR of the NPD require him to be answerable to the PSC. The fact that this committee meets infrequently, and its' meetings so far have lacked the input of agencies outside MOEF, suggests he may not be receiving as much guidance and support as a project of such complexity requires. On the other hand as the project field units, the ECAMUs, are headed by DOE staff, he also has some responsibility to DOE. This arrangement is good in the sense that it promotes the DOE strengthening element of the project. However this places the NPD in a potentially difficult position regarding his responsibilities. This uncertainty needs to be clarified.

Among the project staff, who were very supportive of the evaluation mission's need for information and willing to respond to requests for data and reports, the evaluators sensed staff morale was not of its best. One factor in this clearly is salary. Project staff are not being

² The next conference, organised by the Bangladesh Centre for Advanced Studies (BCAS), the International Institute for Environment and Development (IIED) and The RING alliance of policy research organizations is from 22 to 26 February 2009. See <http://www.bcas.net/2nd-cba/index.html>

paid the full amount specified under NEX arrangements and it seems approaches to the government to rectify this matter have met with a compromise that still leaves staff disadvantaged as compared with those holding permanent positions within DOE. This has been the direct cause of a high project staff turnover that further weakens project progress.

There is little the mission can say about financial management, though it notes annual audits have been undertaken. A request to project management for a breakdown of expenditure by Output drew, as a response, a printout in a format based on the annual work plan using Activities that cannot be interpreted in terms of the project design.

Monitoring and evaluation by local communities

The Prodoc provided for field data to be linked to a “*Village Information Management System*” that would “...*feed a National Electronic Database developed by the project.*” It was expected that “*The benefits reaching to the participating communities in ecological critical area management (ECA) at every stage of the project cycle would be monitored with appropriate parameters ...*”

Throughout the Prodoc are references to the local user communities as being the base for field monitoring. From “Engaging Local people in monitoring activities” (Annex 4, page 28): “*Another important area of involving people is to engage them in monitoring the change of wild life in their conservancy area. ... In building the capacity of the team engaged in monitoring, the training will encompass ... developing simple and verifiable impact indicators, training in basic field biology, recording and reporting techniques. Efforts to achieve full participation of women in all of these activities will be key to the success of the project, given that they have the greatest involvement with and dependence upon homestead resources.*”

There has been a little action in this important area of engagement but as with other monitoring activities it is not as extensive as proposed and nor is it systematic.

Project monitoring and evaluation

“*Appropriate participatory mechanism and methodology for performance monitoring and evaluation will be established at the very outset of the project*” according to the Prodoc.

Yet both monitoring and evaluation, and database establishment are two key areas that remain undeveloped. Though an MES was appointed as long ago as February 2004 a monitoring and evaluation system was not produced at that time, and nor has it since emerged.

An 88 page PMU document titled “Implementation Monitoring and Evaluation” and dated 14th February 2008 provides a clear explanation of the purpose and methodology of monitoring and evaluation. Yet in the absence of verifiable indicators a “percentage achieved” estimate of progress has been used (Table 3.9), the approach being explained at page 22 “*The major sources of field information are the site level coordination meetings at each ECAMU ... also the monthly action planning and progress reports ...*” While percentage estimates of progress may offer some subjective guidance as to how a project is progressing this is not a satisfactory way of monitoring a project. It is not the method specified by UNDP and the

GEF Secretariat, and does not match the approach described in the PMU’s “Implementation Monitoring and Evaluation” document.³

A “Monitoring Plan” beginning at page 26 of this document includes what may be the first sign of an attempt to develop indicators suitable for project monitoring (Table 1.5, p.17). Being set at a generic level and, not quantified, these are simply precursors to indicators. They indicate the right direction, however. With this first step having been taken, a small group of project professionals working together in a ‘brain-storming’ manner could develop meaningful indicators and “means of verification” in the manner explained in the PMU monitoring document.

Shortcomings in monitoring and evaluation were not noted in the minutes of the one and only TPR held. But, then, this should have been a topic in which the PSC took interest – or UNDP, since UNDP CO was required to submit an annual APR/PIR using indicators provided by the project. There is no record of the PSC reporting on this weakness, let alone specifying action to be taken and UNDP CO passed on what was submitted to it by the PMU.

Great reliance is placed on the contracted work of NGOs, yet there is no provision for monitoring and evaluating the data and reports they produce.

This MTE was expected to serve as a means of validating or filling the gaps in the assessment of relevance, effectiveness and efficiency obtained from regular project monitoring. The absence of a proper monitoring system means this cannot be done properly. It can simply be stated that the project as designed remains highly relevant, elements of its implementation are relevant (mostly at community level); it’s effectiveness is limited and there can not be said to have been an efficient use of resources so far.

Role of UNDP country office

In a speech given at the inauguration of the project inception report in June 2003⁴ the UNDP Resident Representative, stated “*Bangladesh has not reached its full potential.*” However this was not a reference to potential for managing biodiversity, as might have been expected. He had calculated how much GEF funding other countries had been allocated and concluded “... *we should have 390 million dollars already.*” “*We are behind ...*” he complained.

Fortunately that view of the GEF as a treasure chest to be milked for dollars has since been replaced by a more mature attitude in UNDP. The CWBMP project is a firm fit with the UNDP Strategic Programme Framework for Bangladesh 2006-2010. The context described in this framework – “*competition for resources is intense ... carrying capacity of the natural resource base is under severe strain ... ecosystem restoration and regeneration ... through participatory management of common pool resources ...*” are precisely what the CWBMP project addresses.

³ Though the UNDP approach should be followed it can be helpful also to read other agencies’ guidelines on this subject. One example is at <http://www.usaid.gov/ausguide/pdf/ausguideline3.3.pdf>

⁴ Inception Report E6, page 24

This project also characterises the UNDP's overall Strategic Plan 2008-2010: Accelerating global progress on human development – in terms of strengthening “... *national capacity to manage the environment in a sustainable manner while ensuring adequate protection of the poor.*” Further, on the basis that “*climate change undermines development efforts*”⁵ the ECA management model that is to be developed through this project for coastal ECAs is, for UNDP, a potential base for affirmative climate adaptation activities.

Successful implementation of the CWBMP project review and reorientation recommendations made later in this evaluation report are crucial for UNDP ambitions at large.

Replication approach

The basic idea of the project was to “prove” a process for establishing and managing an ECA. There is some way to go before any of the project ECAs reaches the stage at which it can be said to be a model suitable for replication.

Results

A very good start was made to this project, largely due to the efforts of the Biodiversity Management Expert in conjunction with the NPD at that time. However, progress subsequently faltered. Over the past two years progress has been resumed and the project is now producing results in line with the direction provided in the Prodoc. Significant weakness remains in the areas of knowledge management and of monitoring and evaluation. Though considerable expertise in these areas is available through Bangladeshi organisations the project has relied on its own resources and has not reached out for assistance which could be obtained by networking with relevant other individuals and organizations.

The desired institutional arrangements for management of ECAs are mostly in place but need more time and effort to ensure they are functioning effectively. However, a casualty of the troubled early years of the project is the approach to conservation management planning which is now less community-driven than was envisaged.

An assessment by project Output follows. This draws on examples of project interventions. Not all of the many activities in which project staff have been engaged is discussed.

Objective 1: To ensure the conservation and sustainable use of globally significant wetland biodiversity at the Cox’s Bazar sites through their management as ECAs

Output 1.1 Utilizing existing legal mechanisms, legal protection is established for ecologically critical areas (ECAs)

⁵ UNDP Strategic Plan: 2008-101; para 115.

The first step in achieving this output was during the PRIF phase of the project -- the declaration of all three component areas of the Cox's Bazar site as ECAs under the Bangladesh Environmental Conservation Act 1995. This declaration included draft rules specifying restricted activities at the nominated sites -- rules that are in the process of refinement as more information becomes available.

Monitoring of rules implementation is uncertain, this being a casualty of the fact that an adequate monitoring and evaluation system is yet to be established. However there has been some decisive action to implement the rules; one notable example being a coordinated campaign with the assistance of other departments, and the Joint Forces, to destroy shrimp ponds illegally established in Sonadia mangrove habitat. This area has since been rehabilitated through planting activities by the project with the Sonadia community. Here, there has subsequently been rapid recovery of the mangrove ecosystem.

MTE mission assessment

The legal requirements appear to have been satisfied and decisive action has been taken to implement the initial set of rules, though without formal monitoring.

Output 1.2 An effective field-level management system is operated and maintained

An ECA Management Unit, or ECAMU, has been established in the town of Cox's Bazar, as a satellite office of the Chittagong regional office of DOE – staffed by a combination of project and DOE staff. This is as anticipated by the Prodoc, with GEF funds under this output utilised for recruitment of national experts to support and work with Government ECAMU staff; equipment; and training for ECAMU staff.

The ECAMU has begun to implement conservation measures, though conservation management plans as specified in GEF project document are still under development.

MTE mission assessment

Some progress has been made towards achieving this Output. The MTE mission met with an Upazila ECA committee in Teknaf that appears to be functioning well. However the mission is not in a position to establish whether Upazila ECA committees in general are active in guiding Union ECA committees at project sites. Another area of uncertainty is the extent to which ECAMU staff are absorbing the community-level experience gained by sub-contracted NGOs so they can assume roles in this area in the future.

Output 1.3 Village Conservation Groups and a Local ECA Committee are established to ensure local participation and inter-sectoral coordination for conservation

In cooperation with local NGOs/CBOs/Civil society, Village Conservation Groups (VCGs) have been established at each of the three project sites. Thirty four VCGs have been established at Teknaf Peninsula, four at Sonadia Island (a small area of only two villages) and six at St. Martin's Island. The VCGs include community members involved with the full

range of resource use in the area. Some VCGs have the use of Village Conservation Centres (VCCs) that utilise buildings established by a UNDP/FAO community fisheries project (ECFCP) that preceded the CWBMP project.

A considerable degree of conservation awareness raising activity has been conducted among VCG members. It is reported that, through them, other community members also benefit. The VCGs have been supported in the successful implementation of urgent conservation activities that include the protection of nesting habitats of globally endangered marine turtles through sand dune stabilization, the protection of turtle egg nests, and mangrove rehabilitation.

These achievements have been made possible as a result of cooperative efforts through District, Upazila and Union ECA Management Committees.⁶ Representatives of the VCGs, together with local government officials make up this committee which, at District level, is chaired by the District's senior administrator, the Deputy Commissioner. This gives it high status that is reflected down the line. The project field office acts as secretariat to this body. However it must be noted that these committees were established only recently, in 2007. It is too early to assess whether the arrangement is sustainable.

While Sonadia is given as an example, similar interventions at Cox's Bazar and Teknaf appear to have met with success and, to the extent that this could be tested by the evaluators in brief VCG meetings, the impact appears positive.

Since some conservation actions have required withdrawal of access to, and use of, areas placed under species or habitat protection the project has advised VCGs on alternative income generating activities. Micro-credit has been available through the project's Micro Capital Grant to support alternative activities.

MTE mission assessment

At District and lower levels the ECA cooperative management arrangements are in place and seem to be effective. On the basis of quick visits to some of the communities engaged in the project the evaluators are able to confirm a wide range of interventions of this type, and positive feedback from some of the affected community members. It is too early to assess prospects of sustainability.

Though some VCGs were established on a foundation established by a preceding project others have been in existence for only 18-24 months. It appears that good progress is being made. Access to the Micro Capital Grant is not yet available at all sites and this is a matter that needs attention.

Output 1.4 Ecological information concerning critical ecosystems at Cox's Bazar site is available to and used by managers

⁶ As per the Prodoc that stipulated "Membership will include, *inter alia*, key Government Ministries involved with management of natural resources, including the Department of Fisheries, Forestry Department and Ministry of Land."

Though some useful ecological information was gathered during the PRIF phase of this project, considerable additional information has since been obtained, and reported in numerous documents.

In the case of birds some good data has been compiled and trends are beginning to emerge. Other aspects of ecological monitoring are yet to be addressed. A systematic ecological monitoring programme has yet to emerge.

Government co-financing for the creation of a marine research laboratory on St. Martin's Island was made available in accordance with the Prodoc. Unfortunately, however, it appears that rather than supporting project objectives this facility has functioned separately.

MTE mission assessment

Unfortunately the utility of the data acquired, and access to this, is limited by the fact that the envisaged knowledge database is yet to be established. The absence of a database designed specifically for the type and range of data needed for this complex, cross-disciplinary project has meant that the different individuals and organisations (including several NGOs) are left to design their own data collection formats. Data collection formats should be designed to be compatible with a central data management system. This deficiency is tied in with a failure to establish a monitoring and evaluation system. The type of guidance needed to correct these shortcomings is available in Bangladesh. This difficulty could be overcome through networking and information exchange with relevant public and/or private institutions.

Output 1.5 A management plan covering conservation and sustainable use of Cox's Bazar ECA is developed and implemented

The Prodoc envisaged the identification of conservation zones at each component site that would include core protection zones, buffer zones and multiple use zones. This was to be followed by detailed site management plans, with emphasis on core protection and buffer areas within each ECA. This prescription has been followed to some extent, and the original zoning proposals developed by International UNV Conservation Area Management Planners have since been reviewed and amended as more information has become available. The mission sighted draft zoning proposals for Sonadia and for St Martin's Island. There was not time to examine these zoning arrangements in detail in relation to conditions 'on the ground' but the approach adopted seems reasonable.

The Prodoc anticipated effort to obtain Government co-financing and private sector support for a variety of infrastructural improvements associated with the establishment of a marine park at St. Martin's Island; items such as boat landings, elevated mangrove walkways, and improved communications. Similar developments, though on a smaller scale, were envisaged for Sonadia Island. The Prodoc was careful to state that "*Developments will be carefully formulated as part of and within the management plan preparation process*" and this point is relevant to points made, later in this report, regarding ECA planning (see **Putting the ECA concept into practice**). Resolution of resource use conflicts and other uncertainties at both

St. Martin's Island and Sonadia are needed before real progress can be made towards effective and sustainable biodiversity management in these areas.

MTE mission assessment

Results with this Output are mixed. Though there is, through NGO interventions, considerable engagement with VCGs in identifying biodiversity management issues and needs, the level of community engagement in planning for biodiversity management is limited. While the zoning proposals appear adequate, the guidelines for this need more clarity.

The documents referred to as "conservation management plans" are excellent source books but are not in a form suited to local level implementation. There are also gaps in these drafts yet to be filled. A clear definition of marine boundaries is lacking and mission members received varying responses to questions on this matter.

It is uncertain whether the project has any linkage with biodiversity conservation activities being carried out at St. Martins by Jahangir Nagar University, financed by FAO.

Uncertainty concerning the rights of Sonadia communities to use government land need to be resolved. Their status is "illegal", which is not unusual for settlers on government land. What is more concerning is that the mission understood from a meeting with forestry officials that these communities had been listed for eviction.

Output 1.6 Alternative sustainable livelihood and sustainable use strategies are developed and implemented

This output, co-financed through a UNDP/GOB project, "Empowerment of Coastal Fishing Communities for Livelihood Security", provided an effective "kick-start" for the CWBMP project through its support for the development of alternative sustainable livelihoods within fishing communities throughout the Cox's Bazar ECA site. These communities are the major source of direct anthropogenic pressure on resources and biodiversity. Many of the VCGs since established are biodiversity management versions of the community structures developed for fisheries management.

There has been an active engagement of project sub-contracted NGOs in encouraging and supporting alternative livelihoods. Support has been provided in areas such as micro-enterprise development, marketing, savings and credit. Packages for alternative livelihoods included beef fattening, poultry rearing, homestead gardening and small scale agro-processing.

MTE mission assessment

Some progress has been made in this area, though strategies for sustainable use of resources are yet to be developed and implemented. The evaluators were struck by how restrained VCG members are in accessing available credit. Such caution is to be commended. However it raises a question as to how effectively the fund is being used. While the evaluators heard of positive examples and made a quick scan of VCG registers of transactions they were not in a

position to investigate closely how the credit facility operates. Even so, the mission considers the amount of Micro Capital Grant is too small for AIG activities to be sustained and, so, it supports a proposal for increasing the Micro Capital Grant discussed at the third meeting of the PSC.

Output 1.7 An integrated pest management programme is implemented

The Prodoc specified that UNDP would provide support for the extension of integrated pest management (IPM) methods to coastal agricultural areas along Teknaf Peninsula. This involved farmer field schools and training for farmers in IPM. At the project sites, it was to be linked with the Village Conservation Groups in order to maximise the impacts on awareness and practices. This is reported to have been done.

MTE mission assessment

The agricultural extension support being given to VCGs is commendable and it is understood that local Agriculture Department extension officers are also engaged. It is hoped that this is an indication of continued departmental support after project completion.

Objective 2: To ensure the conservation and sustainable use of globally significant wetland biodiversity at Hakaluki Haor through its management as an ECA

Output 2.1 Utilizing existing legal mechanisms, legal protection is established for Ecologically Critical Areas (ECAs)

As is the case with Output 1.1 this first step was achieved during the PRIF phase of the project, i.e. the declaration of Hakaluki Haor as an ECA under the BECA 1995. This declaration included a few generalised draft rules specifying restricted activities at the site. These rules are in the process of refinement as more information becomes available. Monitoring of rules implementation is uncertain, this being a casualty of the fact that a monitoring and evaluation system is yet to be firmly established.

MTE mission assessment

As with Output 1.1 the legal requirements appear to have been satisfied and firm action has been taken to implement the rules. As with other aspects of the project, formal monitoring is a weakness that needs to be addressed.

Output 2.2 DOE operates and maintains an effective field-level ECA management system

The project supports an ECA Management Unit, or ECAMU, in the town of Kulaura not, as specified in the Prodoc, the District Headquarters of Moulvi Bazar, the District that

encompasses the larger part of Hakaluki Haor. This has brought the office closer to the project site. However it has generated a secondary complication in that the oversight of the ECAMU by a senior DOE officer is provided from a base in Sylhet District, which is distant about one-and-a-half hours' drive.

MTE mission assessment

The Kulaura field office has been satisfactorily established and is in operation. However the separation of the ECAMO from the project team, coupled with his being distracted by his other duties reduces his effectiveness as team leader and this shows in reduced team morale.

Output 2.3 Village Conservation Groups (VCGs) and a Local ECA Committee are established to ensure local participation and inter-coordination for conservation

The Prodoc envisaged the establishment at strategic locations surrounding the Haor of 5-7 VCGs. The active engagement of NGOs in a participatory action planning process has resulted in the establishment of 28 of these village based organisations having a total membership of 989. The total population of the Hakaluki Haor “catchment” is 190,000. The highest percentage of households is engaged primarily with farming (42% are owner farmers and sharecroppers), followed by (28% full and part-time fishers), petty traders (11% - including small business, stocking, handicrafts, etc.) and day labouring service (7%). Those directly using the resources of the haor are the fishers (53,200) plus many of the farmers.

The project has supported meetings of the VCGs, and worked to raise awareness among their members.

Some training has been provided and the VCGs have implemented a series of ‘urgent conservation activities’ (see Output 2.5 below). These include freshwater swamp forest and reedland regeneration; and community-based enforcement based on the Wildlife and Fisheries Protection Acts; eg confiscation and destruction of illegal fishing nets.

MTE mission assessment

On the basis of quick visits to some of the communities engaged in the project the evaluators are able to confirm a wide range of interventions of the type envisaged in the Prodoc and positive feedback from some affected community members. The mission is impressed by the thoroughness of the approach to community engagement as illustrated by an excellent stakeholder analysis undertaken and reported. While it is too early to assess prospects of sustainability a good foundation has been laid.

Only a very small portion of the total population dependent on the resources of Hakaluki Haor is represented in the VCGs. This leads to a major question as to how a local management plan can be effective unless “community empowerment” is extended to other

resource users on whom the project has impacted only indirectly through awareness materials.⁷

At District and lower levels the ECA management arrangements are in place but are yet to be shown to be consistently effective. Divergent opinions about project approach and prospects presented at an Upazila meeting attended by the mission in Kulaura indicated a need for more effort to have its membership informed, engaged and committed.

Output 2.4 Ecological information concerning critical ecosystems at the Hakaluki Haor site is available to and used by regional and national-level managers

There is no database, the first activity listed for this Output. Though some monitoring of certain species has been done (eg birds, Gangetic dolphin) with the assistance of volunteer groups, including University staff and students, there is no overall ecological monitoring programme and nor is there an information management system – both specified in the Prodoc as required Activities.

MTE mission assessment:

As is described for Output 1.4, above, though useful ecological information was gathered during the PRIF phase of this project, and additional information has since been reported by partner NGOs, the usefulness of the data acquired and access to it is constrained by the fact that there is no effective knowledge database. However, some useful awareness products have been developed and distributed and good supportive media coverage has been achieved.

Output 2.5 A management plan covering conservation and sustainable use of Hakaluki Haor ECA is developed and implemented

The Prodoc envisaged a detailed site management plan that would include the identification of critical bird and fish habitat as “biodiversity overlays”. Additional conservation activities envisaged included on-farm conservation of traditional crop varieties, management of fish sanctuaries and bird areas, and community-based integrated water management. VCGs were to play an active role in implementation of these activities.

A draft conservation management plan was developed by an International UNV Conservation Area Management Planner and this is under review. The evaluators sighted draft zoning proposals for Hakaluki Haor and, though not in a position to check proposed boundaries against conditions ‘on the ground’, found no reason to question the proposed zoning.

⁷ The situation differs to some extent in the Cox’s Bazar-Teknaf ECA since there are linkages with communities engaged through an earlier project (ECFCP).

Several studies have contributed to definition and understanding of the situation at Hakaluki Haor. Notable among these is an economic resource evaluation undertaken by one of the project partner NGOs that addresses the area's conservation values in terms of economic, ecological and social benefits for local communities and for the nation at large. It assists understanding of inter-linkages between economic and ecological functions of the haor system, provides a 'value' for measuring change in the quality of the environment and also offers a bio-economic model that describes interactions between people, resources and economic activities.

The results of this study are crucial for the development of a rationale for the government to permit user communities to be issued with fisheries leases over Hakaluki Haor rather than, as is standard practice, issuing these to absentee lessees better placed to make the lease payments on which the Lands Department is focused. Formal application for this change has been made by DOE on the basis of project findings.

The Prodoc called for the implementation of conservation activities specified by the management plan and suggested that these would likely include crop germplasm conservation, management of fish sanctuaries and bird areas, and community-based integrated water management. The first of these could make a significant contribution to conservation of genetic biodiversity though it appears not to be included in the suite of interventions now underway or intended. Fish and bird sanctuary areas have been identified and there is progress towards their establishment.

MTE mission assessment

Good progress has been made towards gathering information for a management plan, but the plan itself is yet to be finalised. The community engagement process is not, as it should be, directly linked to the development of this plan.

The Prodoc expectation that crop genetic diversity be addressed is yet to be fulfilled. However, an interesting and praiseworthy related conservation initiative taken is the establishment of a demonstration garden of some 200 medicinal plants.

Community ownership involving benefit sharing and use rights of common property resources is needed and requires firm government support against elite private interests in these resources. Some progress has been made towards achieving community "ownership" of fisheries resource management through fisheries lease arrangements. Success in this area is seen as crucial for the sustainability of biodiversity conservation efforts at HH. Once finalised, the community leasing arrangement, similar to that developed under the MACH project, would be a valuable contribution towards developing strategic policy for management not only for this haor but as an example for similar wetlands elsewhere in Bangladesh.

Output 2.6 Alternative sustainable livelihoods and sustainable use strategies are developed and implemented

There has been an active engagement of project sub-contracted NGOs in encouraging and supporting alternative livelihoods. Support has been provided in areas such as micro-

enterprise development, marketing, savings and credit, and there has been work on strategies for sustainable use of resources.

MTE mission assessment

As with 1.6 some progress has been made in this area, though strategies for sustainable use of resources are yet to be developed and implemented. The mission examined some alternative livelihood activities in beef fattening, homestead gardening, and small business development by women. The amount of Micro Capital Grant is too small for AIG activities to be sustained and the mission supports a proposal for increasing the Micro Capital Grant that was considered at the third meeting of the PSC.

Output 2.7 An integrated pest management programme is implemented

The mission was advised that integrated pest management methods had been extended to the Hakaluki Haor area through farmer field schools and that this separate project was linked with the Village Conservation Groups in order to maximise its impacts on awareness and practices.

MTE mission assessment

The mission's assessment is as for 1.7. viz; The agricultural extension support being given to VCGs is commendable and it is understood that local Agriculture Department extension officers are also engaged. It is hoped that this is an indication of continued departmental support after project completion.

Objective 3: To support efforts by DOE to institutionalize the concept of ECA management using the experience gained through the above demonstration sites

Output 3.1 Ensuring that legal mechanisms at national level are able to support operationalization of ECA concept

An initial set of ECA guidelines has been legally established as a Ministerial. notification. More detailed rules have been drafted, though final stakeholder consultations have not been completed. The Prodoc provided for an assessment of the role of a possible new environmental court, though local courts at Dhaka, Chittagong and Sylhet have accepted cases under the BECA Act.

The terminal report of the BME (at page 6) recommended that further legal measures be taken to ensure ECA management activities are effective, emphasizing that "... *the concept of ECA protection is that of a cross-cutting application involving many agencies' mandates.*" His conclusion was that "... *unless this central issue is addressed and effectively handled, sustainability of the project's outcome is in question and a positive impact of project activities is not assured.*"

Three years later, the BME's report can be seen to have anticipated issues identified by the evaluation mission. In words with which the evaluation mission agrees, he wrote: "*Sound ECA management will require a wide range of administrative and technical activities involving several government agencies and other organizations in collaboration under the coordination of DoE.*"

He goes on to say: "*It is generally acknowledged in Bangladesh that this kind of inter-agency collaboration for natural resource management has been, and is, very difficult to implement in practice. Underlying these difficulties is that cross-sectoral collaboration in natural resource management, sooner or later involves several types of legislation, where queries of enforcement, of establishing lines of responsibilities and of equity in benefit-sharing come up. Until these basic management issues are solved, plans for ECA/PA co-management might only remain as ideas on paper. A clear ECA legislation and authority is urgently needed.*"

"The ECA concept envisions that ECA management is coordinated by DoE. ... The management plans that CWBMP will be formulating will presumably require the agreement of these agencies on management implementation modalities. Again, clear and solid ECA legislation is required as support."

MTE mission assessment:

The BME's sensible comment and advice regarding cross-sectoral coordination and cooperation, and legal backing for this, are of fundamental importance. It is understandable, in the mission's experience, that it has proved difficult to get a truly representative meeting of the PSC, and that it will also be difficult to convene the national level ECA Committee. New ideas to foster inter-agency cooperation are needed.

Output 3.2 Policy formulation and analysis concerning ECAs is based on an appropriate integration of economic and social factors

This output is focused on the development of policies towards ECAs -- in particular, the further development of criteria and plans for selection of ECAs. This is in anticipation of replication of the concept. The mission found that the legislation under which the ECA concept is being put into practice is open to interpretation and the attempt to operationalize ECAs simply as protected areas means the full potential of the concept is not being utilized. The ECA concept is a subject of further discussion under **Recommendations and their rationale**, below.

An investigation of ways of ensuring the sustainable financing of ECAs is yet to be commenced.

To date, project resources have been directed towards assessment of project site ECAs. More effort is needed to clarify application of the concept to these sites as a basis for developing criteria and guidelines that can be applied to other ECAs containing biodiversity of global significance. Most progress has been made at the Hakaluki Haor site where an economic valuation and prioritization of globally significant biodiversity as factors in the

selection and management of that ECA represents a major advance towards underpinning conservation goals with economic justification.

It appears that there has as yet been no examination of the use of economic instruments such as user fees and penalties for biodiversity conservation within ECAs. However, precedents have been set in that in some cases of violation of environmental rules a local court has imposed penalties under the BECA Act.

Some incentives for community protection of natural habitats have been implemented – mostly in the form of alternative income generating activities financed through project credit.

Another intended element of this Output is a resolution mechanism for conflicts over resources. The project currently is focused on avoidance of conflict by working through District, Upazila and Union ECA management committees that include in their membership the full range of use interests, and VCGs. The Prodoc calls for an additional activity -- means of addressing actual or potential conflicts with other, sectoral-based legislation. No action has been taken on this matter.

No ECA policy analyses have yet been prepared and, accordingly, the national-level inter-sectoral ECA Committee envisaged has not met to consider such policies. However, an ECA management ‘cell’ has been created, reporting directly to the Director-General DOE, and one of its roles is to prepare draft policies for submission to the national committee. Details of this “cell” which is an addition to the administrative arrangements specified in the Prodoc, are at Annex 5.

MTE mission assessment

Some progress has been made towards achieving this Output and the mission notes the initiative taken to create an ECA management cell that is designed to facilitate the institutionalization of ECA management in the DOE. The mission assesses that this is a good move provided it does not impede the effectiveness of the national inter-sectoral ECA management committee designed to foster cross-Departmental cooperation. This is a significant initiative that will need to be sanctioned by a TPR. The establishment of an explicit linkage between this national ECA committee and government’s Development Committee would, in the opinion of the mission, be a wise step.

Output 3.3 Strengthening capacity for management of ECAs

The Prodoc specifies that as part of a broader project training needs assessment, those training needs related to the management of ECAs are to be assessed as a basis for the design and implementation of a training programme. There is yet to be an assessment of training needs.

A field study visit was made to Vietnam to examine examples of multiple use protected areas, and another, to Nepal, in which 19 individuals participated. Participants reported they found the experience relevant in that, through examination of mangrove rehabilitation at Cam Gio it inspired their own efforts at Sonadia ECA. Community engagement in coral

conservation at Nha Trang Bay and Cu Lao Cham Island guided similar project interventions at St Martin's Island ECA.

No workshops on ECA management have been held as proposed but, then, the issues are still being worked through and it is probably too early for this to be done.

MTE mission assessment

Nineteen in Nepal appears to have been an excessive number and suggests this may not have been an effective use of training funds. No further international study visits are needed. It is necessary to concentrate on capacity development 'at home' – beginning with the long overlooked training needs assessment. This is now an urgent need to assess individual as well as Departmental capabilities, and opportunities for enhancement of skills and understanding. Suggested target groups for capacity building: 1) officers of DOE and of other Departments that have key roles in ECA activities such as Forestry, Fisheries, Wildlife, Lands and Tourism; 2) relevant local government officers; and 3) VCG members and other users of resources in ECAs. A separate training needs assessment is required for each group.

A strengthening of the relationship with the Department of Fisheries and Livestock and with the Department of Agriculture at the District and Upazila levels is a pressing need. Training of DOE officers and their counterparts of other departments together would assist the development of the cross-sectoral 'mentality' that is so crucial to sustainable ECA management.

Output 3.4 Awareness

This output was to be focused on disseminating information about the ECA concept and its implementation to relevant parties within the Government and private sector. Considerable effort has been made in this respect, particularly during the early years of the project. There have also been achievements in local level awareness handled on a site-specific basis, through print and radio.

MTE mission assessment

A suggestion in the BME terminal report (page 13) is supported: *"...that an 'awareness component' of CWBMP is developed with articulated targets and contents ... through a short-term assignment by a sub-contracted expert in the field of natural resources awareness."*

Once the model for ECA management is finalised a new round of awareness activity will be needed.

Since the mission has identified a need for review and reconsideration of some methods and approaches it is best if no action is taken to distribute information on these until a later date. However, there is no need to suspend the distribution of good value biodiversity management awareness materials.

Output 3.5 Implementation of Project start-up, Operations and Development

This Output is not included in the Prodoc but was added by the TPR following a recommendation in the Project Inception Report. No description or Activities for this Output have been sighted.

The PMU is currently staffed by a full-time National Project Director, a Project Manager, Legal Expert and Monitoring and Evaluation Specialist, with support staff.

Four UNVs serve as consultants. International UNVs are a marine ecologist based at Cox's Bazar Field Office, a wetland ecologist at the Field Office in Kulaura, and a biodiversity knowledge management specialist attached to the PMU. A national UNV serves as communication officer in the PMU.

The Cox's Bazar Field Office has specialist staff in agriculture, marine fisheries, horticulture, ecotourism and community development. Its Teknaf Field sub-office includes specialists in agriculture, horticulture, fisheries and community development. The Field Office in Kulaura supports project activities at Hakaluki Haor with specialists in agriculture, fisheries, horticulture, wildlife, ecotourism and community development.

NGOs were sub-contracted to undertake community mobilisation for ECA management in each of the four sites. Contracts specified the following core components: socio-economic baseline study; stakeholder identification; problem consensus; problem prioritisation and identification of urgent conservation activities; solution analysis, consensus building, defining user group roles and responsibilities, developing conflict resolution mechanisms, and village boundary mapping and natural resource/conservation mapping. The process extended to identifying natural resource management issues and needs but was not specific about the next step – community based management plans.

It had been agreed in the context of the incremental cost analysis that the Government would contribute manpower from the beginning of the project to staff the ECAMUs. This did not eventuate until later. Under recent, more active, DOE administration the condition that permanent posts would be created within the staffing table has been acted on. A government decision on this is awaited.

MTE mission comment

It is important to ensure that DOE staff are assimilating the information and understanding gained through the NGO interventions. This could be tested in the context of the recommended training needs assessment.

An impressive range of activities in planting, mangrove regeneration, conservation awareness, promotion of earthen cook stoves, homestead horticultural gardening, establishment and boundary marking of sanctuaries for birds, fish, turtles, has been carried out. However it has been difficult to distinguish which of these were NGO implemented under now-completed contracts and which were interventions in which project staff had substantive roles. Answers to these questions are important as they are pointers to long-term sustainability of results under DOE administration.

Recommendations and their Rationale

Assessing the past so as to progress the future

An indicative seven year work plan mapped out at project inception (at Annex B; item SL24) made provision for an internal mid-term review of progress. This was a wise provision and the findings of this evaluation confirm the necessity of such an exercise. In addition, there are matters such as data gathering, uncertainty about a project database, a reconsideration of the conservation management planning process, a need to forge a stronger inter-agency commitment to the ECA concept, and the development of linkages with expertise available in local research organisations and universities that need to be considered.

Recommendation 1: A thorough review of progress, of approaches and methods is recommended. This should include a training needs assessment of project professional and support staff that was stipulated in the Prodoc. These and other actions are needed to bring some fresh thinking to old problems, to reorient project staff and so establish a smoother and surer path for future progress. Some thoughts on how this might be approached are outlined below under **Review for project improvement**.

Putting the ECA concept into practice

The provision for declaration and management of ecologically critical areas in Bangladesh is a bold, ambitious, and far reaching move. Few countries have attempted this and most have established new statutory bodies to facilitate the necessary cooperation between the several government agencies involved. The Bangladesh approach is more challenging – specifying a single department as the responsible agent – so placing stronger emphasis on that department’s ability to achieve sustained interagency cooperation. In the Prodoc, emphasis was properly placed on an active consultative interagency committee structure designed for cooperation so as to avoid conflicts over jurisdiction and to encourage contributions from all affected agencies.

Though an ECA is commonly seen in Bangladesh as a form of ‘protected area’, in practical terms it can also be viewed as a special management planning area in which biodiversity conservation is the focus and in which all other developments must be designed, implemented and managed with a view to maintaining and even enhancing biodiversity. An overall ECA “outline” plan could include provisions that provide general guidance for all developments in that area (roads, towns, industries, agriculture, etc) in the context of maintenance of biodiversity values. Set within the broad scope of such an overall ECA plan, then, would be the “conservation management plan” that is currently the focus of project attention.

Ecotourism features in two of the project ECAs (Cox’s Bazar and St Martin’s Island), and project initiatives have been taken to support this in a manner consistent with maintenance of biodiversity values. Yet despite the powers entrusted to the DOE through the BECA in regard to all developments on St Martin’s Island the evaluators have been led to understand that disruptive tourism development is rapidly undermining prospects for successful ecotourism-based biodiversity management there. Similarly, the long tract of beach

extending south from Cox's Bazar appears to be at risk from unplanned private building developments. Little damage has yet been done here, but there is danger in the trend being established. If the ecotourism potential of these two ECAs cannot be protected and developed then there is a risk that the ECA model, and the legislation on which it is based, might be demonstrated to be ineffective.

Recommendation 2: Consider promoting greater inter-agency cooperation by exploring administrative and legal means by which existing fisheries, agriculture and/or lands officers can be engaged more directly in ECA management – through legal authority to assist DOE officers in enforcing ECA rules under DOE oversight and/or through secondment arrangements.

Recommendation 3: Undertake a thorough assessment of whether ECA criteria can be met at St Martin's Island in the face of over-development of tourism facilities and of terrestrial habitat damage reported arising from uncertainties regarding the status of government land on the island. Use the results of this assessment as a basis for deciding whether continued engagement here has a realistic chance of success. If not, after establishing a good level of coral ecosystem protection at this site, withdrawal might be an appropriate action so as to protect the reputation of the ECA concept and model.

Biodiversity

The biodiversity that is the target of conservation actions is made up of genetic diversity, species diversity, and ecosystem diversity – and the term “biological resources” is used for those species of biodiversity that people use. The term “biodiversity” is not defined in the Prodoc, possibly on the assumption that those engaged in implementation would understand what was intended. A species focus with close attention to distinctive species of national and global importance gave the project the “incremental edge” needed to justify GEF funding, though this was at some risk to a broader, more comprehensive approach to biodiversity conservation.

One excellent example of genetic biodiversity that has been identified and managed for recovery through the project is the “wild rice” (*Porteresia* sp.) at Sonadia ECA. It is probable that the Hakaluki Haor site harbours *Oryza* rice varieties that have evolved locally but are being displaced by introduced, higher yielding varieties. In the course of other project activities that address species and habitats there have probably been some inadvertent gains for genetic and ecosystem diversity. However, much more could be achieved if all categories of biodiversity were to be specifically addressed.

Recommendation 4: The genetic biodiversity of ECA sites be identified and their management needs addressed.

Recommendation 5: Make the governments of Australia and Japan aware of CWBMP project measures to boost the populations and to facilitate the movement of the very migratory birds that are protected through the bilateral Japan-Australia Migratory Birds Treaty and seek those countries' cooperative support in shared global conservation responsibility.

Conservation management planning based on users of biodiversity

A community based approach to conservation management planning was indicated in the Prodoc, the PRIF that preceded it, and in the Inception Report. For instance, the role of VGCs, as expressed in the Prodoc, is⁸ “...to develop and implement their own sustainable biodiversity management schemes with technical assistance from the project, linking up with local government institutions, village organizations and co-ordinating all resource extractive activities.”

Elsewhere in the Prodoc (Page 80), beneath a heading “Involving people in local level Planning and building their Management Capacities” is stated: “...involve them in developing the local level conservation plan ... which will be the basis of the total management plan of the conservancy (of a particular site) ... villagers/ local people will contribute to developing a conservation plan for their own according to the conservation needs of their area ...”

This was consistent with the earlier NEMAP process that had “placed special emphasis on the participatory approach to planning. ... The project development process followed a phased, bottom-up approach, beginning and ending with grassroots-level stakeholders” (Prodoc Annex 4).

A history of delays, multiple changes in NPD, and other uncertainties, has meant that in some respects the planned sequence of project Activities has been disrupted. One consequence of this is that the planned gradual build-up to ECA plans from a community base has slipped out of phase.

At the time of project formulation the DOE, newly engaged with community development, lacked experience in this area. It was decided that the best way to overcome this would be to engage NGOs that had accumulated a wealth of experience in community engagement. The assumption was that community development officers engaged directly by the project would provide oversight and be the avenue through which DOE would absorb the NGO experience and so develop the in-house capability necessary for it eventually to take over this role in ECAs. The risk, though not identified at the time, was that the NGO output might be treated as an end in itself, with the valuable community engagement experience being lost to DOE on contract completion.

The NGOs sub-contracted for this purpose based their interventions on a tried and tested Participatory Action Plan Development (PAPD) process. This engages a community and other stakeholders in prioritizing and analyzing their problems and then preparing a consensual action plan based on the prioritized solutions identified.

Participants in the PAPD process were encouraged to follow a checklist to identify the status of resources, the condition of the resources in the past (over the last 15-20 years), the present and in the future (20 years from now), problems relating to natural/aquatic biodiversity resources and possible solutions, with participatory interventions to solve the problems. “Finally the community developed a village based plan by discussing among themselves regarding solutions to problems.” (p.68) All 72 VCGs of the project have been engaged in the PAPD exercise. Twenty two Union based “action plans” have been developed through the PAPD process – up to a point at which biodiversity issues have been identified. However these

⁸ Underlining inserted by the evaluators for emphasis

have not been addressed in the manner necessary for a conservation management plan -- the NGO contracts did not specify this as a requirement.

Practical community based plans for the management of biodiversity are yet to emerge. The PAPD is an excellent process⁹ and appears to have been competently implemented by the project sub-contractors. It has guided communities to a point where they understand their situation in respect of biodiversity and probably know and understand what actions are needed to manage that biodiversity. But the important next step -- a simply worded plan that spells out those actions, identifies responsibilities and specifies the external support that will be provided -- is yet to emerge.

A fundamental point here is that planning was intended to be from a “grass roots” base, with plans at this level consolidated into Union level, Upazila level and then ECA level plans. At least this is how it should be “seen to be done”. In practice, however, there needs to be parallel thinking at a higher level of planning, with some guidance feedback to community level so as to ensure there are consistent approaches, and standard formats for plans -- and so that the full range of biodiversity management issues is addressed.

At the ECA level the project has prepared separate “sectoral plans” for the Hakaluki Haor ECA (fisheries, plant biodiversity, and freshwater swamp forest) and there is also a draft conservation management plan prepared in 2006, prior to these “sectoral plans”, and a recent draft zoning plan. It is good that these reports, in draft, were workshopped with a group that included academics. It is understood that a merging of this information is proposed but it is not clear how this exercise will be related to the Union plans and the VCG level planning exercise. Though a great deal of the information required for good management plans has been obtained, the mission gained an impression that the process was not clearly defined.

A draft “conservation management plan” was prepared for each of the other three project ECAs also and their draft zoning plans have recently been updated.

Project staff would find guidelines issued by the Ramsar Secretariat for management planning for wetlands to be useful.¹⁰ These state that “*Management planning must be regarded as a continuous, long-term process. It is important to recognize that a management plan will grow as information becomes available. Planning should begin by producing a minimal plan that meets, as far as resources allow, the requirements of the site and of the organization responsible for managing the site, and no more.*” The points that the mission wish to emphasise here are ‘process’ and ‘minimal plan’. Project staff may have tried to achieve too much, too soon. It may be that the volume and complexity of information at hand is actually inhibiting clear thinking about an effective conservation management planning process.

More from the Ramsar Secretariat: “*In time, as further information is collected and resources become available, the plan can grow, and may eventually meet all site management requirements. The planning*

⁹ Steps involved in a PAPD: Problem Identification; Ranking of the problems; Problem Census; Clustering of the problems and prioritization; Selecting the solution; STEPS Analysis; Stakeholder Analysis; Consensus building; and engagement in a range of biodiversity conservation activities.

¹⁰ This, and further detail, is available at: http://www.ramsar.org/key_guide_mgt_new_e.htm#top

process is adaptable and dynamic. It is essential that the plan change, or evolve, to meet changing features, factors and priorities, both within and outside the site.”

The troubled earlier days of project implementation appear to have thrown the process out of sequence. Among other things, this has resulted in a disconnect between grass roots planning and planning at higher levels. A three and a half year period was specified for this planning process in the indicative seven year work plan outlined at inception – and it was intended that IUNV planners would work together with national professionals. Delay in the appointment of the latter meant that the IUNVs ended up working in relative isolation. They produced large compilations of very useful information, together with good draft management prescriptions and zoning recommendations but there was an insufficient community base for this work. The “cart” was effectively positioned before the “horse” in these early days (or was it the plough before ox?). Project staff are now forced into a difficult situation, not of their own making, where they are trying to piece together fragments of planning in an effort to form a coherent whole and to make it relevant to communities that have not been fully engaged in the process.

Recommendation 6: Review and reconsider the conservation management planning process and develop a revised and simplified approach that improves chances for the empowerment of resource user communities, the engagement of all other stakeholders and also includes provision for management of cultural, historical and religious sites in ECAs.¹¹

Recommendation 7: Engage an appropriately qualified and experienced social scientist to undertake an independent assessment of the impact of the PAPD process, with regard to 1) its effectiveness as a basis for biodiversity conservation management planning and 2) how VCG understanding and commitment extends to other users of ECA biological resources who are not engaged as VCGs.

Recommendation 8: When in final draft form each ECA plan, with its related Upazila, Union and community plans, could benefit from an independent assessment of its social impact. This would also confirm its credibility.

Institutional arrangements

The project is based on DOE roles described as “...*coordinating implementation of the BECA 1995, and overall policy and planning, inter-ministerial coordination ...*” (Prodoc, page 6).

The Prodoc envisaged the establishment of a **National ECA Committee** as an inter-sectoral channel of communication between MOEF and other Government ministries with potentially overlapping interests within ECAs. The Committee was to meet every year and to provide MOEF with a vehicle for communicating ECA-related policies -- including plans for establishing new ECAs, issuance of new or revised regulatory restrictions within existing ECAs, management plans, etc. -- to line ministries. Membership of this committee was determined and formal notification of its establishment made by the DOE on 10th March, 2003. Five and a half years later, it has yet to meet.

¹¹ The leader of the MTE mission recognised ancient middens on the ocean beach of north Sonadia Island. He provided a fragment of pottery from that site to the NPD to use as a basis for discussion with Department of Archaeology.

The national committee was in addition to the usual national level **Project Steering Committee** (PSC), responsible for overall project oversight, chaired by the Secretary, MOEF and with a membership of all members of the National ECA Committee, as well as the Deputy Commissioners of Cox's Bazar and Moulvi Bazar Districts, a Project representative, representatives of UNDP/GEF, associated projects and sub-implementing agencies (SIAs) and representatives of other relevant Ministries, the private sector, industries, local NGOs/CBOs/Civil society. The PSC has met on three occasions (19 January 2004, 30 March 2005 and 29 August 2007). Attendance lists, however, show that attendance by members of agencies other than those represented by DOE has been very limited. Most of these agencies have never sent a representative to a PSC meeting.

At the first PSC the NPD suggested a technical advisory group was needed to feed advice to the National ECA Committee (Inception Report, page 51). It may have been this intervention that led to the establishment of an **ECA Management Cell** in the DOE (terms of reference at **Annex 5**. This "cell" does not have the cross-agency membership needed for a technical advisory group for ECAs in line with the philosophy of multi-stakeholder engagement spelled out during project formulation. However it does have a role in advising the National ECA Committee.

The mission is of the view that the ECA concept could be placed on a stronger footing within government if the National ECA Committee were to be linked with government's Development Committee.

A **Project Management Unit** (PMU) is located in the Department of Environment headquarters in Dhaka. The Prodoc envisaged a project team under the leadership of an NPD. Here lies the crux of a problem that has long frustrated project progress. There have been five NPD appointments; three of these having been only part-time while continuing to carry other duties. All, for some of their tenure have had also to bear the responsibility of project management when no NPC/NPM was at post – and the project now has its third NPC/NPM.

Though there has been significant progress over the past two years it has not been possible to completely overcome the troubled earlier years. One of its negative impacts is an uncertain, perhaps out-of-phase, approach to conservation management planning (discussed above). Another is a mood of uncertainty within the PMU about lines of responsibility. It may also have been a factor in the failure to establish a database or a fully effective monitoring system (discussed elsewhere; see **The Project Overall**.

District level ECA Committees have been established in Cox's Bazar and Moulvi Bazar District Headquarters to ensure coordination with and among the full range of District-level Government departments relevant to a particular site. The Deputy Commissioner of the relevant District chairs meetings of this Committee.¹² **ECA Committees** have been established also at Upazila and Union levels, matching the local government structure. Some seem to function reasonably well. There seem to be no difficulties in getting officers of other agencies interested and engaged and there is at least one impressive example of what can be achieved

¹² The Deputy Commissioner is, in effect, the Governor of the District.

through cooperation at this level – a joint effort to destroy a large area of illegal fishponds in the Sonadia ECA that have since been subject to mangrove rehabilitation by the project.

Two **ECA Management Officers** (ECAMO) have been allocated project oversight roles by DOE. One is at the project site office in Cox’s Bazar. The second is located at Sylhet, about 1½ hours’ drive from the Hakaluki Haor project office at Kulaura. The Prodoc envisaged that the ECAMO would “*represent a local enforcement presence on the part of DOE*” and that the project units they administer would ultimately become part of DOE’s district-level offices. DOE has provided these officers, and two support staff to each site office as part of its co-financing contribution. These officers have a huge task in ensuring all the ECA committees established remain effective. There are two District ECA committees, ten at Upazila level, and twenty at Union level – while field staff are preoccupied with no fewer than 72 VCGs that still need support to bring them to a self-sustaining level of understanding, commitment and management skills.

GEF-funded **National Experts** provide technical support as out-posted members of the PMU. The expectation is that their skills, knowledge and experience will be transferred with them to DOE positions at project completion. A DOE staffing application to this effect awaits Ministry of Finance approval.

Project teams are strengthened by the presence of four **United Nations Volunteers** (UNVs). One is a national volunteer (communications). The others are International UNVs: a marine ecologist (Egypt), a wetland ecologist (Ukraine) and a biodiversity knowledge management specialist (Philippines). Their experience closely matches project needs and their contribution is even more meaningful in the absence of links with universities and research organisations. Yet there is also a global presence and perspective that their presence brings to the project which encourages receptive Bangladeshi project staff and extends their understanding and experience. The mission sees the international UNV contribution, including that of the two Australians who made an earlier contribution through draft conservation management plans, as valuable. However it also offers a caution: that the tasks that IUNVs are asked to undertake must always be matched to their experience and be consistent with their contracts.

At the community level **Village Conservation Groups** (VCGs) have been organized to facilitate sustainable conservation and management of biodiversity in the project sites through participatory, stakeholder and community based approaches. Some of these VCGs are groups that were organized and trained under the Coastal Fishing Communities Project supported by UNDP/FAO. Some have not previously been organized. The MTE mission met with a sample of six of these VCGs.¹³

Recommendation 9: The effectiveness of District and lower level ECA committees to be improved in two ways: 1) the head Ministries of the non-DOE professional staff engaged in these committees to provide, or renew, formal directives for their participation; and 2) DOE to

¹³ This cannot be described as a random sample and nor was the Mission able to determine whether it was representative of the range of VCGs.

ensure that its ECAMOs maintain close communication with members of those committees and ensure they are aware of all meetings, and are briefed as to their purpose.¹⁴

Recommendation 10: Uncertainties regarding project management lines of responsibility should be addressed as a matter of priority.

Engagement of NGOs

The sub-contracted NGOs have drawn on a community mobilisation experience in which some have been engaged since 1990. Though they have contributed to this project since 2005, for the whole of 2006 they were not able to work because of delays in contract extension, and this at a time when ECAMU officers are reported to have had no funds for field work. The NGOs eventually recommenced their project work in January 2007 by drawing on their own resources and were not able to access the funds for which they had contracted until May. Despite these frustrations good reports have been produced.

There is an important question regarding the role that the NGOs play in this project and that is “are PMU and ECAMU staff drawing on the NGO demonstration of community engagement and empowerment and building up their understanding and capacity in this area? Is that experience being absorbed?” The evaluators are not in a position to assess this though they regard the answer to this question as critical to project sustainability.

Here, too, it is clear that is that the value of information being obtained through the NGO engagement is diminished by the absence of a project system to systematically absorb and manage that information.

Recommendation 11: While there is nothing to suggest problems with the sub-contracting approach to community engagement, it is appropriate that experience to date be systematically assessed and this should include an examination of the extent to which DOE capacity is being developed in the areas in which NGOs are engaged.

Knowledge acquisition and management

The key project issues of organisation of information in database form and monitoring of all types are closely interrelated and of vital importance. In the absence of a system for gathering information, recording it and accessing it, different data formats and types have emerged and considerable good data that has been collected is not readily accessible as it is spread through numerous reports.

The evaluators expected to be able to view a project database and have it explained. In the absence of a response to their request to view the anticipated PC-based database they remain unsure about what may have been achieved in this area. A specialist tasked with establishing a database was appointed more than four years ago. Since his termination it appears little has been done to advance this important task. Nevertheless, since a “success indicator”

¹⁴ To explanation the basis for this recommendation; the mission heard from a District Forestry official that he had once been reprimanded by his superior in Dhaka for not having attended a meeting of which he had not been informed.

described as “database systems are used” was included in the 2007 annual work plan this implied that a database exists. The evaluators remain puzzled.

Though some data, notably in the case of migratory birds, is beginning to reveal trends there is still no overall project system as a basis for identifying what data to obtain, how and when. Nor are data gatherers provided with advice regarding methodology and frequency of measurement, or standard formats for data collection. Because of this, not only is some critical data not being collected but such data as is obtained is of variable quality and format.

Knowledge acquisition and management is clearly an area in which project staff could benefit from guidance. No project of this nature and complexity can produce good results drawing solely on its own expertise. The key to progress is to engage others outside the project who have specialist skills that complement those that project staff embrace.

This need not be costly as it can often be achieved through networking exchanges with research organisations and universities. Such networking was anticipated by the Prodoc and, further, it was recognised through a recommendation in the project’s 2006 annual report (page 9).

Recommendation 12: Prompt action should be taken to establish a suitable project database. This might best be done by contracting a specialist from outside the project, with payment based on results achieved.

Recommendation 13: Seek further guidance to determine which of all the biodiversity factors are best to measure, how, and when, as a basis for establishing meaningful benchmarks against which change resulting from project interventions can be assessed.

Recommendation 14: Make more effort to elicit and document local knowledge of biodiversity and its management, arrange for local knowledge experts to assist communities which have lost such knowledge and make provision for all this in conservation management plans.

Technical support

Contrary to Prodoc expectations and good project practice no substantial linkages have been established with local universities, or with the scientific and technical professionals of research agencies. The linkages with NGOs, too, are yet to be fully proven, though there are relationships with some groups engaged in wildlife surveys in project ECAs. The Project relies heavily on the collective expertise of its own staff. Yet every project needs some form of technical backup. UNDP CO is not in a position to provide this and nor is the overworked UNDP RTA. GEF funding is contingent on establishing and utilising linkages to individuals and organisations that can bring synergy to a project, and so improve chances of success with project objectives.

Recommendation 15: A technical advisory grouping of individuals from universities and/or other research organisations should be established so the project can gain access to advice, skills, ideas and knowledge that extend that available through its own staff. A networking

approach where individuals so engaged are provided with research and teaching opportunities in return for their contributions should be considered.

Cross cutting issues

Poverty reduction: From inspection of sample field sites and discussions with VCG members the evaluators believe that there are indications that poverty is being alleviated but that success in this area is yet to be sustained. The project as designed stands to make a significant contribution in the ECAs and, provided the ECA management model can be successfully proven there is considerable potential for extension of its poverty reduction features to other parts of Bangladesh.

Food security: It is possible that some gains in food security at project sites could be attributable to the project but real and lasting gains depend on project success in securing access rights for ECA resource user communities through land and fishing leases. Efforts to achieve this are being promoted by the project through the DOE but Lands Department approval is still awaited.

Governance: There has been some success in project facilitation of the participation of local communities in natural resource management and decision making processes. The project is designed to address gaps between centralized decision making and community based planning, but progress in this area is uncertain.

Gender equity: This has been considered in project implementation, apparently with some modest advances as, for example, in the fact that 32% of VCG members are female. There are instances of empowerment of women members of VCGs through their engagement in income generating activities funded through credit advanced by the project. Social conservatism of the communities engaged in the project, especially in the Hakaluki Haor ECA, has frustrated further gains in this important aspect of project implementation.

As designed, the project strategy for **mainstreaming** the conservation and sustainable use of marine and coastal ecosystems is sound. Though there are promising signs of inter-agency engagement at District and lower levels of government, genuine mainstreaming is dependent on the effective functioning of the critically important policy-level National ECA Management Committee. This is yet to be demonstrated.

Transparency: In the interests of fairness, equity, honesty – and learning – transparency should be a consistent theme of project implementation. One area where this is important is in the allocation of loans through the MCG. Transparency means all community members having access to information on who receives support, to what level, and details of repayments. The mission's examination of some VCG registers indicates there has been some action in this respect. Project staff should list for attention other areas where transparency should be an objective and report on where and how this is achieved.

These cross-cutting issues, though not specifically addressed in the Prodoc, are of major importance for project success and for the effort to demonstrate that the ECA management model can make a truly meaningful contribution to progress in Bangladesh.

Recommendation 16: Project staff should remain mindful of cross-cutting issues of poverty reduction, food security, governance, gender equity, mainstreaming and transparency and refer to them where recording and measuring progress.

Other matters

Delays in implementation, and recognition that the project has not achieved as much as expected at this point, have led to a request to the evaluators to consider recommending an extension of time for the project. There is logic in this idea, and it is not simply that there are sufficient funds unexpended (some 38% of the total budgeted) for a modest extension. However, an extension would be useful and productive only if the weaknesses identified in this report were to be addressed and rectified. The duration of an extension should be calculated on the basis of the time and resources needed for implementation, as estimated in the course of the recommended project review.

Project management and UNDP CO also asked the mission to consider an increase in the level of the MCG.

Recommendation 17: Provided there is a meaningful response to this report's recommendation for a review and reorientation of the project a project extension is supported and, also, an increase in the MCG subject to a review of current arrangements for, and demand for, this facility.

Review for project improvement

As is the case with many projects, circumstances change with time and this can mean that the achievement of project objectives set years earlier becomes more difficult. The MTE has established that some elements of the CWBMP project have developed well, some others have not. Time for completion is short and if the much anticipated model for ECA management is to be achieved then a thorough review, as in **Recommendation 1**, above, is needed to clearly define where weaknesses lie and what can be done to address these.

A review cannot be done entirely 'in house'. A fresh look at the situation is needed and new ideas introduced. This means that those closely engaged in the project need to work with 'outsiders' in an environment that is conducive to good thinking. And it cannot be done simply through a series of formal meetings. Various formats are needed, and intense 'brainstorming' sessions are one form that is recommended. Drawing out the best from group members needs individuals with facilitation skills; not just an ability to chair a meeting. The aim is to draw out ideas that project staff have held but, since these were not consistent with the way things were done in the past, were not revealed. These ideas need to be linked with the observations and fresh ideas that appropriately experienced 'outsiders' can introduce.

Such 'outsiders' could include individuals from universities and other research organisations whose contributions to the review might be a test of their suitability for longer term project support as presented in **Recommendation 15**, above.

At the outset of the series of review activities to be undertaken it will be important to conduct a session on project concepts and terminology to ensure everybody has the same understanding. The MTE found varied understanding among project staff of ‘monitoring’, ‘evaluation’, ‘indicators’, ‘database’ and ‘conservation management plan’.

Some of the topics to be explored are complex and require some preparation of material before discussions begin. For instance, before engaging in intensive debate about the project’s conservation management planning process and its products it will be necessary to compile all the information at hand and to summarise this in a single, integrated document, with a clear listing of strengths and uncertainties and pointers as to where discussion should be focused.

The structure and organisation of a review is not for the MTE team to stipulate. This will be best done by key project stakeholders under the oversight of the PSC. It suffices for the MTE team to suggest that a small core group be convened to plan and steer the review and that each of the major subject/issue areas to be addressed be dealt with by a grouping with a membership relevant to that subject/issue.

Each of these groups will need to provide some estimate of time and resources needed to implement the measures they recommend. Even while assuming a project extension will be approved, the limited time and resources available up to project completion could mean that some activities need to be reduced or even eliminated. The overarching goal of the project is to demonstrate an effective working model of ECA management. Hard decisions about which ECAs can be brought to success in time, and to what level of “completeness” may be needed in order to achieve that goal.

Lessons from the project

Technical support is an essential element of every project

Experience shows that every project needs some external technical support. It is very likely that difficulties faced by this project would have been fewer, and more readily dealt with, had more effort been made to network and exchange information, ideas and skills with other organisations. Prodoc text specified that this was needed. For projects yet to be designed, it may be better to make specific provision for this as an Activity, rather than simply embed it in general text.

Inter-agency engagement is always difficult to achieve

A project arrangement for inter-agency engagement that involves the number and diversity of stakeholders that characterise this type of project is always difficult to achieve. The usual mode of interaction attempted is the physical meeting, where individual representatives come together at one place at the same time. For busy senior management the time costs of participating are often judged to be too great, so a project proceeds without meaningful inter-agency engagement.

More innovative means to promote interaction are needed. The use of modern telecommunications for electronic networking (both text and video) for regular dissemination of information and updates is one approach. Conference calls might be adequate to deal with some business. Sub-group meetings whose findings feed into full meetings of the PSC or other committees could be easier to organise (for example; an environment, forestry, fisheries, and agriculture sub-group; with other sub-groups meeting separately but informed of the deliberations of their peer sub-groups). An approach that fosters inter-agency understanding through training courses in which personnel of different agencies learn together might be considered to be beneficial only in the long-term (though for middle level professionals this could bring immediate project benefits.)

Whatever means are chosen for the circumstances it is not adequate for project designers simply to sign off with an assumption that if a PSC or other form of inter-agency arrangement is written in to a Prodoc it will work. Specific arrangements suited to each project need to be considered as part of project formulation.