



Report Number : ICRR0020871

1. Project Data

Project ID
P121210

Project Name
REG: Wildlife Protection: BD and NP

Country
South Asia

Practice Area(Lead)
Environment & Natural Resources

L/C/TF Number(s)
IDA-49090,IDA-H6660

Closing Date (Original)
31-Dec-2016

Total Project Cost (USD)
39,000,000.00

Bank Approval Date
07-Apr-2011

Closing Date (Actual)
31-Dec-2016

	IBRD/IDA (USD)	Grants (USD)
Original Commitment	39,000,000.00	0.00
Revised Commitment	38,980,687.99	0.00
Actual	32,125,219.25	0.00

Prepared by
Ridley Nelson

Reviewed by
J. W. van Holst
Pellekaan

ICR Review Coordinator
Christopher David Nelson

Group
IEGSD (Unit 4)

2. Project Objectives and Components

a. Objectives

As an Adjustable Program Loan, the long-term vision of the regional program (PAD p. 9) was: “to stabilize and, if possible, increase the population and habitats of critically endangered animals in Asia. Since wildlife and habitats cross administrative boundaries and because knowledge and capacity vary widely across and within countries, a regional approach is needed to address cross-border issues, build synergies, share skills, knowledge and experiences and build regional collaboration for the conservation of critical habitats and ecosystems.”



The Project Development Objective (PDO) stated in the Financing Agreements (FAs) was: "to assist the Recipient in building and/or enhancing shared capacity, institutions, knowledge, and incentives to tackle illegal wildlife trade and other selected regional conservation threats to habitats in border areas". The objectives language in the Project Appraisal Document (PAD) deviated marginally but not substantively. This review will use the PDO in the FAs in order to assess the achievements of this project.

b. Were the project objectives/key associated outcome targets revised during implementation?

No

c. Will a split evaluation be undertaken?

No

d. Components

Component 1: Capacity Building for Addressing the Illegal Transboundary Wildlife Trade. (Appraisal Costs US\$9.2 million with US\$8.3 million for Bangladesh and US\$0.9 million for Nepal; Actual Costs US\$11.7 million with US\$10.7 million for Bangladesh and US\$1.0 million for Nepal)

This component included institutional strengthening in wildlife conservation and illegal wildlife trade including technical assistance, support for establishing Bangladesh's Wildlife Crime Control Unit (WCCU) and Nepal's Wildlife Crime Control Bureau (WCCB); the development of analytical and operational protocols to meet Convention on International Trade in Endangered Species (CITES) requirements; support and training for rapid response cells to control illegal wildlife trade; review and revision of Nepal's legislative framework including institutional strengthening; and, support for establishing a Secretariat for Nepal's National Tiger Conservation Committee; and, staff capacity building and training for staff of the implementing agencies to help them manage Protected Areas and reserves in both countries.

Component 2: Promoting Wildlife Conservation in Asia. (Appraisal Costs US\$25.1 million with US\$23.5 million for Bangladesh and US\$1.6 million for Nepal; Actual Costs US\$14.72 million with US\$13.0 million for Bangladesh and US\$1.72 million for Nepal)

This component included the establishment of, and technical assistance for, a Virtual Regional Center of Excellence (VRCE) for wildlife conservation to fill information gaps including establishing a network of scientists and also to address regional conservation and landscape issues to be agreed between participating countries. Research by the VRCE was to focus on conservation and species management research, including upgrading library facilities. However, the largest part of this component, about US\$23 million, was to establish and operate two competitive funding Windows for conservation and management of protected areas including innovative pilot projects. *Window 1* was to support rehabilitation and development of water resources, control invasive species, rehabilitate roads, improve park infrastructure, species monitoring and recovery programs, implementation of monitoring systems, development of imaging platforms, and strengthening enforcement of laws. *Window 2* was to support innovative research projects to benefit species management, to establish pilot programs in conservation, to piloting human/wildlife coexistence models and incentives schemes including payment for environmental services, and to develop and implement ecotourism plans.



Window 1 was not planned to be implemented in Nepal where the government was providing funding for the same purposes to be implemented separately outside the project.

The selection protocol for both Windows utilized a competitive, demand driven approach rewarding innovation and efficiency by managers. A review process was not established during appraisal and was to be developed during implementation.

The project was to partner with NGOs and local communities. The submission of Window 2 funds was to be led by conservation agencies but was open to access for NGOs who would be indirectly partnering with conservation agencies.

Component 3: Project Coordination and Communication (Appraisal Cost US\$4.8 million with US\$4.6 million for Bangladesh and US\$0.2 million for Nepal; Actual Cost US\$5.70 million with US\$5.50 million for Bangladesh and US\$0.20 million for Nepal)

This component was to provide services, technical assistance, and incremental costs for project staff, also operating costs for management and coordination. It included a multipronged approach to communications with communications units to implement coordinated strategies for both regional and national communication purposes. It also covered consultations between participants, mass communication tools, instructive dramas in local languages, and websites. These activities were to be harmonized with the Global Tiger Initiative (GTI). A subcomponent of about US\$3 million was the Government of Bangladesh's commitment to cover salaries and overheads of existing staff and the cost of land purchases and development to build wildlife recovery and rehabilitation centers.

e. Comments on Project Cost, Financing, Borrower Contribution, and Dates

Project Cost: The Project Appraisal Document estimated the original project cost at US\$42 million – US\$39 million for Bangladesh and US\$3 million for Nepal. Total actual costs at closing were US\$32.12 million – US\$29.20 million for Bangladesh and US\$2.92 million for Nepal. The reduction was partly due to the cancellation of the Virtual Regional Center for Excellence (VRCE) but there were also some exchange-rate effects.

Financing: IDA financing at appraisal was to be US\$39 million – US\$36.00 million for Bangladesh and US\$3 million for Nepal. Actual financing at closing was US\$32.12 million.

Borrower Contribution: Bangladesh, with by far the largest project share, was to fund US\$3 million. By project closing the actual was US\$2.50 million. Nepal's planned and actual funding were zero.

Dates: The project was approved on April 7, 2011, became effective quickly on June 29, 2011 and closed on schedule on December 31, 2016.

Restructuring: There were two restructurings, the first on February 27, 2014 to add two procurement methods to the legal agreement for Nepal, the second on December 17, 2015 to reflect India's decision not to participate in the APL program. There was also adjustment of fund allocations mainly related to the dropping of the VRCE component.

The PDO remained unchanged during the project. However, at the Level 2 restructuring in 2015, some intermediate outcome indicators and targets were revised or dropped and new ones added. These changes did not change the level of ambition sufficiently to justify using a split rating.



3. Relevance of Objectives & Design

a. Relevance of Objectives

The project was rated by the ICR as highly relevant to the two participating country's objectives at the time of design and at project closing. The objectives specification that stated, "... incentives to tackle wildlife trade .." was a weak element of drafting, the word "tackle" is imprecise.

In the case of Bangladesh, the ICR argues that it was consistent with the Country Partnership Framework (CPF) FY 2016-2020. However, the ICR does not specify which elements of the strategy are supported by the project. While the activities in the framework include climate change response and environment, together or jointly, as one of the three generic focus areas, that focus area referred mainly to dealing with the agricultural issues of low lying areas under threat from rising sea levels. There is no discussion of wildlife product trade in the CPF although some elements of the strategy might, at a stretch, be inferred to support wildlife indirectly. For this reason, IEG does not find high relevance in the confluence between the project objectives and the strategy at the date of project closing.

Similarly, in the case of Nepal, the ICR argues that the project was consistent with the Country Partnership Strategy FY 2014-2018. However, the CPS does not have any direct focus on this area of activity, the nearest it approaches is a mention of climate change issues. Moreover, the Nepal strategy clearly stresses selectivity and Bank comparative advantage which suggests that the aim was explicitly to not broaden support beyond the three stated focus areas. So, in terms of strategy, the project was something of an add-on at a later date.

Looking at global objectives, the project was clearly relevant to the former MDG Goal 7 which sought to reduce the loss of biodiversity and recognizes the link between natural resource depletion and poverty. The project was also relevant to the Convention on Biological Biodiversity 1992, the Convention on International Trade in Endangered species 1981, the Convention on Wetlands 1971, and the St. Petersburg Declaration on Tiger Conservation (GTRP) 2010.

Given the above findings, there is insufficient case for rating relevance of objectives higher than Substantial.

Rating

Substantial

b. Relevance of Design

The project was hastily prepared. The ICR argues that the logical chain between components, their inputs, activities and outputs linking on to intermediate outcome targets was not clearly designed and articulated. There were issues with the results framework, particularly in that the indicators did not measure well the planned changes in coordination outcomes or changes in illegal wildlife trade. Arguably, such indicators would have been premature at an outcome level but better focused indicators at the intermediate outcome level should have been possible and could have offered more progress evidence on the path towards the stated objectives and longer-term vision.

The ICR states that, given that this was the first regional project aimed at coordination of wildlife activities, the



choice of a horizontal APL instrument, allowing countries to join as and when they were ready, was a novel design feature. While there is some truth in this, the fact that the project ended up with only two participants, and one, Bangladesh, receiving over 90% of the project funding, suggests that there were also disadvantages in starting off with such an open arrangement. It had been intended at the concept stage that India would have been a participant. This would have represented an important block of territory with wildlife populations and arguably would have expanded the opportunity for coordination. However, not being a part of the project in terms of funding did not prevent coordination with India. India was an important participant in a number of activities and contributed significant knowledge on issues such as counting tiger populations.

The project design shows a generally sound balance between institutional capacity strengthening at the higher levels and complementary activities benefiting local populations at the lower levels. The competitive approach to the selection of subprojects was appropriate and, for these purposes, innovative.

Rating
Substantial

4. Achievement of Objectives (Efficacy)

Objective 1

Objective

To assist the Recipient in building and/or enhancing shared capacity, institutions, knowledge, and incentives to tackle illegal wildlife trade and other selected regional conservation threats to habitats in border areas. (While these objective elements are sufficiently complementary to be rated as a single objective, the three elements of capacity/institutions, knowledge, and incentives to tackle wildlife trade are separated below mainly for ease of reference.)

Rationale

A. Building shared *capacity and institutions* to tackle illegal wildlife trade and other selected regional conservation threats to habitats in border areas.

Most of the focus and funding under the project was for this capacity building and strengthening institutions. The objectives were set at an Intermediate Outcome level, in this case an appropriate level for platform building. The main achievements in this area were:

(a) The establishment of the South Asia Wildlife Enforcement Network (SAWEN). The aim was the tracking and monitoring of illegal wildlife trade through harmonization and standardization of laws and policies of member countries (Afghanistan, Bangladesh, Nepal, Pakistan, India, Bhutan, Maldives) documenting poaching trends, wildlife trade, and threats to natural biodiversity within and across countries; strengthening institutional responses through partnerships; research and information sharing; capacity building through training and technical support; and encouraging National Action Plans for combating wildlife crime. SAWEN is fully operational as is evident from their website. However, the formation of SAWEN is not wholly attributable to the project, although the Bank played a significant early role. The first initiatives to form



it began in 2004. The ICR (p.iii) claims a 300% achievement of the target for the establishment of this regional mechanism because the target was revised to be measured by the achievement of one annual meeting held whereas by project closing SAWEN had held three, a somewhat questionable interpretation of the level of this achievement. Notwithstanding the question of project attribution, the significant support provided to the formation of this coordinating body is clearly an important institutional and capacity building achievement by both the Bank and the project.

(b) Other institutions and institutional strengthening.

- A target indicator was to have established three wildlife crime control institutions in the originally three participating countries i.e. including India. However, although India did not, in the end and at the last minute, participate in the project, Bhutan(which started later, see separate ICRR), Nepal and Bangladesh each formed wildlife crime control institutions. The ICR claims (p.v) that, in the absence of the project financing, this achievement would have taken another decade. This is plausible.
- There was a target for Bangladesh to achieve the approval of a new Wildlife Conservation Act. This was approved by parliament in July 2012 and subsequently 21 new rules were adopted. While it is not entirely clear what degree of attribution to the project this new Act had, it helped to enable the newly created Wildlife Crime Control Unit (WCCU) to pursue illegal trade. A wildlife crime database system was established to strengthen and operationalize the WCCU. This data was shared with other SAWEN countries and, through SAWEN, other agencies.
- In Bangladesh, the project supported new staff and training which was a largely sustainable activity because 107 staff appointed during the period of the project have been added to the Wildlife Circle staff and have been trained. In addition, Forest Department staff in Bangladesh were trained in wildlife crime detection, prosecution, habitat development, wildlife conservation, wildlife forensics, and software training.
- The ICR (p.16) reports that intensified poaching and patrolling activities contributed to 28 consecutive months of zero poaching. However, it is not indicated what the level of poaching was prior to that, nor which countries this refers to.
- The ICR (p.16) states that the 18 pilot initiatives implemented in Bangladesh and Nepal benefited conservation and protection of wild elephant, tiger, snow leopard, rhinoceros, white-rumped vulture, langur, and spoon-billed sandpiper. The ICR also reports improved transboundary human/wildlife conflict management, but the evidence for this is unclear.
- Two wildlife rescue centers were established in Taba and Southern Gelephu in Bhutan, however Bhutan was financed in parallel but separately and is reported under a separate ICR.
- In Bangladesh, there was a revised target of 10 training modules to be developed, actual achievement was 11. Also, against a target of 1,000 Bangladesh Forest Department staff trained in wildlife crime and conservation, a higher actual of 1,672 were achieved.
- In Bangladesh, there was a target of six species conservation pilot plans to be developed to improve wildlife management. This was exceeded with nine plans including: (i) a Human-Langur Conflict Mitigation Protocol; (ii) an Elephant Conservation Action Plan; (iii) a Vulture Conservation Action Plan; (iv) a Saltwater Crocodile Management Conservation Action Plan; (v) a habitat management plan for the spoon-billed sandpiper; (vi) a Gharial (a fish-eating crocodile) Conservation Action Plan; (vii) a Tiger Action Plan 2018 to 2027; and, (viii) a Bangladesh Wildlife Master Plan. In addition, 13 out of a targeted 10 national parks in Bangladesh developed ecotourism plans. These are substantial and wide-ranging achievements.



- In Bangladesh, a large area of over 4 million hectares was designated for vulture habitat protection mainly related to the creation of toxic drug free zones, monitoring populations, identification of breeding sites, and digital maps of safe zones.
- Protected Area (PA) management was evaluated using the widely applied Management Effectiveness Tracking Tool for Protected Areas.
- In Nepal, a review to identify implementation challenges concluded that weak implementation rather than policy shortcomings per se was the main problem.
- In Nepal, the Central Wildlife Crime Control Bureau, mentioned earlier, was created, also 16 field level sub offices in 18 districts. Capacity building for the National Forensic Science laboratory and training for law enforcement agencies was supported. It is not clear what outcomes this led to. One of the activities supported was a judicial dialogue on wildlife crime with judges in the Kathmandu Valley with 83 participants.
- In Nepal, there was intended to be completion of legislation for effective compliance with CITES (the Convention on International Trade in Endangered Species) however legislation was drafted but had not received parliamentary approval at the time of project closing.
- In Nepal, 320 staff were trained in wildlife conservation against a target of 180.
- In Nepal, 11 pilot projects were implemented against a target of nine.
- In Nepal, an elephant ranging model was developed to support elephant conservation with the aim of reducing conflict with humans. This was particularly valuable for Bardiya National Park. The ICR reports that this work developed a replicable model for the alleviation of human elephant conflict in other locations so it had wider benefits.
- In Nepal, 372,000 hectares were brought under enhanced biodiversity protection, an achievement that somewhat exceeded the target of 325,400 hectare.
- Covering Bangladesh, Nepal, Bhutan, and India, three coordination meetings were held during the project for the purposes of coordinating transboundary activities and sharing data. There was also broader international coordination on tiger conservation.

B. Building *knowledge* to tackle illegal wildlife trade and other selected regional conservation threats to habitats in border areas.

- Since pilot projects are intended as learning mechanisms, the project's pilot project initiative is treated here as an element in the knowledge building part of the objective. One of the targets of the pilots was to implement three transboundary wildlife initiatives. The actual achievement was 21 including Bangladesh 11, Nepal 7, and Bhutan 3, exceeding the target by about seven times. (Bhutan pilot projects are included presumably.)
- A target was that 15 knowledge products would be produced and shared. 47 knowledge products were actually achieved so this target was more than met, by about three times. Some of these products involved the integration of monitoring and measurement in tiger and wildlife censuses. However, IEG found that, so far, there are quite limited amounts of knowledge information actually posted on the SAWEN website.
- A key indicator was to measure the number of activities contributing to tiger conservation. The revised



target was to have 5 Tiger conservation activities. (This was treated separately in the results framework because of the flagship nature of the tiger as a species and because it is heavily affected by illegal wildlife trade.) The target was exceeded with 11 activities including 3 in Nepal, 5 in Bangladesh, and 3 in Bhutan. The First Phase Tiger Status Report of Bangladesh, Sunderbans, was published by the Wildlife Institute of India and Bangladesh Forest Department in October 2015. The target population was found, using the photographic identification technique, to be between 83 and 130 individuals.

- On research programs, there was a target of 3 which was succeeded with 5 completed including research on tigers in the Sunderbans and work and dialogue with India on human elephant conflict and mitigation protocols.
- The project indirectly supported the enhancement of a visitor center at the Royal Botanical Park, Lamperi in Bhutan.

C. Building *incentives* to tackle illegal wildlife trade and other selected regional conservation threats to habitats in border areas.

It is not entirely clear from the PAD what was intended to be covered in strengthening incentives. There are several categories of stakeholder where positive or negative incentives would be relevant including: positive incentives for *borrower staff*; positive incentives for *people* in the vicinity of parks to participate in wildlife management including the control of poaching; negative incentives of criminal penalties for *potential poachers*; and positive incentives for *neighboring countries* and their institutions to cooperate with respect to wildlife product trade and migration. The achievements on enhancing incentives has limited coverage in the ICR, although one element covered is that the project supported strengthening the regulatory framework in Bangladesh. This led to a substantial increase in penalties and fines for poaching and illegal wildlife trade.

On balance, given the progress in the coordination capacity that was established and the cooperation achieved between countries themselves and with responsible agencies including INTERPOL, and given the evidence of member commitments to support SAWEN, achievement of objectives is rated Substantial.

Rating
Substantial

5. Efficiency

Ex Ante Efficiency

One of the issues in evaluating the economics of the project both ex-ante and ex post is that, due to the prior lack of cooperation between partners and the weak capacity within partners' countries, there has been insufficient data on poaching activity and arrests and on other measures against wildlife trafficking to serve as



a plausible and comprehensive baseline.

The Project Appraisal Document (PAD) discussed a wide range of benefits qualitatively and explored the PAD theoretical underpinnings, attempting to show the additional economic value of regional cooperation. In discussing the theory (citing Sandler et al 2009 on an evaluation of counterterrorism), it highlighted the conceptual and efficiency problem that defensive measures have both downsides and upsides since they induce those under preventive attack to find targets in other countries or to find softer targets within the same country. It is commendable that the PAD laid this theoretical basis out clearly. However, the PAD also noted that offensive measures can indeed directly attack the root cause. It also noted parallels with the terrorist study quoted suggesting that addressing illegal wildlife trafficking within each country individually ignores country-exogenous benefits that offensive measures within any one country confer on others. This means that sub-optimal investment in combating of the problem – a free rider issue - should be expected. The PAD also pointed out another economic issue, that successful wildlife trafficking defense can be expected to raise the price of the products, increasing the incentive to engage in such illegal activities. For this reason, tackling the problem at the demand as well as the supply end is important. The PAD noted that wildlife trade is associated with multinational criminal systems which have been spreading and growing in recent years. It also notes the benefits of cooperation particularly for the smaller faunal populations that are less likely to survive than larger populations where transboundary connectivity of habitat allows them to regrow in size to the point of becoming less threatened and more resilient. Notwithstanding the PAD articulation of a plausible theoretical base there were limited data to enable any quantitative projection beyond loosely extrapolating from East Asia data a total value of illegal wildlife trade in the region of between US\$2.6 billion in US\$3.0 billion. (ICR Annex 3, para 2).

Ex Post Efficiency

The analysis of economic efficiency in a project of this nature is very difficult. A project predominantly focused on building a coordination mechanism led by an institution that, once established, would support cross-border coordination, member legislation, institutional capacity to address poaching and wildlife trade, and knowledge of members, must be expected to be a slow process. Even if baselines had been good, there was little possibility that the strengthening proposed under this project would become measurable in terms of changes in wildlife trade within the project lifetime. Poaching for wildlife trade and the trade itself is deeply embedded and a moving target, changing form all the time.

The ICR made a valiant attempt at approaching ex post efficiency analysis from several angles.

These included: (i) the PAD approach involving a breakeven form of sensitivity analysis looking at the amount of trade that would have to be prevented as a percentage of the (uncertain) scale of the total illegal trade in South Asia; (ii) a country case study with some data showing the changes in poaching in Nepal. Here there was a widely internationally reported 1,000 days of zero poaching of rhinoceros by January 2017 against an average of 11 a year over the prior six years (reported to IEG by the Bank project team); (iii) a sensitivity analysis testing percentages of reduction in international wildlife trade of between 0.5 % and 5% over 10 and 20 years against the appraisal assumption of a total trade value of US\$1billion. In these break-even analyses, benefits exceeded costs in most scenarios, the lower benefit ones being the most plausible.

Coming at the efficiency analysis from a different angle to attempt triangulation, the ICR attempts to extrapolate from an analysis of tiger reserves in India (Economic Valuation of Tiger Reserves Study, Indian Institute of Forest Management, Bhopal, 2015). This study found a range of values between US\$777 per hectare to US \$2,956 per hectare. The ICR assumes that some proportion of similar values can be expected



from the project toward the end of the project in areas where management was improved. A number of scenarios were used applying these tiger reserve study figures. However, without visitor data and entry fees, it is difficult to assess whether even the lowest 1% assumption of benefit flow increase is representative of Bangladesh or Nepal. Without park level data, the parameters are difficult to even guess at.

Finally, triangulating with a different approach, the ICR compares the cost of similar projects in other countries. However, this analysis is also difficult to interpret because the costs of the few projects used as comparators range from US\$1 million to US\$59 million and because there is no denominator provided that enables the scale of the costs to be related to the scale of the activities. It is therefore again difficult to judge how this project at approximately US\$39 million, compares to these other cases.

The ICR also attempts a comparison of economic analysis case studies from selected projects of a similar nature looking at the rates of return of particular types of activity. Across four GEF-supported projects the range of ERRs/IRRs reported in three out of the four of them (one did not report an IRR/ERR) was very large, from 4% to 60%. However, the highest figure appears to have come from demonstration areas and the methodology of analysis in the cases reporting rate of return figures seem not to be comparable. It is therefore not very informative for this case.

IEG concludes that, in this project, plausible cost benefit analysis yielding defensible rates of return are not possible. However, there are some pieces of the limited evidence that can indicate some level of cost effectiveness. Based on the ICR, on discussion with project staff, and on some additional internet search, IEG finds the following evidence to be the most persuasive : (i) the achieved reduction in poaching reported in Nepal, with 1,000 poaching-free days for rhino does appear to be attributable to the combination of an increased focus by government on the problem, some of which is attributable to the project, the strengthened country capacity (see below), and the support from the SAWEN platform; (ii) The INTERPOL PAWS II campaign with a well-coordinated poaching and illegal wildlife trade push in April and May 2015 which yielded, among other achievements: greater focus on 21 criminal groups under investigation, 9.3 tons of ivory recovered, 37 rhino horn, 879 bird parts, 305 arrests, 201 vehicles confiscated, 26 prosecutions succeeded, and 61 awaiting trial (INTERPOL data). Moreover, INTERPOL's report on this acknowledged the support of SAWEN and the coordination between SAWEN members suggesting some share in attribution; (iii) other achievements that are arguably attributable to this project and have been achieved at reasonable cost include: numerous training activities; flagship species population surveys; the establishment of the Bangladesh Wildlife Crime Control Unit, the Bhutan (see separate ICRR) Forest Protection and Surveillance Unit, and also the Wildlife Crime Control Coordination Committee and Wildlife Crime Control Bureau in Nepal. These are all intermediate outcomes which appear to have already had some impact – for example see the poaching achievement in Nepal under (ii) above. These can be expected to have wider and extended impact in future but only provided they are sustained.

Beyond these intermediate outcome achievements and partly related to them: (iv) the activities of SAWEN have, so far, been predominantly the establishment and management of the organization itself as a coordination platform and the arrangement of a considerable number of coordination meetings. These have not only been the annual meetings of members for overall coordination purposes, but more focussed meetings and trainings including, for example, a 2016 training of Border Security Force professionals, a meeting to coordinate action in support of the conservation of Snow Leopards, including the coordination of population counts and other skills and knowledge enhancing events; (v) SAWEN has been able to bring into the coordination meetings a quite impressive array of participants including representatives from CITES, INTERPOL, UNODC, WB, IUCN, TRAFFIC, WWF, USAID, GTZ and a number of other organizations supporting specific endangered species conservation including tigers, pangolins, birds and turtles.



At this early stage it is difficult to put a value on this type of platform-led project activity and to separate the project attribution from that of other agencies such as INTERPOL and CITES, the latter two extending the reach outside South Asia. However, this review concludes that there has been sufficient achievement, including especially the establishment of the SAWEN platform, the inter-country coordination activities, the support for national legislation, the cooperation between SAWEN members, and the coordination with other international agencies such as INTERPOL, TRAFFIC and CITES, to suggest that a promising longer-term platform is being built and at reasonable cost compared to the high and rising value of lost wildlife and the ecosystems it depends on. Nevertheless, there are risks on the sustainability of these national and international efforts.

On cost effectiveness, the project completed most of its objectives and they were completed on time and within budget.

On balance, therefore, we rate efficiency Substantial although with some reservations with respect to the precise attribution across a number of players.

Efficiency Rating

Substantial

a. If available, enter the Economic Rate of Return (ERR) and/or Financial Rate of Return (FRR) at appraisal and the re-estimated value at evaluation:

	Rate Available?	Point value (%)	*Coverage/Scope (%)
Appraisal		0	0 <input type="checkbox"/> Not Applicable
ICR Estimate		0	0 <input type="checkbox"/> Not Applicable

* Refers to percent of total project cost for which ERR/FRR was calculated.

6. Outcome

Relevance of objectives is rated Substantial but of design Modest. The significant early problems with design were mostly later corrected. Enhancing coordination on wildlife management, particularly illegal trade, was important for the region and consistent with strategies and international agreements. On the achievement of objectives, the counterfactual is likely to have been continued ad hoc coordination in pursuit of specific poaching cases but no overarching platform to build on with international agencies such as CITES and INTERPOL. On balance, achievement of the objective is rated Substantial. Efficiency is difficult to estimate at this early stage of platform development and institution-building but is rated, on balance, Substantial largely on qualitative grounds acknowledging the extent of important coordination action and legislation that built on the earlier progress through the Tiger Initiative.

In summary, this project's achievements have minor shortcomings and its overall outcome is therefore



Satisfactory.

a. Outcome Rating

Satisfactory

7. Rationale for Risk to Development Outcome Rating

The ICR rates risk as Moderate on the grounds that: (i) the conservation practices used are well-established and not technically difficult; (ii) that SAWEN is established as the mechanism for regional collaboration on wildlife trade; (iii) that there are higher-level intergovernmental and national processes established; and, (iv) that financial risks are moderate because transition plans were adopted and the current financing was committed. However, the ICR offers limited information about the sustainability of the key coordination mechanisms and staffing with respect to future operating costs and says little about the sustainability impact of other sources of support such as the Trilateral Transborder Wildlife Interception Project or other interventions supported by other sources of funding. The project team reported that some activities will receive continued support under a follow-on Bangladesh Forestry Project.

There are concerns raised in the beneficiary surveys by stakeholders about financial sustainability. In Bangladesh, respondents expressed concern about the lack of planning for project continuity and sustainability and the unclear future of the Wildlife Center and the future of staffing. There were concerns expressed about sustainability of the wildlife forensics laboratory and conservation activities that needed government support. In Nepal, respondents called for greater and longer-term support for SAWEN and noted that, at the design phase of the project there should have been more attention on how project activities would be incorporated into the government system after project closure.

For these reasons, IEG rates risk High.

a. Risk to Development Outcome Rating

High

8. Assessment of Bank Performance

a. Quality-at-Entry

The project was prepared quickly, taking only nine months from concept review to Board approval. This is very short for a project calling for coordination across countries and for a project with a focus on both supply and demand countries and trading chains in the illegal wildlife trade.

It is reported in the PAD that extended public consultations were held during preparation. Risk mitigation was addressed to some extent but the risks in sustainability of the project achievements clearly remain after project closing. The preparation team was well-staffed with an impressive range of the necessary specialist



skills.

The ICR notes problems that arose from unclear implementation guidelines which were a main cause of the slow startup. This was clearly a penalty paid for the hasty preparation. The ICR also notes that the capacity to handle financing and procurement in the two participating countries was overestimated. This contributed to the delays, particularly in the invitation of proposals, evaluation of bids and their approvals.

As noted under the Relevance of Design section, there were issues with the Results Framework. The indicators did not measure well the planned changes in inter-government coordination or wildlife trade changes.

The institutional mechanisms designed for the project's implementation were generally sound. In each country case there was a project administration mechanism at the national level and two mechanisms for coordination at the regional level - a regional policy steering committee and an operational steering committee.

Quality-at-Entry Rating

Moderately Unsatisfactory

b. Quality of supervision

Substantial supervision effort was applied to address the weaknesses in design and project preparedness. The regular supervision missions had to focus on addressing the procurement and financial management issues that were initially delaying the project. Several training courses were carried out to strengthen procurement capacity.

Based on information in the ICR and the changes made, the Mid-Term Review was thorough and it led to a restructuring to adjust the results framework somewhat with changed indicators and to, appropriately, shift the balance of expenditure across components.

The ICR reports that the Environmental Management Plan was adhered to and monitored regularly with the use of a World Bank safeguards specialist. There is evidence that the two borrowing countries appreciated the World Bank skills and support.

Quality of Supervision Rating

Satisfactory

Overall Bank Performance Rating

Moderately Satisfactory

9. Assessment of Borrower Performance

a. Government Performance

There is limited information in the ICR about the strengths and weaknesses of the two governments performances. The Governments of Bangladesh and Nepal gave high priority to the project with, in each



case, support from a number of government ministries and agencies. Overall, Nepal performed better but with a much smaller program, low in total costs even in terms of relative population size.

In the case of Bangladesh, receiving by far the largest IDA funding – originally US\$36 million, the borrower actually contributed US\$2.50 million, somewhat short of the planned estimate of US\$3.00 million. In the case of Nepal, with a much more modest sized IDA funding of US\$3 million, no borrower commitment was planned or provided.

The ICR rates Bangladesh as achieving moderately satisfactory performance and Nepal fully satisfactory. This is supported by the evidence presented.

It should also be recorded that Nepal has hosted SAWEN, making an important contribution to the fostering of regional coordination.

Government Performance Rating

Moderately Satisfactory

b. Implementing Agency Performance

The implementing agencies were the Bangladesh Forest Department (BFD) in Bangladesh and the Nepal Department of National Parks and Wildlife Conservation in Nepal (DNPWC).

In Bangladesh, the ICR finds that the BFD had weak capacity and skills and was understaffed throughout the years of the project. It was also in a state of flux. Bangladesh had five Project Directors during the project and other key staff were often changed. The BFD had legal issues related to the evaluation of procurement that impacted the implementation of the Wildlife Center. However, it appears that the final Project Director and staff were able to quite ably address the remaining outstanding issues and finally complete the planned activities on time by the planned end of the project.

Nepal's DNPWC is reported to have performed satisfactorily. Key staff stayed in place through the whole project cycle and there were few delays. In Nepal, there was adequate capacity to handle the more modest sums planned for the Nepal activities. The ICR reports that Nepal's better performance was due to proactivity and efficient and effective decision-making.

In terms of compliance with safeguards, the ICR reports (p.24, para 93), "the borrowers ensured that the project remained in full compliance with the World Bank's fiduciary requirements through most of the project implementation period in Bangladesh and all the time in Nepal ... all the audit reports did not bring up major issues."

On balance, performance of the two implementing agencies is rated Satisfactory with weight given to the final catching up by Bangladesh after the weak start on a project design with significant initial design quality weaknesses.

Implementing Agency Performance Rating

Satisfactory

Overall Borrower Performance Rating

Moderately Satisfactory



10. M&E Design, Implementation, & Utilization

a. M&E Design

M&E was poorly designed in the PAD with inadequate indicators that did not sufficiently capture the PDO including lack of or weak indicators that might at least begin to track some changes in wildlife crime. Later, in 2015, the partner countries (including Bhutan for the second APL phase) agreed on indicator changes to improve the indicator base. There was, however, always a handicap that illegal wildlife trade had been poorly tracked prior to the project and the baseline was therefore inevitably uncertain.

b. M&E Implementation

The ICR offers limited evidence on M&E implementation.

As noted, there were weaknesses in the indicators and the quality of data which were addressed in the restructuring. Also there were delays with procurement that related to M&E implementation. The ICR reports monitoring of social impacts, especially in human-wildlife conflict situations but it is not clear what was found other than what is reported in the beneficiary survey (ICR p.41): "of 180 people involved in project preparation and implementation. From those, 32 responded."

c. M&E Utilization

According to the ICR, utilization of M&E data was reported through the regional meetings where national data was collated and compared and implementation issues were addressed. There is some evidence of this in the reports of the meetings on the SAWEN site. M&E was better utilized after the MTR and the restructuring changes. The ICR cites a range of data including knowledge products (although IEG did not find them yet on the SAWEN website knowledge section), communications between members, and law enforcement changes and networks used to inform decision-making at national and regional levels. However, the weaknesses and lack of baselines seem to have yielded limited time series data at this point on wildlife trade although attributable impact so soon on illegal trade is probably an unreasonable expectation so early in the coordination process..

M&E Quality Rating

Substantial

11. Other Issues

a. Safeguards

The project was rated Environmental Category B. It triggered the following safeguards: Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Forests (OP/BP 4.36), Indigenous Peoples (OP/BP 4.10), and Involuntary Resettlement (OP/BO 4.12). The ICR reports full compliance with no pending safeguard issues. An Environment and Social Management Framework, an Indigenous People's



Development Plan, a Resettlement Policy Framework and a Social Impact Assessment were prepared. The Category B rating was mainly because some activities were expected to involve minor civil works in sensitive areas. According to the ICR (p.10-11), the project had "no pending safeguard issues ... by the end of the project" and "full compliance with the environmental safeguard regulations of the borrower and the World Bank policies...". The two governments prepared Environmental Management Plans, held public consultations, and made the information publicly available as required.

Protected Area Management Plans were prepared and went through review and screening by the Bank. At one point, there were some concerns by the Bank team over the Natural Habitats (OP4.04) and Forest OP4.36) about ecotourism at Nijhum Dwip National Park in Bangladesh. A court order related to this was issued to require preparation of an assessment. The issue was resolved to the Bank's satisfaction by the Forest Department.

On resettlement, no land acquisition was required. The ICR (p.11) reports that negative livelihood impacts due to project activities were resolved through consultative processes at community level.

One of the main project activities at grassroots level was the resolution of human-wildlife conflict which called for frequent consultation with local communities and included, in Nepal, community cooperation in crop damage insurance.

b. Fiduciary Compliance

Financial.

There were problems with financial management arrangements in Bangladesh but not in Nepal. In Bangladesh, the problems included: weak financial planning, monitoring and documentation up until February 2016; late introduction of internal controls for payments; a case of misprocurement in March 2015 along with a delay in refunding the misprocured amount; and, poor application of financial management skills at main cost centers. In Nepal, performance was satisfactory partly aided by an operations manual but also attributable to qualified staff and sound planning and reporting.

Procurement.

Borrower teams received procurement training. The Mid-Term Review found problems with procurement capacity in Bangladesh and there was continued moderately satisfactory ratings in supervision reports until close to project closing. In Nepal there were some procurement delays leading to some moderately satisfactory ratings in supervision reports. However, overall, the Nepal PCU performed satisfactorily on procurement.

c. Unintended impacts (Positive or Negative)

The ICR reports that the project resulted in significant collaboration in the region and suggests that it contributed to USAID's interest in putting US\$13 million into the Bengal Tiger Conservation Activity that started in 2014. It also catalyzed other support for wildlife law enforcement and conservation. It is somewhat questionable whether these constitute consequences that were unintended since the collaboration and the effects of it were clearly intended but some aspects may have been unexpected as well as positive.



d. Other

12. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Moderately Satisfactory	Satisfactory	IEG aggregates the Relevance rating up to Substantial since the design weaknesses were addressed during implementation. Without an explicit rationale, the ICR rounded down its split rating due to the original weak design. Despite some design weakness, the three main ratings of relevance, efficacy, and efficiency warrant a Satisfactory rating.
Risk to Development Outcome	Modest	High	SAWEN is the key to sustainability. It is not clear that future SAWEN funding and adequate staffing is sufficiently assured.
Bank Performance	Moderately Satisfactory	Moderately Satisfactory	---
Borrower Performance	Moderately Satisfactory	Moderately Satisfactory	---
Quality of ICR		Substantial	---

Note

When insufficient information is provided by the Bank for IEG to arrive at a clear rating, IEG will downgrade the relevant ratings as warranted beginning July 1, 2006.

The "Reason for Disagreement/Comments" column could cross-reference other sections of the ICR Review, as appropriate.

13. Lessons

There are four lessons, drawn from the ICR with some adjustment.

- A regional approach can be effective in addressing transboundary and shared common issues provided there is strong and sustained commitment by participant governments.** In this case, there was strong regional coordination between Bangladesh, Nepal and another non-participant partner, India, on



strategic issues through regional meetings due to a building commitment to coordination on the illegal wildlife trade issues built on a rising commitment to the earlier Tiger Initiative. These proved quite effective in synchronizing policies, sharing experience, coordinating wildlife law enforcement approaches and adopting new good practices. The challenge remains to sustain it.

2. Regional projects focusing on global public goods are challenging to design and implement. This calls for strong preparation analysis of participant capacities and commitments. In this case, project preparation was rushed. This resulted in a number of implementation delays that later had a significant bearing on project implementation and progress.

3. Projects aiming to pilot new approaches for cooperation on transboundary wildlife issues related to wildlife management and illegal wildlife trade require a carefully designed Results Framework from the outset to measure and document changes in intermediate outcomes including especially institutional cooperation and capacity. In this case, indicators at the intermediate outcome level for measuring the success of regional cooperation were not well thought through at the design stage..

4. In projects aiming, for the first time, to pilot new approaches in cooperation on transboundary wildlife issues related to wildlife management and illegal wildlife trade, it is more important to design a program of comprehensive organizational capacity building than to narrowly address lower level activity-oriented training for short-term skills. In this case, looking at one alternative counterfactual, the project rightly focused on higher level institutional strengthening beyond merely immediate skills training. Skills are not unimportant but, alone, would not have addressed the overarching institutional issues for the longer term.

14. Assessment Recommended?

No

15. Comments on Quality of ICR

The ICR was well-prepared and open about the early design weaknesses. It identified the issues and was informative about the institutional issues.

It made a very strong effort to offer some quantification of economic efficiency including comparators from other projects but, in the end, most of this was of somewhat peripheral relevance to the actual efficiency of this particular project that was attempting a first stage of platform building with limited baseline data on illegal wildlife trade.

The ICR use of a split rating was certainly arguable although IEG concluded, on balance, that it did not merit a split.

Deeper exploration of the impact and effectiveness of SAWEN and of the prospects for sustainability would have been helpful. More reporting of the views of other agencies on the impact of the project on coordination would also have been helpful with respect to both efficacy and efficiency, particularly given the limited data available on changes in wildlife trade.



a. Quality of ICR Rating
Substantial