



Report Number: ICRR0022514

1. Project Data

Project ID

P148238

Project Name

Pacific Reg ICT Regulatory Dev. Project

Country

Pacific Islands

Practice Area(Lead)

Digital Development

L/C/TF Number(s)

IDA-H9820

Closing Date (Original)

31-Jul-2019

Total Project Cost (USD)

1,401,399.72

Bank Approval Date

30-Jul-2014

Closing Date (Actual)

30-Jun-2020

IBRD/IDA (USD)
Grants (USD)

Original Commitment

4,500,000.00

0.00

Revised Commitment

1,774,089.00

0.00

Actual

1,401,399.72

0.00

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2. Project Objectives and Components

a. Objectives

The Project Development Objectives (PDOs) as stated in the Loan Agreement (Schedule 1, page 4) and in the Project Appraisal Document (PAD, page 7) were: **"to strengthen the capacity of Information Communication Technology (ICT) regulatory institutions in the participating countries and enhance regional collaboration and knowledge sharing on ICT regulatory issues."**



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

No

c. Will a split evaluation be undertaken?

No

d. Components

There were three components (PAD, pages 7 - 9).

Component 1. Regional ICT capacity development and knowledge management. The estimated cost at appraisal was US\$2.25 million. The revised estimate was US\$3.50 million. The actual cost was US\$1.25 million. This component planned to finance Technical Assistance (TA) activities aimed at knowledge sharing and cooperation among regional regulators. Activities in this component included: (i) regional dissemination of knowledge products; (ii) development of regulatory best practices; (iii) improving access to sector data; (v) providing a central mechanism for sharing knowledge at the regional level; and (vi) hiring key staff and consultants.

Component 2. Regional advisory services. The estimated cost at appraisal was US\$1.75 million. The revised estimate was US\$0.00 million. This component planned to finance advisory services on demand and training regional regulators. This component was dropped during the May 2018 level 2 restructuring and a new activity on cybersecurity support was added. (reasons discussed in section 2e).

Revised: Cybersecurity support. The revised estimate of this component was US\$0.5 million. The actual cost was US\$0.0 million. This component planned to provide technical and analytical support for cybersecurity in the participating countries, including, *inter alia*, through developing cybersecurity strategies, policies, and incident response capabilities, technical support for establishing computer emergency response teams, regional and international knowledge sharing, and research on cybersecurity issues.

Component 3. Project administration. The estimated cost at appraisal was US\$0.5 million. The actual cost was US\$0.16 million. This component planned to provide project implementation support in the areas of fiduciary management and monitoring and evaluation.

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

Project cost. The estimated cost at appraisal was US\$4.5 million. The revised estimate was US\$1.7 million. The actual project cost was US\$1.4 million.

Project financing. The project was financed by a regional IDA grant of US\$4.5 million. The revised estimate was 1.7 million. The amount disbursed was US\$1.4 million. An undisbursed amount of US\$2.7 million (67.5% of the IDA grant) was cancelled on June 25, 2020.

Borrower contribution. Borrower contribution of US\$0.4 million was estimated at appraisal. There was no borrower contribution during implementation.

Dates. The project was approved on July 30, 2014, became effective on September 12, 2014, and was scheduled to close on July 31, 2019. The project closed about a year behind schedule on June 30, 2020.



Restructurings. There were two Level 2 restructurings during the project lifetime.

The following main changes were made through the **first Level 2 restructuring on May 2018**, following the mid-term review (MTR) on August 2017:

- The component two activity associated with regional advisory services on demand was dropped due to a combination of factors, including challenges associated with identifying two or more regulators with similar needs of regulatory services and issues with counterpart funding. Resources from this component were partly reallocated to financing component one activities of regional knowledge sharing and capacity building, and financing a new activity on cybersecurity that was a shared concern in the region. Following the dropping of the activity associated with regional advisory services, counterpart funding was no longer applicable, and the disbursement table was revised to reflect 100% of Bank financing for the project.
- Procurement capacity was augmented, with the recruitment of a dedicated procurement specialist for the project at the University of the South Pacific (USP). The overall procurement arrangements and project implementation structures however remained unchanged.
- The results framework was modified to reflect the changes in project activities. The intermediate indicator “establishment and Maintenance of Annual Regulatory Lessons Learned Section on Advisory Services Database” associated with the dropped component was dropped.
- The project closing date was extended by a year from July 31, 2019, to July 31, 2020, to allow time for completing the ongoing activities.

The following changes were made through the **second Level 2 restructuring on June 26, 2020**.

- An undisbursed amount of US\$2.74 million of the Bank financing that could not be utilized, was cancelled.
- The closing date for the project was brought forward by a month from July 31, 2020, to June 30, 2020.

3. Relevance of Objectives

Rationale

Reginal context. The opportunities for economic development of the Pacific Islands are constrained by their small size. While low purchasing power, challenges of scale and distance to markets inhibited their businesses' opportunities, geographic isolation hindered knowledge sharing between them. Developing the ICT was seen by the Pacific Island countries as a way for addressing the challenges associated with isolation and reducing the cost of doing business in these countries.

Sector context. The ICT sector of Pacific Island countries are at varying levels of development. While the sector was liberalized in some countries (such as, Fiji, Papua New Guinea, Samoa, Solomon Islands,



Tonga and Vanuatu), the sector in some others (such as, Kiribati, Marshall Islands, Palau, and Tuvalu) was still in its infancy. The regulatory institutions likewise varied in the countries. While some had regulatory institutions for a number of years, the regulatory ability to muster resources from license fees or levies was limited in others. Accessing knowledge and technical support collectively to analyze market data and information, building capacity of regulatory institutions, and building a central facility to support smaller regulators was important at the regional level.

Alignment with the Pacific Islands ICT Regional Strategy. The project was fully aligned with the "Framework for Action on ICT Development in the Pacific", developed in 2010 by the Secretariat of the Pacific Community. While focus number one of the framework identified the need for regional collaboration on ICT issues, focus number two, articulated the need for developing ICT policy and the legislative and regulatory framework, and focus three highlighted the need for ICT human capacity building. The concept of a regional ICT regulatory advisory committee was first raised at a meeting of regional ICT stakeholders in 2007, with the ICT ministers of Pacific Island countries requesting the World Bank, to undertake an options study in 2008 for setting a "Pacific ICT Regulatory Resource Center" (PIRRC) for regional regulation of the sector. Following this, the Bank and the Asian Development Bank (ADB) mobilized resources from the Pacific Region Infrastructure Facility Trust Fund and set the PIRRC. In the absence of a dedicated regional institutional/forum, the University of South Pacific (USP) was assigned a leading role for ICT outreach and ICT development at the regional level. A two-phase implementation was envisioned for PIRRC, with the first phase executed using Bank and ADB executed Trust Fund Resources.

Alignment with Bank Strategy. The PDOs are well-aligned with the Bank's regional strategy for Pacific Islands articulated in the Regional Partnership Framework (RPF) for 2017 - 2021. This framework identified ICT as the key infrastructure for supporting the region's development objectives, and improvements to the ICT regulatory environment as essential for improving ICT access, adoption and affordability. The PDOs were directly aligned with Focus Area Four of the RPF (strengthening the enablers of growth), and objective 4.2 (increased access to basic services and improved connectivity infrastructure). The RPF also highlighted the need for adopting a regional approach to sector development and greater regional integration. The RPF was also fully aligned with the common themes emerging from the current national development strategies of regional countries such as, building climate resilience, investing in human development, improving infrastructure and fostering growth. The importance of connectivity to respond to crisis is also underscored by the ongoing COVID - 19 pandemic. The ICR (paragraph 21) notes that while research on the economic impact of COVID - 19 is still scarce, initial evidence indicated that countries with advanced connectivity can mitigate up to half the negative long-term impact of the pandemic. The PDOs were fully aligned with Pillar Four of the Bank's COVID - 19 Response Approach Paper of June 2020 (strengthening ICT policies, institutions and investments for rebuilding better).

Previous Bank Experience. This Bank-funded project was the second phase, aimed at developing a regional approach to ICT regulatory issues in Pacific Islands. This phase was designed to be part of a wider program, with enhanced scope and sophistication of ICT activities as compared to the first phase. Although the level of ambition of this recipient-executed second phase (as compared to the Bank-executed first phase) was appropriate, following the dropping of the original component, two activities and persistent implementation challenges associated with the constraints of the financing instrument (regional IDA grant), this project turned out to be a mere continuation of the first phase, with little value added. The regional mechanism (the Pacific ICT Regulatory Resource Center) was already established in Phase 1, the types of outputs remained largely the same for the two projects, and the networks



developed between ICT regulators of the region were already in place, prior to preparation and approval of this project. The relevance of objective is rated as **substantial**.

Rating

Substantial

4. Achievement of Objectives (Efficacy)

OBJECTIVE 1

Objective

To strengthen the capacity of ICT regulatory institutions in the participating countries.

Rationale

Theory of change. The causal links between project activities, outputs, and outcomes were logical. Given the limited ICT regulatory capacities in the Pacific Island countries, their varying levels of development, and lack of adequate scale in individual markets to finance sophisticated ICT products, technical assistance activities aimed at regional capacity building and knowledge management, were likely to strengthen the capacities of regulatory institutions in the participating countries. These activities were aimed at the long-term development objective of a regional approach to IT sector regulation in Pacific Islands.

Outputs (ICR, pages 32 - 35).

- Knowledge portal was established when the project closed as targeted. An online website that provided access to an advisory services database was maintained by the Pacific ICT Regulatory Resource Center (PIRRC) as targeted. The ICR (page 33) notes that while the knowledge portal at the PIRRC was established and active at the time of project closing, it is currently not active and unavailable online.
- Eleven working papers on priority regulatory topics (such as, spectrum management, open access and national emergency telecommunication plans) were completed when the project closed. This exceeded the target of five.
- Gender-disaggregated data on ICT market penetration was not maintained as targeted when the project closed. The ICR (page 32) mentions that this indicator was to be revised at first project restructuring, but erroneously was not. An inventory of gender specific existing ICT programs in the region were not developed as targeted at project closure.
- Five training programs with fifteen regulatory staff were trained per program per year when the project closed. This was short of the target of twenty.
- Five regional sharing events were held annually, short of the target of twelve.

Outcomes



- The project activities were expected have a favorable impact on the telecommunications sector of the participating countries. This impact was measured through sector-specific standard indicators developed by the Bank's Sustainable Development Network to measure the impact of technical assistance to the sector. These indicators were expected to show the impact of the project on: (i) making the legal and regulatory framework more effective at delivering sector performance; (ii) improving the capacity of the regulatory institutions to deliver on their mandate; (iii) increasing the level of competition in the ICT sector; (iv) improving the ICT policy environment in the country; and (v) reforming state-owned assets in the ICT sector (PAS page 22). The indicators were measured by composite scores ranging from one (low) to five (high)). The score reached when the project closed was two as compared to the target of four.

In the absence of any evidence of implementation of regulatory or policy actions by participating countries that can be attributed to the outputs produced by the project, aimed at strengthening the capacity of ICT regulatory institutions in the participating countries, efficacy is rated negligible.

Rating
Negligible

OBJECTIVE 2

Objective

To enhance regional collaboration and knowledge sharing on ICT regulatory issues.

Rationale

Theory of change. The causal links between project activities, outputs and outcomes were clear. Given the limited collaboration and knowledge sharing between ICT sector regulators, activities aimed at regional advisory services on cybersecurity issues were aimed at enhancing regional collaboration and knowledge sharing on ICT regulatory issues, and these were expected to contribute to the long-term development objective of regional approach to ICT sector regulation in Pacific countries. The two development indicators may be considered inter-related intermediate outcomes of project activities, synergizing to achieve the development objectives measured by the PDO indicators.

Outputs (ICR, pages 35-36).

It should be noted that no activities were implemented under the original (regional advisory services) and revised (cybersecurity support) component two.

- The set of tools and templates for developing a Pacific model to assist the development of a National Cyber Security Master Plan, were not delivered as targeted.
- No regional cyber security capacity development workshop was held annually when the project closed. This was short of the target of three.

Outcomes



As discussed above, the project activities were expected have a favorable impact on the Information Technology/Information Technology Enabled Services (IT/ ITES) sectors of the participating countries. This impact was measured by composite scores as discussed above. The score reached when the project closed was two as compared to the target of four.

Given that none of the outputs were produced and outcomes not realized, efficacy of the objective of enhancing regional collaboration and knowledge sharing on IT regulatory issues is rated as negligible.

Rating
Negligible

OVERALL EFFICACY

Rationale

In the absence of any evidence of implementation of regulatory or policy actions by participating countries that can be attributed to the outputs produced by the project, overall efficacy is rated as negligible.

Overall Efficacy Rating
Negligible

Primary Reason
Low achievement

5. Efficiency

Economic analysis. There was no economic or financial analysis at appraisal, given that the impact of improving regulatory capacity could not be easily quantified. The potential economic project benefits from improving regulatory capacity was assumed to come from improved service delivery of ICT services at the regional level. This in turn was expected to facilitate private sector participation in the sector and aid in efficient provision of telecommunication services. There was no economic analysis at closure.

This project was far less efficient as compared to the Phase 1 project executed by the Bank/ADB, in terms of the accepted norms of value of money such as, implementation time frame, cost, and outputs produced. While the prior project was implemented in two years, this project had a time frame of six years. Both projects cost US\$1.4 million (although this project had an envelope of US\$4.5 million, over two-thirds (67.5%) of this amount could not be utilized and was cancelled at closure). While the number of technical notes, knowledge products, and knowledge sharing events were the same for both projects, no ad hoc advisory services were recorded under this project, as compared to 31 under the phase 1 project.

Administrative and operational shortcomings. There were significant administrative and operational shortcomings. There were delays in (i) hiring a Project Director (a legal covenant); and (ii) preparation of the Project Operations Manual. Also, the lack of effective coordination between the University of South Pacific (USP) and the Steering Committee contributed to implementation delays. Project progress up to the mid-term review was quite slow, with less than a third of the Bank financing disbursed till then. This was partly due to the



lack of familiarity of the USP with the Bank's procurement processes. The USP further took the decision (since it was responsible for project administration as per the financing agreement) not to renew the contract of the Project Director and scale down the role to that of a Project Manager (ICR para 49). This exacerbated the already tense relationship between the USP and the Steering Committee. At closure, there was no progress on activity associated with cybersecurity, and over two-thirds of Bank financing that could not be utilized were cancelled.

In sum, efficiency is rated as negligible given that the recognized norms of value for money were not met and there were significant administrative and operational shortcomings.

Efficiency Rating

Negligible

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 the PDO is substantial. Overall efficacy was negligible, given that there is no evidence of regulatory or policy actions by the participating countries that can be attributed to the project activities. Efficiency is rated negligible, given that the recognized norms of value for money were not met and there were significant administrative and operational shortcomings. Taking these ratings into account as per the Bank ICR IPF guidance (Appendix H), outcome is rated highly unsatisfactory, reflecting severe shortcomings in the project's achievement of its objectives and in its efficiency.

a. Outcome Rating

Highly Unsatisfactory

7. Risk to Development Outcome

Stakeholder risk. The ICR (paragraph 78) notes that the ICT agenda still remains a priority in the region and that although the Pacific ICT Regional Resource Center (PIRRC) is not currently active and financed, the notion of adopting a regional approach to ICT regulation is still valued by regulators. However, there is a lack



of technical leadership in the region without a regional organization taking a leading role for addressing ICT regulatory issues.

8. Assessment of Bank Performance

a. Quality-at-Entry

This project was prepared on the experience from the phase one of the project and the Bank's experience of similar regional initiatives undertaken in other sectors in Pacific Islands (such as the aviation sector aimed at establishing Pacific Aviation Security Office as a regional provider of additional security to national authorities on aviation safety and security). Lessons incorporated at appraisal included, active involvement of the steering committee and continued presence of the Project Director with financial management expertise during project execution. Several risks were identified at appraisal including, substantial stakeholder risk. Mitigation measures incorporated at design included a stakeholder consultative mechanism at appraisal. With mitigation measures, project risk was rated as moderate at appraisal; it was not adequate, as pointed out by the ICR, since the project involved the same stakeholders as Phase 1, but in different capacities. The ICR (paragraph 67) points to the fact that the risks of coordination and counterpart financing were the main reasons for component 2's activities not being implemented, and these were not identified at appraisal. The arrangements made at appraisal for fiduciary compliance were appropriate (discussed in section 10b). There were weaknesses in M&E design (discussed in section 9a).

In addition to weak risk identification and mitigation measures, there were major shortcomings at Quality-at-Entry:

- The phased implementation approach was to enhance scale and sophistication, but the project turned out to be a mere continuation of phase 1 activities at the regional level, with little value-added.
- A regional IDA Grant used as the lending instrument, excluded certain (non-IDA) Pacific Islands and members of the Pacific ICT Regulatory Resource Center (PIRRC) from being direct beneficiaries of the project on account of not being eligible for IDA financing (although the non-IDA countries were retained as members of the Steering Committee). There were challenges associated with direct exclusion of non-IDA countries from the project (ICR, paragraph 41). According to the clarifications provided subsequently by the team, the implementation challenges stemmed from the constraints of the regional IDA grant that led to the selection of USP as the grant recipient. This effectively created a gap between the financing and project beneficiaries. The team further clarified that this was a critical element that impacted the Project's performance as compared to the more successful first phase of the program.
- In the absence of a sector-focused regional institution in place, the University of South Pacific (USP), was selected to implement the project. The Project design did not consider the lack of incentive for USP to implement the Project on behalf of the beneficiaries represented by the Steering Committee. The USP, a higher education institution, did not have the related technical or



fiduciary capacities for Bank financed operations. The limited oversight from USP contributed to implementation delays.

- The project was not ready for effectiveness, given that of the four legal covenants, only two covenants were complied with, and there were delays in appointment of a Project Director (a legal covenant). Further, at closure this covenant was not complied with due to the non-renewal of the Project Director's contract and implementation challenges leading to the non-recruitment of a Project Director not being recruited for the remainder of the project.

Quality-at-Entry Rating

Moderately Unsatisfactory

b. Quality of supervision

Ten Implementation Status Results Reports (ISRRs) were filed over a project implementation time frame of six years (implying on average twice a year supervision missions as per the norm). Following the mid-term review, the supervision team made the required changes, given that component two activities had changed. The support provided by the team aided in fiduciary compliance (discussed in section 10b).

There were significant shortcomings in supervision:

- Following the first restructuring only one mission was held in 2019, for which no aide memoire was transmitted (ICR, paragraph 73).
- The supervision team did not sufficiently address key issues, such as the lack of engagement by the USP following the first restructuring, the sources of tension between stakeholders, and non-renewal of the contract for the Project Director (a legal covenant). The ICR (paragraph 72) notes that despite multiple attempts to engage with the client including efforts to meet with USP by members of the task teams visiting Fiji on missions for other ongoing engagements, there was lack of responsiveness from the recipient following the first project restructuring in 2018.
- The ICR provides no information on the continuity of leadership during implementation, but notes that there was a change in leadership after the first project restructuring, at a time when greater engagement was needed.

Given the very limited progress after the first project, the Bank could have proactively closed the project earlier. The quality of supervision is rated as moderately unsatisfactory.

Overall, the Bank performance is rated as unsatisfactory, in view of the major shortcomings at quality-at-entry that could not be overcome.

Quality of Supervision Rating

Moderately Unsatisfactory



Overall Bank Performance Rating

Moderately Unsatisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design

The impact of the project was measured through sector-specific standard indicators developed by the Bank's Sustainable Development Network to measure the impact of technical assistance to the sector. The indicators were measured by composite scores ranging from one (low) to five (high)). The USP was in charge of monitoring project performance.

While the indicators were appropriate, given that the project activities aimed at addressing ICT regulatory issues at the regional level, there were no indicators aimed at measuring progress on regional collaboration. That is, demonstrating the benefits of adopting a collaborative approach on ICT regulatory issues. Furthermore, the PDO level indicators lacked adequate detail in terms of methodology and data sources to measure progress.

b. M&E Implementation

The ICR (paragraph 55) notes that the USP's reporting of results was sporadic, with limited supporting evidence. The ICR further reports that the mid-term review noted that USP expressed data collection issues and suggested a revision in the Results Framework. However, the UPS proposal was not shared with the team. There were no adequate supporting materials for demonstrating progress after project restructuring and that there were data entry errors in the Results Framework throughout the implementation period (ICR paragraph 56).

c. M&E Utilization

The ICR (paragraph 59) notes that data collection was limited and there was no evidence of utilization of the M&E data. There was no evidence of any follow-up being conducted on outputs and their downstream impacts. There was no evidence that any participating country used the outputs produced under the aegis of this project to take policy or regulatory action. Likewise, there was no evidence of knowledge sharing at the regional level.

In sum, M&E is rated negligible primarily on account of shortcomings in the M&E implementation and utilization.

M&E Quality Rating

Negligible

10. Other Issues



a. Safeguards

The project was classified as a category C project under the World Bank safeguard policies. No safeguard policies were triggered at appraisal (page 16). No safeguard policies were triggered during implementation.

b. Fiduciary Compliance

Financial management. A financial management assessment of the University of South Pacific (USP) conducted at appraisal, concluded that their financial arrangements were satisfactory. The financial management risk was rated as moderate at appraisal (PAD, paragraph 6.08).

The ICR (paragraph 65) notes that financial management was rated as moderately satisfactory during the implementation period. However, the project did face issues relating to recovering administrative costs incurred by USP, delays in establishing online disbursement processing arrangements and financial reporting issues during implementation. However, there were no major compliance issues or outstanding financial reports when the project closed. The ICR provides no information on the quality of audits.

Procurement. An assessment of the procurement arrangements was conducted at appraisal. The risks identified at appraisal included lack of clarity on who would be accountable for procurement decisions and inadequate procurement staff. Mitigation measures incorporated at design included preparation of a detailed procurement plan at appraisal and clarification of the role of USP as the entity in charge of procurement. With these measures, procurement risk was rated as moderate (PAD, paragraph 6.09).

The ICR notes that there were significant procurement delays during implementation, the quality of procurement documentation was low, and materials were often returned for improvement. The ICR reports no case of mis-procurement.

c. Unintended impacts (Positive or Negative)

d. Other

11. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Unsatisfactory	Highly Unsatisfactory	In line with the Bank ICR IPF guidance, 2020 (Appendix H), with substantial relevance, negligible efficacy and efficiency, the overall outcome rating is HU.



Bank Performance	Moderately Unsatisfactory	Moderately Unsatisfactory
Quality of M&E	Negligible	Negligible
Quality of ICR	---	Substantial

12. Lessons

The ICR draws the following lessons from the experience of implementing this project, which are presented below with some adaptation of language.

1. Technical leadership is critical for regional activities. This project demonstrated the importance of regional championship and ownership of the agenda. A lack of technical leadership on the agenda limits the ability of the institution to coordinate the necessary expertise and inputs to effectively implement projects in that field. While the University of South Pacific was given the mandate for ICT development in this project, it was not aligned with its core function as a tertiary education institution and lacked the necessary technical capacity to execute a Bank-financed project.

2. Multi-stakeholder projects require clearly defined roles and responsibilities for stakeholder coordination. This entails a greater level of engagement, consultation, and stakeholder coordination during project preparation. Documents such as the project operation manual and implementation agreements between participating stakeholders need to be prepared early on and stakeholders sensitized ahead of project effectiveness to reduce stakeholder coordination risk and to avoid potential misunderstandings that may lead to downstream challenges.

3. Procurement capacity building should be complemented with technical assistance, if need be through support firms. While procurement is central to any project's implementation, the experience from this project highlights the criticality of the processes around the execution of procurement itself. This includes many areas that require much more subject matter expertise than procurement process familiarity, such as designing terms of reference, conducting market analysis, carrying out technical evaluation of proposals/bids, and contract management, among others. The lesson from this project is that in technical assistance projects such as those pertaining to ICT, the availability of adequate technical capacity becomes more critical. In this project, the University of South Pacific did not clearly have the capacity to address procurement issues.

4. Developing regional approaches requires long-term engagement. Regional approaches to economic development has advantages, particularly for small-states. The regional IDA Grant was potentially the only Bank financing instrument to continue this long-term engagement. The lesson from this project is that the Bank's existing financial instruments may not be best suited to respond to such needs, particularly in low-capacity regions where long-term engagement require sustained technical assistance, technical and implementation capacity building, and grant financing to continue operations till long-term sustainability options are realized.

13. Assessment Recommended?



No

14. Comments on Quality of ICR

The ICR candidly discusses the issues associated with the regional dimensions of the project, especially when there is no regional forum with a clear mandate. It also discusses candidly the issues associated with the monitoring and evaluation of the project. The ICR draws reasonably good lessons from the experience of implementing this project.

However, there were some shortcomings. With relevance of objective rated high and efficacy and efficiency negligible, the overall outcome is highly unsatisfactory as per the Bank ICR IPF guidance, instead of unsatisfactory as reported in the ICR. The ICR provides no information on the continuity of leadership and the quality of financial audits. The ICR is also excessively long, with the main text at 30 pages (double the recommended length of 15 pages).

a. Quality of ICR Rating Substantial