IEG ICR Review Independent Evaluation Group

Report Number: ICRR13865

1. Project Data:		Date Posted :	12/31/2013	
Country:	Uganda			
Project ID:	P065437		Appraisal	Actual
Project Name:	Protected Areas Management And Sustainable Use Project	Project Costs (US\$M):	38.0	39.9
L/C Number:	C3690	Loan/Credit (US\$M):	27.0	31.9
Sector Board :	Environment	Cofinancing (US\$M):	8.0	8.0
Cofinanciers :	GEF	Board Approval Date :		07/09/2002
		Closing Date:	12/31/2007	06/30/2010
Sector(s):	General agriculture fish (45%); Other social ser	ning and forestry sector (50 vices (5%)	9%); Central governmer	nt administration
Theme(s):		and institutions (33% - P); nagement (17% - S); Rural		
Prepared by :	Reviewed by:	ICR Review Coordinator:	Group:	
Rimma Dankova	Ridley Nelson	Soniya Carvalho	IEGPS1	

2. Project Objectives and Components:

a. Objectives:

This Protected Areas Management and Sustainable Use Project was a follow-on to the Institutional Capacity Building for Protected Areas Management and Sustainable Use Project (1998-2002). The project financing included an IDA credit of US\$27 million and a GEF grant of US\$8 million.

The statement of the project objectives in the Project Appraisal Document (page 4) is:

"The sustainable and cost-effective management of Uganda's wildlife and cultural resources".

The Loan Agreement's (page 20) statement is identical:

'to achieve sustainable and cost-effective management of the Borrower's wildlife and cultural resources through: (a) improving the Borrower's ability to attract tourists to its wildlife and cultural heritage sites; and (b)developing and implementing cost-effective management strategies in managing these resources.

The Global Environment Objective that is cited in the Project Appraisal Document (page 5) is:

"to ensure the effective, long-term conservation of Uganda's biodiversity in the face of competing economic pressures".

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

c. Components:

The project components were:

1. **Sustainable Wildlife Management** (Appraisal estimate US\$30.60 million; Actual cost at closing US\$33.2 million of which GEF 4.10 million Grant).

This was expected to assist Uganda Wildlife Authority (UWA) in implementing the Protected Areas System Plan to rationalize and demarcate the boundaries of the national asset, and support cost-effective management of these assets at the field level through logistical support, equipment and modest targeted civil works for the Parks and Reserves. Specifically, activities targeted were: (a) capacity-building for UWA to implement its Strategic Plan; (b) development and implementation of the Authority's community management program to enhance wildlife management outside the Protected Areas; (c) enhancement of park patrols, park management planning; and monitoring of the Protected Areas; (d) rehabilitation and maintenance of Protected Areas' facilities and infrastructure; and (e) studies on the Protected Areas' resources. In addition, involuntary resettlement could be a consequence of redefining park/reserve boundaries in the Mt. Elgon National Park, Katonga Game Reserve, and Pian Upe Wildlife Reserve. Thus this component included support for a team of consultants to review and design appropriate plans to address the specific issues of people resident in the protected areas, or using the protected area resources. This activity was to be limited to the design of options and did not include implementation of the plans that would be financed separately.

2. **Environmental Conservation Education** (Appraisal estimate US\$ 4.00 million; Actual cost at closing US\$3.44 million of GEF Grant).

The project aimed to establish new programs at the Uganda Wildlife Education Center (UWEC) for visitor education, especially school children. It was expected that UWEC would reach out to school children around Uganda by funding both daytime visits for nearby schools and an overnight residency program for children living more distantly. New exhibits construction and maintenance highlighting Ugandan wildlife would be funded by the project to increase the range of educational messages of interest. Specifically, financing would be provided for (a) an educational campaign; (b) construction of new facilities, including open air exhibits, access roads; accommodation for staff; and a child discovery center; (c) an animal welfare and rehabilitation program; and (d) an institutional strengthening plan of the Center.

- 3. **Tourism Framework** (Appraisal estimate US\$1.70 million; Actual cost at closing US\$1.21 million). This component aimed at providing funding for logistics and equipment that would: (a) establish a sustainable tourism framework based on policy development and enabling legislation; (b) provide for licensing and registration of operators within the sector to ensure quality; (c) develop accurate statistics on the sector; and, (d) facilitate the improvement in human resource training. In addition to funding these activities the project aimed at providing substantial funds for construction of a building for the Ministry of Tourism, Trade and Industry (MTTI). Under this component, support was to be provided for the Wildlife Department in the MTTI. This support was to include training, equipment, management support and technical capacity building to enable the Wildlife Department to carry out Uganda's responsibilities under relevant international treaties, and in particular to function effectively as the Management Authority for the Convention on International Trade in Endangered Species (CITES).
- 4. **Cultural Heritage** (Appraisal estimate US\$0.80 million; Actual cost at closing US\$1.12 million). The component provided moderate operational funds, some equipment and civil works to continue the establishment of Uganda Museums and Monuments Agency. This support was intended to finalize the former Department's transition to a sustainable semi-autonomous agency and facilitate expansion of the offerings at the Museum and the identification and development of remote antiquarian sites of significant importance to Uganda's cultural heritage. Specifically, the project supported institutional strengthening of the Department of Antiquities and Museums (DAM), including: (a) renovation and maintenance of its buildings and museums; (b) establishment of a heritage trail in Fort Portal; (d) construction of a cultural center in Kabale; (e) development of a national cultural historic sites database; (f) development of pilot cultural sites; and (g) training of DAM's staff in visitor management and museum operations.

5. Project Coordination Unit (Appraisal estimate US\$0.80 million; Actual cost at closing US\$1.12 million). This was to support the Project Coordination Unit for two and a half years. It was expected that the Unit would build the capacity of the implementing agencies to take over the responsibility for project management including procurement and reporting.

d. Comments on Project Cost, Financing, Borrower Contribution, and Dates:

Project Cost

At closing, the project total cost was US\$39.90 million, only slightly more than the appraisal forecast (US\$38.00 million). The resettlement activities of the Uganda Wildlife Authority component were cancelled. The funds related to the resettlement sub-component were reallocated to support acquisition of communication and other equipment to support operation and management of the Protected Areas across the country.

Financing

The project financing consisted of IDA credit (estimated cost of US\$27.00 million at appraisal and actual cost of US\$32.02 million) and GEF Grant (appraisal and actual cost of US\$8.00 million). The IDA Credit appreciated in value because the US\$ depreciated against Special Drawing Rights, the currency of the Credit.

Borrower Contribution

The Borrower's contribution at appraisal was expected to be US\$3.00 million; actual contribution was zero. The ICR (page 8) notes that the counterpart contribution was reduced to zero percent across all categories around the time of the Mid-term Review. This adjustment was common to many projects in the World Bank Uganda portfolio and stemmed from the country's general inability to meet counterpart funding requirements for its World Bank project portfolio.

Dates

The project was closed 3.2 years later than the original closing date due to delays caused by:

- (i) a lack of counterpart funding:
- (ii) animal disease outbreaks during project implementation (ebola, anthrax, SARS, Avian Flu);
- (iii) security threats at Murchison Falls National Park.
- (iv) political interference in project implementation; and
- $\langle v \rangle$ a decline in parallel activities by development partners in Uganda that supported protected areas.

The project closing date was extended twice: from December 31, 2007 to June 30, 2010, and then to March 31, 2011.

3. Relevance of Objectives & Design:

a. Relevance of Objectives:

Substantial

• The project responded to national strategic priorities and its development objective was relevant at appraisal and currently. Project objectives were relevant to the Government's strategy to reduce poverty through sustainable economic growth and development, within the framework of protection of environment and natural resources, and the goals of the current National Development Plan for the period of 2011-2015. The latter called for restoring degraded ecosystems, ensuring sustainable management of environmental resources, increasing public awareness, and enforcing environmental laws and regulations. Project objectives were highly relevant also to the government's strategy for the Wildlife and Tourism sector, which emphasizes rehabilitation and management of the wildlife and conservation areas, revitalization of the tourism industry, and empowerment of local governments and communities in sustainable management of natural resources. As part of the strategy, the government's institutional reforms focused on establishing a number of semi-autonomous entities

- responsible for different facets of the conservation and tourism sectors, including the Uganda Wildlife Authority, the Wildlife Education Center, the Uganda Tourist Board, and the Department of Antiquities and Museums.
- Project objectives remained consistent with the objectives of the Bank's 2011-2015 Country
 Assistance Strategy for Uganda that stated that development and growth in the country must occur in
 an environmentally sustainable manner, given that 90% of the population is directly dependent on the
 country's natural resource base.
- Project objectives were also consistent with the Convention on Biological Diversity and the Ramsar Convention on Wetlands ratified by the Government of Uganda. They contribute to the GEF Operational Strategy for Biodiversity, focusing on a range of ecosystems representative of Uganda's biodiversity (savannas, mountains and forests), and are consistent with GEF Operational Programs for Arid and Semi-arid Ecosystems (OP1), Mountain Ecosystems (OP4) and Forest Ecosystems (OP3).

b. Relevance of Design:

Substantial

The composition of project components and activities was relevant to the expected project outcomes of sustainable and cost-effective management of Uganda's wildlife and cultural resources objective. The proposed boundary fixing of protected areas (PAs) aimed at increasing security, reducing poaching and conserving wildlife. Awareness raising was to improve the knowledge of local communities on the value of the reserve areas and prepared them for collaboration in PAs' sustainable management. Support for building the capacity and outreach of the park ranger service was to improve its ability to better manage and increase PA security and reduce poaching, thus making the parks more sustainable. Better run parks would be expected to be more attractive to tourists through a more efficient and better regulated tourism establishment. Increased tourism, allied with the provision of new facilities and buildings, was expected to reduce rental overhead costs and, with more efficient planning and staff deployment, lead to reduced costs and increased revenues. Thus in aggregate, project activities would contribute to the sustainability and cost-effectiveness outcomes. The project design could have included measures to improve governance of the project funds and develop institutional capacity in project management.

4. Achievement of Objectives (Efficacy):

"To achieve sustainable and cost-effective management of Uganda's wildlife and cultural resources"

The statement of project objectives has two sub-objectives: (a) to achieve sustainable management of Uganda's wildlife and cultural resources, and (b) to achieve cost-effective management of Uganda's wildlife and cultural resources.

(a) **To achieve sustainable management of Uganda's wildlife and cultural resources:** Rated Substantial

Outputs

- In pursuit of the development objective, the project financed the development of protected areas (PA) infrastructure. Its deterioration threatened wildlife and ecosystems of the national parks and PA-based tourism. 160 new housing structures were made available to approximately 50 percent of staff working in PAs. Office infrastructure was rehabilitated in 90 percent of the protected areas. However initial project targets for PA infrastructure were achieved by only 50% due to the five year delay in start of the infrastructure investments and the associated increase in construction costs (ICR, page 15).
- The Protected Areas Sustainability Plan was approved by Parliament and 22 PA were officially gazetted as new park systems.
- As part of implementation of the Protected Areas Sustainability Plan, the project supported rationalization and demarcation of PA boundaries. About 600 kilometers of park boundaries were

- surveyed and over 1,150 kilometers of park boundaries were marked. This constituted about 80% of the planned target of 1,436 km.
- A number of activities were implemented under the project to win community support for the parks and convince communities that the PAs were an economic benefit to them. Extensive consultations were carried out with local communities to stop livestock grazing inside PA boundaries and avoid further degradation of the PA habitat. 20 percent of gate revenues were shared with communities.
- According to the project team, training programs were provided to communities and the Uganda's People Defense Force on the importance of wildlife conservation in the PA areas.
- The project provided support to the Department of Antiquities and Museums that included: (i) upgrading the Uganda National Museum in Kampala (re-roofing, building of on-site cafe, update of information displays, purchase of vehicles for site inspections); (ii) gazetting of 10 archaeological and other cultural sites and developing a full cultural site registry (the project target was 40 gazetted cultural sites); (iii) developing the Fort Portal and Kabarole heritage trails; and (iv) developing advertising materials to further promote Uganda as a destination of cultural and natural interest. Tours to the Uganda National Museum and regional sites were included in tourist package tours.

Outcomes

- The ICR reports that populations of key animal species buffalo, waterbuck, elephant, Ugandan cobb, hippo and lion, increased in all project targeted protected areas (PAs) (ICR, page 15). It attributes the increase to natural animal regeneration due to higher efficiency of ranger services, including better control of poaching and encroachment in PAs. Although the ICR provides no absolute numbers of the animal population increase to judge the significance of the animal population growth, IEG was able to find data on the internet that indicated that there was a significant resurgence in most species In Uganda's PAs since around the year 2000. This trend continued with some variation by park and species up until at least 2010. (For example, buffalo increased in Murchison Park from 3,889 in 1999 to 11,004 in 2010 and giraffes from 347 to 904. Elephant age distributions support a hypothesis of recent population growth.) IEG accepts that some of this resurgence in the more recent period can plausibly be attributed to the better protection resulted from the project, alongside broader security changes across the country.
- The ICR cites the increase in tourism visits from a baseline of 40,000 visits a year to 170,000 visits at project closing, with the vast majority of them to the Protected Areas, as well as to Museums and Cultural Heritage sites. The 170,000 tourist visits to the country generated total tourist revenue of US\$662 million for 2010, or more than US\$ 3,894 per tourist. The project targets on PA visits increase was achieved to 71% (ICR, page 15, 37). However how much of this increase in tourist visits can be attributed to the project activities is not clear. Other factors that were likely to significantly contribute to the tourism increase in Uganda over the project period were improved tourism security and better diversification of tourism activities (boating, water sports, hiking, climbing, etc.).
- The number of Protected Areas showing conflict with communities decreased from a baseline of 19 to 2 at project closing, constituting about 90 percent achievement of the project target (ICR, page 19).
- (b) **To achieve cost-effective management of Uganda's wildlife and cultural resources:** Rated Substantial

Outputs:

- The project supported institutional strengthening of Uganda Wildlife Authority, Uganda Wildlife
 Education Center and the Department of Antiquities and Museums. More than 1,500 rangers and
 200 senior staff in protected areas management were trained. Field staff morale improved through the
 introduction of competitive pay packages, provision of uniforms and equipment such as tents, radios,
 and vehicles.
- The project supported capacity building of Uganda Wildlife Authority in financial control and management, specifically, in financial records maintenance and reduction of financial leakages, and introduction of the Financial Procedures Manual.

Outcomes:

- Improved financial control procedures at Uganda Wildlife Authority (UWA) resulted in enhanced
 accountability in expenditure and revenue reporting and increased revenue collection. The revenue
 collection increased by up to 40 percent without a corresponding increase in visitation, while
 expenditure on fuel and vehicle maintenance fell by about 30 percent. To ensure financial
 sustainability of its operations, UWA was successful in building up its reserve funds. At project closing
 it had a reserve fund of approximately US\$ 5.7 million accumulated.
- Financial sustainability of Uganda Wildlife Education Center (UWEC) was improved, achieving 95 percent of recurrent cost coverage (86 percent of the project target). UWEC also established an endowment fund of US\$920,000 enhancing financial sustainability of its operations. UWA's internally generated revenues increased by over 350 percent over the 8 year period 2002-2011. The ICR attributes the increase in the revenues to the improved financial control and management, and to increase in wildlife numbers in protected areas, which has attracted higher numbers of tourists (ICR, page 17).

5. Efficiency:

- No project ERR or FRR were estimated at appraisal. An attempt was made in the ICR to estimate an economic rate of return on the project investments. The analysis assumed that the project contributed to 3-5% of the increase in tourist visits to the country over the implementation period. The calculated ERRs ranged from 8% to 17%, respectively. The ICR does not substantiate why this level of project contribution to the national tourism increase was assumed. No details of other assumptions used in the analysis (discount rate, stream of investment cost, etc.) are provided in the report.
- While there were some improvements in financial control procedures, overall administrative efficiency of the project was poor. The project closed 3.3 years later than planned at appraisal. Major contributing factors were inadequate Board oversight that led to poor performance on procurement, political interference, inadequate counterpart funding, high staff turnover and corruption in the use of project funds routed via the Ministry of Tourism, Trade and Industry (ICR page 27). The five year delay in the start of the infrastructure investments increased construction costs due to inflation and led to the reduction of project scope for example, only 50% of the staff housing was completed. Thus, while the total project cost was about the same, the project did not fully achieve its intended output targets. In addition, this led to an increase in project management costs from the planned US\$0.80 million to US\$1.2 million.

Efficiency is rated Modest.

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

Rate Available? Point Value Coverage/Scope*

Appraisal No

ICR estimate Yes 8% 100%

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

6. Outcome:

The relevance of objectives and design are substantial. On balance, the achievement of the sustainable wildlife management objective is rated substantial as well the objective of improving systems for cost effective management. However, efficiency is rated modest for a number of reasons including a five year delay in starting infrastructure investments. Based on these ratings, the project overall outcome is rated moderately satisfactory.

a. Outcome Rating: Moderately Satisfactory

7. Rationale for Risk to Development Outcome Rating:

Financial sustainability of the project is enhanced through improved revenue generation and the creation of reserve funds of approximately US\$ 5.7 million in April 2011 (ICR, page 23). At project closing, the Uganda Wildlife Education Center demonstrated 95 percent recovery of its operations costs.

Boundaries for almost all Protected Areas were clearly marked under the project and 22 Protected Areas and 10 new archeological and cultural sites were officially gazetted providing a legal basis for their sustainable management.

At project closing, the Wildlife Authority had no Board of Trustees or permanent top management and all top positions were filled only in acting capacity. This poor governance situation could seriously jeopardize the sustainability of project outcomes. There were also political risks that the resources provided under the project reserve funds of the Wildlife Authority would be used for non- wildlife management purposes. However, according to the information provided to IEG by the project team, UWA operated successfully in the post -project period of 2011-2012 and demonstrated increases in visitor numbers to the protected areas and revenues.

Additional risks derive from oil exploration occurring in the Albertine Graben area where seven national parks and seven wildlife reserves are located. Oil exploration may pose serious threats to the ecosystems because of new roads, and spillage of oil and other toxic chemicals (ICR, page 24).). UWA has taken a lead in monitoring of oil explorations impacts and defining mitigation measures.

a. Risk to Development Outcome Rating: Moderate

8. Assessment of Bank Performance:

a. Quality at entry:

The project preparation built upon years of groundwork conducted through the previous project and benefited from lessons learned in that project. However there were significant shortcomings in quality at entry. Risk associated with governance issues was seriously underestimated at preparation stage. The governance failures were significant and included disruptive political interference in project implementation (including procurement issues) and slow internal mechanisms for correcting identified implementation problems (ICR, page 25). The underestimation of security risks led to reduced scope for actual PA boundary marking by almost 20 percent. The project preparation could have been more effective in anticipating these issues, with more explicit measures identified to mitigate the risks. Another shortcoming was inadequate institutional analysis of the governance risks to implementing agencies which contributed to significant underachievement of the infrastructure development targets.

Another significant shortcoming in quality at entry was an environmental rating of the project as a category 'C' under OP4.01 Environmental Assessment. The ICR (page 12) notes that in retrospect, the project should have been rated as Category B because it included infrastructure development activities. The environmental impact assessments conducted by the government for infrastructure components resulted in modifications of some infrastructure designs to meet the construction specifications in earthquake zones.

The project initial result framework was weak in specifying the project targets. This led to the need to significantly revise key performance indicators several times during project implementation (ICR, page 11), however the objectives were not changed so the project was never formally restructured.

There was no QAG assessment for this project.

Quality-at-Entry Rating : Unsatisfactory

b. Quality of supervision:

According to the ICR, the Bank was proactive and responsive in providing advice during implementation, identifying bottlenecks and introducing changes to address the issues. The Bank responded promptly to requests for re-allocations of funds, extension of the closing dates, and "no objections". However, while the Bank response was timely and appropriate in most cases, supervision could have been more effective in identifying and addressing risks to achieving some project targets in a more timely manner. Despite the significant implementation issues ,including several implementation delays and higher implementation costs for some activities, all Implementation Supervision Reports but one rated the project satisfactory. According to the supervision reports, the realization of the project development objective was never at risk. This judgment contradicts the fact that a number of the project development targets were underachieved at completion.

Quality of Supervision Rating : Moderately Satisfactory

Overall Bank Performance Rating: Moderately Satisfactory

9. Assessment of Borrower Performance:

a. Government Performance:

An important weakness of government performance was the failure to meet its obligation on counterpart funding. The Bank remedied the shortfall in counterpart funds by providing 100 percent funding effective July 2005 however this could not mitigate the already incurred implementation delays. Other drawbacks in government performance were political interference in addressing agricultural encroachment and pastoralist issues, and politically motivated boundary conflicts in some protected areas. A significant governance issue arose with respect to the Uganda Wildlife Authority reserve fund that was established to ensure sustainability of its operations. The Government acted illegally in appointing a new Board for the Authority and in subsequently firing all the Authority's senior management. These actions could have led to the use of the reserve fund for inappropriate purposes threatening the project achievements and sustainability. In each of these cases, governance issues called for a strong and unified response on behalf of Bank management. In all cases, the situations were resolved eventually, in some cases through court intervention.

Government Performance Rating

Unsatisfactory

b. Implementing Agency Performance:

For the first two and a half years, the Project Management Unit was located in the Ministry of Industry, Trade and Tourism. Thereafter responsibilities were devolved to the four implementation agencies. The statistics, wildlife, and certification divisions in the Ministry of Industry, Trade and Tourism demonstrated low capacity and experienced poor governance that caused delays to procurement and project progress. This was remedied by the Bank by placing high reliance on external consultants for project implementation. The Uganda Wildlife Authority demonstrated good performance reflected in the output/outcome indicators. In particular, the field staff demonstrated strong commitment to the project, often well beyond the call of duty. Agency management and the PCU worked reasonably well with respect to procurement, financial management and reporting functions, offsetting early internal governance failures that caused substantial implementation delays and cost over-runs. The Uganda Wildlife Agency and Uganda Wildlife Education Center successfully introduced their own cost recovery mechanisms through gate entries, use permits and concession arrangements. Prudent use of these mechanisms has enabled both organizations to improve their long-term financial sustainability. The Department of Antiquities and Museums demonstrated strong institutional capacity by the time of the Mid Term Review, for this performance it was allocated the additional remaining funds towards its activities. This resulted in a 200% achievement of its project

targets within the original project implementation period of 5 years. Overall, capacity-building efforts did not materially improve the situation in those agencies, although specific targets for training and deliverables were achieved.

Implementing Agency Performance Rating : Moderately Satisfactory

Overall Borrower Performance Rating : Moderately Unsatisfactory

10. M&E Design, Implementation, & Utilization:

a. M&E Design:

The project's initial results framework was rather weak at the design stage. This framework did not adequately link indicators to project objectives. It also was weak in specifying the main assumptions for reaching the targets and identifying sources for the monitoring data (ICR, page 11). This led to the need to revise the set of results indicators during implementation. The results framework had shortcomings and key performance indicators were revised several times during the project implementation (ICR, page 11).

b. M&E Implementation:

Changes to the set of results indicators were introduced around the time of the Mid Term Review making some key performance indicators more specific and verifiable. A number of financial indicators were added to improve M&E to track the effectiveness of management of wildlife resources. Indicators for Uganda Wildlife Authority staff housing and boundary demarcation were also added. Each implementing agency was individually responsible for its respective M&E reporting. While the revised indicators captured the sustainability aspect of the development objectives, they could have more explicitly captured the improvement of cost effectiveness of the management of cultural and wildlife assets.

c. M&E Utilization:

The ICR contains no detail on M&E utilization.

M&E Quality Rating: Modest

11. Other Issues

a. Safeguards:

The project was rated as an environmental category 'C' under OP4.01 Environmental Assessment, which did not require an environmental management plan. The ICR (page 12) noted that in retrospect, the project should have been rated as Category B because it included infrastructure development activities, although small scale within the protected areas. The Uganda Wildlife Authority conducted its own environmental impact assessments for infrastructure components, following Uganda regulations and the Bank EIA approach. This resulted in modifications of some infrastructure designs to meet the specifications of buildings in earthquake zones. Although OP4.12 Involuntary Resettlement was thought to be applicable during appraisal, the ICR (page 12) stated that there were no resettlement activities because "the Government redrew boundaries of the three parks so that there were no communities residing inside the protected areas". IEG however notes that while there was no physical relocation, the redrawing of the park boundaries might have led to the loss of grazing land and other assets with disruption of livelihoods of the local communities. It was not clear from the ICR if social assessment of such potential project impacts had been conducted.

b. Fiduciary Compliance:

The project faced some procurement compliance issues due to misunderstanding by the Government of

the role of the Wildlife Authority's Board in the procurement process, as designated by the procurement committee and the procurement act. This led to delays in bidding and some procurements had to be re-initiated. This contributed to the first project extension to June 30, 2010 that was necessary to complete the infrastructure investments. The procurement delays also resulted in significantly higher costs for infrastructure, reducing project efficiency. The ICR contains no reporting on financial management aspects of the project and audits results. The Task Team Leader clarified to IEG during an interview that a financial management system was established following the Bank's guidelines and all project audits were unqualified.

A post-project Commission of Inquiry into "value of money" was requested by the Minister of Tourism, Trade and Industry in March 2011. The Commission's report was delivered in October 2011 and, inter alia, suggested problems in quality of infrastructure construction financed by the project. The World Bank final supervision missions conducted visits in a number of protected areas where the project supported new construction and confirmed high quality of the works. A post-completion independent engineer review was planned to provide additional information on the issue.

c. Unintended Impacts (positive or negative):

d. Other:

12. Ratings:	ICR	IEG Review	Reason for Disagreement / Comments
Outcome:	Moderately Satisfactory	Moderately Satisfactory	
Risk to Development Outcome:	Moderate	Moderate	
Bank Performance :	Moderately Unsatisfactory	Moderately Satisfactory	According to the IEG ICR Guidelines, with Outcome rated Moderately Satisfactory, the aggregate Bank Performance rating moves to Moderately Satisfactory
Borrower Performance :	Moderately Unsatisfactory	Moderately Unsatisfactory	
Quality of ICR:		Unsatisfactory	

NOTES:

- 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:

The ICR includes the following lessons:

- Governance challenges need to be adequately assessed at preparation and possible
 mitigation measures identified and put in place. Implementation effectiveness was
 compromised by a number of governance issues, including several cases of political interference
 throughout the life of the project. The Bank management should have been more proactive and
 supportive of project teams by having a plan on how to effectively address significant governance
 failures and taking a strong stand on the legality of some actions.
- Effective capacity building may take far longer than a single project cycle. The two projects

together, the Institutional Capacity Building and Protected Areas Management and Sustainable Use projects, worked in succession to provide a sustained support to capacity building in wildlife management in Uganda.

• Effective donor cooperation is an essential risk mitigation factor in project implementation. The early involvement of the EU and other donors with the sector created the enabling environment for the project to pursue its specific objectives. At later stages many donors left the sector due to governance issues and the Bank was relatively isolated at a critical implementation time.

4. Assessment Recommended?	○ Yes ● No

15. Comments on Quality of ICR:

The ICR describes and analyzes well the limitations of the project and is open about the aspects in which the project did not progress well. However, discussion of, and evidence on, the impacts of the management improvements on the parks is weak in a situation where more evidence was available. There are some errors in the presented outcome indicators and inconsistencies between the main text and Annexes in reporting project costs and output / outcome. This led to difficulties in reaching conclusions on the ratings. One component (5) is completely missing from the ICR project description. The ICR contains no reporting on financial management aspects of the project and audits results. On balance, the ICR is rated unsatisfactory.

a. Quality of ICR Rating: Unsatisfactory