



1. Project Data

Project ID
P070885

Project Name
NA-GEF Coast Conserv & Mgmt (FY06)

Country
Namibia

Practice Area(Lead)
Environment & Natural Resources

L/C/TF Number(s)
TF-55983

Closing Date (Original)
31-Dec-2015

Total Project Cost (USD)
28,740,000.00

Bank Approval Date
01-Sep-2005

Closing Date (Actual)
31-Dec-2015

	IBRD/IDA (USD)	Grants (USD)
Original Commitment	6,825,000.00	4,900,000.00
Revised Commitment	6,804,829.04	4,879,829.04
Actual	6,802,097.64	4,879,829.04

Sector(s)
Other Agriculture, Fishing and Forestry(50%):Central Government (Central Agencies)(25%):Sub-National Government(25%)

Theme(s)
Environmental policies and institutions(40%):Biodiversity(40%):Other environment and natural resources management(20%)

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2. Project Objectives and Components

a. Objectives

Project Portal Project Development Objective:

Development/Global: Strengthened conservation, sustainable use and mainstreaming of biodiversity in coastal and marine ecosystem in Namibia

Financial Agreement Development Objective:

The Global Environmental Objective (GEO) of the project was: to assist the recipient to conserve, use sustainably and mainstream the biodiversity of the Namibian coast.

In assessing the achievement of objectives in Section 4 below, this objective is broken down into three parts: (i) the conservation of coastal biodiversity; (ii) increased sustainable use of biodiversity; and, (iii) mainstreaming biodiversity in strategies and plans.



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

No

- c. Components

There were four components (the costs given by component cover both the original grant total of US\$4.9 million and the Additional Financing grant of US\$1.92 million) .

Component 1. Policy, legal, institutional and planning framework for integrated coastal zone management. (Appraisal US\$0.92 million; Actual US\$1.22 million). This was to develop a policy and legal framework for coastal zone management consistent with national development objectives including a review of existing policies and laws and support for necessary revisions; a review of institutional mandates and support for necessary revisions; (iii) the development of the Namibia Coastal Management White Paper; and, (iv) support for the coastal management mechanism and financial sustainability.

Component 2. Targeted Capacity-building for Integrated Coastal Zone Management. (Appraisal US\$1.63 million; Actual US\$1.95 million). This supported mainstreaming of coastal biodiversity and resources, in particular addressing the lack of capacity at national, regional and local levels. It included: (i) awareness raising and training; (ii) upgrading of monitoring and evaluation; and, (iii) communications and knowledge management.

Component 3. Targeted Investments in Critical Ecosystems for Biodiversity Conservation and Sustainable Use. (Appraisal US\$2.80 million; Actual US\$2.37 million). This supported the overall framework for integrated coastal zone management through targeted investments and activities in coastal biodiversity conservation aimed at sustaining and increasing economic benefits from sustainable resource-based activities. It included: (i) management planning for coastal ecosystems; and, (ii) priority actions under the management plans at site and landscape levels.

Component 4. Project Coordination and Reporting. (Appraisal US\$1.48 million; Actual US\$1.28 million). This supported the establishment and operationalization of a Project Coordination Office through staffing, office infrastructure and project management related capacity building.

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

Project Costs

Total Project Costs including both the original US\$4.90 million and the additional US\$1.92 million, were US\$6.83 million. Total Project Costs at closing were almost the same other than minor exchange rate changes at US\$6.80 million.

Financing and Borrower Contribution

There was no direct borrower contribution although the borrower was already funding a range of activities at central, regional, and local levels in coastal biodiversity conservation. Financing therefore including the original and additional financing was the same as project costs i.e. US\$6.83 million at appraisal and US\$6.80 million at closing.

Dates

The project became effective on October 17, 2005. There were restructurings, on April 27, 2011 to extend the project for one year due to implementation delays and due to the proclamation of new protected areas that triggered the Bank's safeguard policy. On April 30, 2012 there was a further extension of eight months due to further implementation delays. On December 20, 2012 a further three years was added to the project extending it with additional financing to December 31, 2015. This was to scale up and add activities on top of the first phase at which point the results framework was revised. Note that, with the restructurings there was a delay of one year and eight months beyond the original closing date but at that point the additional financing was added which extended the project period and for the extension period closed on time.

3. Relevance of Objectives & Design

- a. Relevance of Objectives

The project was included in Namibia's updated National Biodiversity Strategy and Action Plan (2013 to 2022). The Bank's most recent Country Partnership Strategy (2014 to 2017) affirms support for environment and natural resource management and the need to share the benefits of these ecosystems widely. It lists the project as one of the proposed activities. The project is also consistent with the GEF Operational



Program 2 for Coastal, Marine and Freshwater Ecosystems. In addition to these strategic linkages already in place and that continued, the project itself was to be instrumental in further developing strategic thinking. In this sense, the project was relevant to the emerging strategies but the emerging strategies also drew from the learning of the project.

Although, as noted by the ICR (p.9), the GEO was ambitious in relation to the constraints to sustainable coastal management as well as the funding, on balance Relevance of Objectives is rated **High**. The project represented a significant shift in direction in "assisting the recipient to conserve, use sustainably and mainstream biodiversity ..".

Rating
High

b. Relevance of Design

The ICR reports that the design allowed flexibility and responsiveness allowing the project to adapt to evolving pressures on the coasts and unforeseen demands from stakeholders such as ministries, municipalities, and the private sector. The project drew from the lessons from other biodiversity projects. However, although the three main outcome indicators in the Results Framework were not unsound and were clearly articulated, the large number of 43 poorly grouped indicators at the intermediate outcome level were excessive and confusing. In aggregate, they poorly reflected the core elements in the theory of change by overwhelming them with indicators of a different order. These indicators were later changed and simplified at the time of additional financing. They could have been improved sooner. Also, the ICR notes (p. 12) that project design could have anticipated the extended processes of policy and legislation adoption either by initially planning for a longer implementation period or by phasing and prioritizing. The design and implementation arrangements had a significant focus on political commitment which proved to be valuable. Relevance of Design is rated **Substantial**.

Rating
Substantial

4. Achievement of Objectives (Efficacy)

Objective 1

Objective
The conservation of coastal biodiversity.

Rationale

The main contributions to the conservation of coastal biodiversity sub-objective were the following:

1. *Legal establishment of parks.* A major achievement of the project was to directly support the proclamation of three national parks ensuring that the entire Namibian coast was protected under a mega park, the Namib-Skeleton Coast National Park covering nearly 11 million hectares. The three new parks were: (i) Sperrebiel/Tsau/Khaeb National Park created in 2008 (2.6 million ha); (ii) the Namibian Islands Marine Protected Areas, gazetted in 2009, protecting nearly 1 million actors of coastal waters and sea around 18 islands and islets; and, (iii) the Dorob National Park, created in 2010, some 200 km of a 25 km wide strip from Walvis Bay to the Ugab River.
2. *Protection of, and utilization of, biodiversity.* While all the component parks were of value in this respect, the Dorob Park was of particular importance because it surrounds three fast-growing cities, Walvis Bay, Swakopmund, and Henties Bay and includes some of the largest economic contributors particularly mining and fishing.
3. *Improving the governance of coastal areas with respect to sustaining biodiversity while ensuring equitable benefits.* Governance was improved by the following means: preparation of management plans, training, monitoring and evaluation, the preparation of contingency plans (e.g. to reduce damage from uncontrolled desert driving in the dune belt) and matching grants in park infrastructure.
4. *Actual Park Management Performance.* The quality of management of the parks was assessed quantitatively and qualitatively using an



adaptation for Namibia of the widely used Management Effectiveness Tracking Tool (METT). The Namibia version was the Namibia Management Effectiveness Tracking Tool (NAMETT). Utilizing this, Sperregebeit, Tsau/Khaeb Park was rated High, Namibian Islands was rated Good, and Skeleton Coast Park was rated Poor, Cape Cross Seal Reserve was rated Intermediate. New NAMETT ratings for these parks is expected soon. The project failed to improve the management scores to targeted levels for the Dorob Park and the Namibian Islands Park. The former, despite support for demarcation and provision of specific matching grants of (US\$100,000) increased its score only from 58 to 63 against a target of 70, so a gain of about 40% of the targeted increment. This was due to a lack of staff and budget from the Ministry of Environment and Tourism (MET). In the case of Namibian Islands, despite a US\$33,000 equivalent matching grant, the gain was from 95 to 101.5, short of the targeted 115, about a 30% of the targeted increment. This was due to a lack of an approved management plan and a shortfall in permanent staff. While it is not entirely clear how these management performance ratings should be weighted in relation to the project's share of input as an attribution measure, it is clear that improved management performance on the ground at the park level was strong in some parks and weaker in others although even in the two that did not meet management targets, there was improvement.

In conclusion, although there is somewhat limited evidence of intermediate outcome or outcome level impacts, the achievement of the conservation of biodiversity is rated, on balance, Substantial. The essential institutional and process focus of the project, that had to start mainly with enabling legislation, turned out to be a slow political process, but was largely achieved. It is still early to expect many measurable increases in biodiversity but it would be reasonable, at this point, to have expectations of impact in the future provided the momentum is sustained. Sustainability is addressed in the Risk Section.

Rating
Substantial

Objective 2

Objective

The increased sustainable use of coastal biodiversity.

Rationale

The main indicator for the increased sustainable use sub-objective was the increased number of people engaged in sustainable use activities supported by the project. (It is not entirely clear why the specified indicator engagement in sustainable use was only in activities supported directly by the project since the project was supporting the wider strategic and policy areas.)

The following were the main achievements, mostly at an output or intermediate outcome level.

1. On the impact of matching grants and the measurement of sustainable activities, a total of 12 matching grants for a total of US\$640,000 equivalent were provided. Six of these supported sustainable use of coastal biodiversity mostly investing in sustainable tourism infrastructure and conservancies. The other six grants aimed at improving management, for example the management support for the Namibian Islands Protected Area. The sustainable use activities, derived from a study by Barnes and Alberts, 2011, included mostly tourism, some of the fishing activities, fish processing, aquaculture and salt production. The study assessed that approximately 21,000 people were engaged in such sustainable activities, up from 15,000 in 2007. By the end of the project the number had increased to 33,000. This represents a substantial increase from the indicator target increase of 20%. However, the ICR (p. 15) notes that the indicator is debatable since the subsectors in this assessment were treated generically and it is not entirely clear which particular activities were truly sustainable and grounded in sound assessments. Moreover, as the ICR also notes, it is not clear what proportion of this increased number of participants was actually attributable to the project.

2. There was a delay in matching grants and a proposal quality problem. One problem in assessing the impact of matching grants is that they were delayed substantially during implementation. Out of the 12, two were canceled and most of them required extensions and also required the addition of the additional financing to achieve completion. The ICR diagnoses this as due to overambitious feasibility assessments and plans, a failure to get matching resources, and insufficient commitment. The project tried to resolve the problem of the quality of the proposals by hiring a consultant at the end of 2009 to assist potential applicants. This helped quality.

In conclusion, given the substantial delay in the implementation of the matching grants and the quality problem and given the uncertainty and lack of evidence about the sustainability of particular activities, the achievement of this objective is rated Modest.



Rating
Modest

Objective 3

Objective
The mainstreaming of coastal biodiversity in strategies and plans.

Rationale

The following were the achievements in the mainstreaming, mostly at an intermediate outcome level:

1. The ICR reports that the adoption of the National Policy on Coastal Management was attributable to the project. The process was much longer than expected, eventually taking seven years, completing in September 2012, but it was achieved.
2. Following this national policy, using the additional financing, the project prepared the Integrated Coastal Zone Management Bill, a legislative instrument. This was expected to be adopted in 2016 but while approved in principle by cabinet awaits a further consultation round. (See further discussion under Risk to Development). This is important to the aims of the project because it establishes the proposed Coastal Zone Management Authority. It is proposed that this will take over from the project coordination office. It is considered essential to program sustainability.
3. The project provided technical assistance for the preparation, review and updating of a range of planning documents including four strategic Environmental Assessments in 2012 for each of the four coastal regions with an update in 2015.
4. Updating of the State of the Environment Report.
5. Several land-use and tourism development plans.
6. Updating of marine tourism regulations.
7. A draft of a waste management policy.
8. Sensitivity maps for the National Coastal Contingency Plan.
9. The development of the second National Biodiversity Strategy and Action Plan. (However, the ICR notes (p.16) that “the utilization of these documents and coastal planning could not be assessed”.)
10. A total of 694 people were trained by the project and over 300 communication activities were conducted. Training, capacity building, communication and awareness raising targeted national and local governments, environmental and coastal development managers, the private sector, communities, and NGOs. The areas of training included community-based natural resource management, environmental education, environmental assessment, environmental impact assessment, geographic information systems, law enforcement, and resource economics. There was also a range of support for publicity and communications including newspaper articles, websites, radio programs, advertisements, educational material. There was a particular focus on schools.

In conclusion, the mainstreaming of an approach to coastal biodiversity appears to have been successful at the strategic and policy level. Although evidence is limited, it also appears to have been partly successful at the operational level with government staff, the private sector and communities. However, beyond some anecdotal evidence, there is so far little outcome level evidence presented of changes in attitudes of individual stakeholders at the application end, for example safari vehicle drivers, fishermen, lodge or campsite managers or livestock owners. A stakeholder and beneficiary survey would have been useful. However, on balance, given the success at the important strategic, policy and capacity levels, the achievement of this objective is rated Substantial.

Rating
Substantial

5. Efficiency

The PAD contains an incremental cost analysis, partly qualitative partly quantitative. The estimated baseline scenario in the PAD as a sustained without project investment was US\$50.12 million which appears methodologically to be generally sound. The original cost of the GEF project was to be US \$4.92 million. This was subsequently topped up with the additional grant of US\$1.92 million. So the total at closing was therefore a really quite modest initial planned increment of about 13% over the baseline assumed investment in the PAD.



The actual performance of the tourism sector in Namibia has been high. In 2011 the tourism sector along the coast belt achieved a considerably higher than projected 5% employment with annual employment growth rates reaching about 8%. As noted by the ICR (p. 18), Namibia is one of the fastest-growing tourism destinations in the world with a 6% average annual growth rate between 2010 and 2014. It has been, over the project period, a booming industry.

Clearly, the project cannot claim to have created all or even a substantial proportion of this coastal tourism growth and, in any case, the project was not predominantly promoting tourism but protecting the biodiversity on which tourism ultimately depends. The efficiency question is therefore twofold and quite complex. First, projecting into the future what would be the impact on biodiversity of tourism growth along the coastal belt for a sustained period of time at about 8%. To what extent would this large increase in tourism, through its impact on fauna, flora and soils/desert sands, threaten its own existence through loss of biodiversity from damage. Second, to what extent this particular investment, within the context of the total program, reduce that threat to biodiversity and therefore, ultimately, the threat to tourism income and other natural resource-based income such as fishing.

There is no easy quantitative means beyond educated guesses of estimating the losses from inaction in the without-project situation or the incremental benefits in terms of biodiversity and therefore tourism benefits from the with-project action. However, what can be said is that the total amount invested of US\$6.80 million actual expenditure appears very small in relation to the extent of institutional change and to the total longer term discounted value of coastal tourism. (There is a weakness in the ICR in not presenting an estimate of the value of coastal tourism in the efficiency analysis). IEG found evidence that the estimated value of coastal tourism in 2008 was about US\$70 million annually (Alberts and Barnes 2008) based on accommodation, tour operation and tourism-related values e.g. car rental and restaurants. It is no doubt considerably more now; at an 8% annual increase it would be about US\$129 million by 2016. Against some US\$130 million annually, an investment of about US\$7million spread over seven years needing to pull in about US\$1.4 million a year to give a 20% return would mean that the project would have to sustain an increase (or more meaningfully given the objective, reduce a decline) of a little over 1% of the value of coastal tourism annually. Such a modest level of incremental benefit seems a very plausible achievement from the legislative and strategic changes and the supportive grants. But this would be true only provided that operational funds to implement can be sustained.

In terms of operational efficiency, there were positive and negative elements. On the positive side, as noted by the ICR (p. 18), there were no cost overruns, no missed procurement, and the project closed on time for the additional financing phase. The management component of the project cost 14% less than the appraisal projection. The ICR also argues correctly that adding the additional financing had a very low transaction cost (presumably for both parties) since all institutional mechanisms, as well as the project strategy and design, were already in place.

On the negative side, not noted in the ICR Efficiency section, the initial project made somewhat slow progress and effectively closed one year and eight months late. It was originally planned to close on April 30, 2011 and the project had to be extended twice to be picked up on December 20, 2012 by the additional financing. Between the middle of 2007 and the end of 2009, six of the seven supervision missions rated the project only Moderately Satisfactory partly due to slow progress in some areas.

Mainly because of the small total project costs against the value of the tourism industry in the coastal area and the fragile nature of much of the environment leaving a potential for severe impact on biodiversity and therefore on longer term tourism, Efficiency is rated **Substantial**.

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



The Relevance of Objectives is rated High and Design Substantial. Of the three Efficacy sub-objectives, the objective of supporting coastal biodiversity is rated Substantial, the objective of sustainable utilization is rated Modest partly on the grounds of limited evidence on utilization, and the mainstreaming objective is rated on balance Substantial. The most important project achievements as a basis for future protection and tourism were the extension of the protected areas along the entire coastline, the adoption of the National Policy for Coastal Management, and the submission of the Integrated Coastal Zone Management Bill to the cabinet. While this is still pending final consultation and decision, it is not without promise. There is cabinet agreement in principle. Efficiency is difficult to estimate but there are two important qualitative indicators with some quantitative basis. First, project costs were low compared with the rapidly rising benefit stream from tourism which is largely predicated, over the longer term, on sustaining biodiversity. Second, the support of the project in establishing the legislative and institutional base for future coastal zone conservation gives a reasonable expectation of a stream of future environmental benefits measured as the increment between sustaining biodiversity through sound coastal zone management and a probable significant decline in biodiversity in the absence of such management. Overall, Efficiency is rated Substantial. Overall Outcome is therefore rated Satisfactory.

- a. Outcome Rating
Satisfactory

7. Rationale for Risk to Development Outcome Rating

Notwithstanding the achievements, the risk is **Substantial**. The main risks are the following.

1. Development pressure along the coast which may further threaten biodiversity.
2. The need for quite complex and challenging coordination within government at different levels to ensure the sustainability of a coherent coastal zone approach to biodiversity.
3. Uncertainty about the creation of the proposed Coastal Management Authority that would take up the work of the project unit.
4. The gap in financing pending the creation of that authority.
5. The risk that, in the absence of significant additional funding, the addition of these newly protected areas may simply spread an already limited government budget over a larger area of responsibilities.
6. There was lack of ownership among beneficiaries of some of the matching grants and there were implementation and management issues with some of them including, according to the ICR, at the Damara Tern Fencing where there is already a problem with maintenance, at the Walvis Bay Bird Paradise with high cost and questionable commitment, and at the Kuiseb Delta Development Project that has not yet reached the stage of sustainability.

Recent information passed on by the project team on the legislation and, through that legislation, the creation of a Coastal Zone Management Authority gives reason for some hope but some remaining concern. The ICZM Bill was tabled to the cabinet in June 2016 but was objected to by the Ministry of Fisheries and Marine Resources. It was referred to the cabinet committee on Economic Development and Trade. Following stakeholder consultations, it was "approved in principle" by cabinet on condition that the stakeholders must consult again and eliminate all conflicting issues. Whether it will be possible in such a complex web of relationships to resolve every conflict remains to be seen. The meeting for this resolution is scheduled for early November.

- a. Risk to Development Outcome Rating
Substantial

8. Assessment of Bank Performance

- a. Quality-at-Entry

The preparation of the project on the part of the government was well supported by a GEF Project Development Fund grant and, for the Bank, was partly piggybacked on other parallel projects. Project design was based on lessons arising from a prior pilot project and other Namibia project experience. Preparation and appraisal involved wide consultation with government since a core element in the concept was the development of newly created protected areas and parks including new legislation and institutional reform. For this reason, preparation could be seen as a part of the benefit of the project. The strategic and institutional reform dialogue with the government continued through project implementation. The Bank brought considerable skills to the process.

However, as noted by the ICR, there was some weakness in the original Results Framework. First, two of the three main GEO Indicators, Indicator 2 and Indicator 3, were not very carefully articulated making measurement difficult. Second, there was an excessive number of 43 Intermediate Outcome Indicators, some of limited value, others open to different interpretations. However, the revised framework following the



Additional Financing was a considerable improvement and was able to reduce the total of 46 indicators to 10 without any obvious loss of management utility. Nevertheless, even the original results framework demonstrated a fairly clear understanding of what was needed in terms of implementation.

One weakness that appears evident from the ICR, although not mentioned explicitly in it, is the excessive optimism about the time required to prepare, write, and pass environmental legislation. The ICR does not report on whether this particular legislation progressed slower than the average nor whether the appraisal assumptions about the anticipated time that this legislation would take to become law were based on average past processing times. However, there is an indication in the ICR (p. 21) that this slow processing could have been projected at appraisal since it says, "these delays do not reflect a lack of commitment ... But rather the relatively standard difficulties in advancing political cross sectoral and law reform processes". If they were standard they could have been predicted.

One moderate concern raised in the Borrower's completion report (ICR p. 53) that is otherwise positive is that it is difficult to implement projects of this type over such large areas and that more of a focus on hotspots for testing theories would have been better, although it does also note that the matching grants did allow for some focus. But to balance this point, it is clear that much of the project was institutional and process reform and capacity building which, by its nature is encompassing. The matching grants were only testing sites.

On balance, Quality at Entry is rated Satisfactory.

Quality-at-Entry Rating
Satisfactory

b. Quality of supervision

Supervision was generally sound and proactive. Emerging issues were well followed up. Weaknesses in design such as the Results Framework were addressed effectively. Support from missions was given towards the quite challenging unfolding reforms. The ICR notes that the Bank was able to achieve, "optimizing the scarce implementation support resources provided by the GEF" by spreading implementation support costs across other parallel projects, a sign of some efficiency in supervision, important for a small project such as this. There were two weaknesses. First, with an already identified need at appraisal for support in procurement for the Project Coordination Office, there was a delay of about one and a half years before a procurement post-review took place. The ICR reports that this identified issues in all of the contracts reviewed and consequently rated procurement unsatisfactory for a period. This led to a tighter focus on procurement and supervision more generally. The ICR argues that, by the midterm review, supervision performance had improved and was satisfactory. Second, there were four Task Team Leader's over the implementation period of 10 years. However, this is not referred to as a problem in the "summary of Borrower's ICR" (ICR Annex 4) and there were a number of overlapping mission members to support continuity. On balance, Quality of Supervision is rated Satisfactory.

Quality of Supervision Rating
Satisfactory

Overall Bank Performance Rating
Satisfactory

9. Assessment of Borrower Performance

a. Government Performance

Government here is considered to be both the central government at all levels and the regional and local governments. The ICR notes that full government commitment took some time to fully materialize. It did so by the time of the midterm review, over four years from the date of effectiveness. At the outset, government implementation capacity was limited and, although with some improvement, continued to be so.

Both the national and regional governments provided small undefined (by the ICR) amounts of cofinancing, although the ICR reports that this was often late. Since the amounts of borrower cofinancing are not reported in the ICR Financing table in Annex 1, it is not clear how much this cofinancing was as a share of total project costs and as a share of what was projected at appraisal.

The ICR reports on a particular weakness in management effectiveness at the Dorob National Park due to insufficient staff complement and budget allocation from the Ministry of Environment and Tourism.

The government is committed to continuing to finance the coordination office after project closing pending the creation of the new authority or at least until March 2017. (See the Risk to Development Section for the latest status.)

Government performance was quite mixed and commitment in the first half of the project was weak therefore, overall, Government performance is rated Moderately Satisfactory.



Government Performance Rating
Moderately Satisfactory

b. Implementing Agency Performance

While the implementing agency, which includes the Project Coordination Office and the Ministry of Environment and Tourism, played an important role in project preparation, difficulties were faced during the early years of implementation partly due to lack of familiarity with World Bank procedures.

The ICR reports that problems with the coordination office and the resignation of the Project Coordinator resulted in only a one third disbursement after three and a half years of implementation in a project originally planned to be five and a half years. There was a one year delay in most activities. However, there was a significant turnaround in implementation performance from the midterm review onwards. By early 2010 implementation was being rated satisfactory.

The ICR reports (p. 22) that in the final five years of the project (three of which were the additional financing years), the Project Coordination Office and the Ministry of Environment and Tourism, “displayed exemplary ownership of the project objectives and activities and efficiency in coordinating its implementation”.

Overall, the performance of the implementing agency, both the office and the parent ministry in its role as supervisor, was mixed with early weaknesses and slow takeoff. However, this was substantially made up for by much stronger performance from about the midterm review onwards into the extended project additional financing period. Therefore, on balance, implementing agency performance is rated Satisfactory.

Implementing Agency Performance Rating
Satisfactory

Overall Borrower Performance Rating
Moderately Satisfactory

10. M&E Design, Implementation, & Utilization

a. M&E Design

The Results Framework as designed had an excessive number of indicators and these were predominantly outcome focused. There was little baseline data. Baselines were established during the early years of the project. However, with a project tackling a new approach, lack of baselines is common unless they happen to be available from an earlier pilot. The weakness in the Results Framework and indicators was addressed through simplification at the time of the additional financing. While the new framework and indicators were an improvement, they still fell short of anything close to a biodiversity outcome. This is picked up also under implementation because it is something that might have been added later.

b. M&E Implementation

After early delays due to lack of capacity, the M&E framework was developed and an MIS system was established by early 2007. Consultants were brought in at times, for example at the time of the Mid Term Review. Some weakness is reported in the ICR in the lack of measurement of the numbers of female beneficiaries and the lack of reporting in Bank Aide Memoires of the management effectiveness tracking scores. But the latter were issues with the Bank's own reporting, although it appears partly due to lack of the M&E evidence.

The project supported the upgrading of an existing coastal and marine biodiversity M&E system linked to other national monitoring. It is not clear whether this data was fully utilized in the ICR for assessing biodiversity changes on the ground.

Although the amount of funding and the relatively short time period of five and a half years makes expectations for a significant scale of evidence of outcomes on biodiversity on the ground unreasonable, it would be reasonable to expect some modest level of measurement of impact, for example on the reduction of desert driving damage to fragile environments or changes in community group livestock or wildlife management.



c. M&E Utilization

The ICR reports use in terms of spotting delays in components and the sharing of data with the Steering Committee to achieve corrective action. Reportedly, the M&E arrangements are to remain in place after the project closure.

M&E Quality Rating
 Substantial

11. Other Issues

a. Safeguards

The ICR reports (p. 10) no safeguard issues. The project was rated as a Category B. The Environmental Safeguard OP 4.01 was triggered for an Environmental Impact Assessment. As required, an Environmental Management Plan was prepared.

However, later, when two new protected areas were to be gazetted at the time of the mid-term review, the Bank triggered the Involuntary Resettlement safeguard OP4.12. A Process Framework was prepared and approved after a Bank support mission. However, no actual resettlement of people or loss of livelihoods is reported.

b. Fiduciary Compliance

No major financial issues were reported. Annual audit reports were received on time and no major internal control weaknesses were reported. For most of the project, procurement was carried out from the government side by a full time procurement officer but there was limited capacity in the first two years. As noted earlier, a post-review Bank mission in 2007 found issues in all contracts and rated procurement at that time moderately unsatisfactory. Bank training ensued which improved the situation considerably. No major issues were encountered thereafter. Procurement was carried out in accordance with Bank Procurement Guidelines.

c. Unintended impacts (Positive or Negative)

None

d. Other

None

12. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Satisfactory	Satisfactory	---
Risk to Development Outcome	Substantial	Substantial	---
Bank Performance	Satisfactory	Satisfactory	---
Borrower Performance	Satisfactory	Moderately Satisfactory	Weak government commitment in the early years and late provision



		of government financing at national and regional levels
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

The following lessons are taken from the ICR with some rearrangement of points and adjustment of language.

- 1 . Successful integrated coastal zone management calls for: (i) a strong analytical foundation; (ii) extensive stakeholder consultation and transparency; (iii) an iterative and flexible design and process; (iv) particular attention to institutional arrangements and government commitment; (v) a focus on capacity building and awareness raising; (vi) a mix of top-down and bottom-up approaches; and, (vii) a balance between biodiversity and the sustainable utilization of natural resources.** In this project case, the targeted investments through grants created buy-in among stakeholders and provided some visible evidence of biodiversity and utilization achievements.
- 2 . Mainstreaming attention to biodiversity is a slow process and projects and programs should allow for this.** While an expectation of slow progress, especially on legislation, should be allowed for upfront in project design, in this case, it was accommodated, to some extent, by the later addition of the further additional financing. It is clear from the achievements of this project that there remains many more years of important, uncompleted, business.
- 3 . The inclusion of matching grants in a biodiversity and sustainable utilization project calls for attention to design during project preparation that may need to continue into implementation.** In the case of this project, there were quality shortcomings, delays, cancellations, and lack of ownership in the matching grant program. This could have been addressed better by pre-identification of potential investments, the hiring of dedicated staff for the grant preparation process from the outset, and local awareness raising and capacity building for the grant program during implementation.
- 4 . For mainstreaming attention to biodiversity, and therefore for sustainability, there is a need to identify and sustain champions to ensure support and funding beyond the project period.** In the case of this project, there is still a substantial risk that the ball will be dropped unless the more permanent solution of the proposed management authority is approved and established quickly.

14. Assessment Recommended?

No

15. Comments on Quality of ICR

On balance, the ICR is of substantial quality. However, it has some weaknesses as well as strengths. The main strengths are a generally well presented story with analysis of the achievement of sub-objectives and very thoughtfully formulated lessons.
Weaknesses, some minor some more significant, include:

- 1 . Lack of any early evidence of indicative achievements, for example, after many years of project intervention, was there any change attributable to the project and measurable in reduced damage from off-road driving, improved sustainability of fishing, changed community land management practices, or reduced poaching?
- 2 . There was no indication of government or beneficiary cofinancing in the financing table yet there seems to have been some contribution, especially in the matching grants.
- 3 . The Efficiency analysis might have offered more on the project cost relationship to the scale of tourism earnings. It could have attempted a break-even budget approach to show what scale of avoided tourism loss due to medium to long term loss of biodiversity and environmental damage would give a break-even rate of return to the relatively quite small project costs.



- a. Quality of ICR Rating
Substantial