



DESERTING THE SUNDARBANS

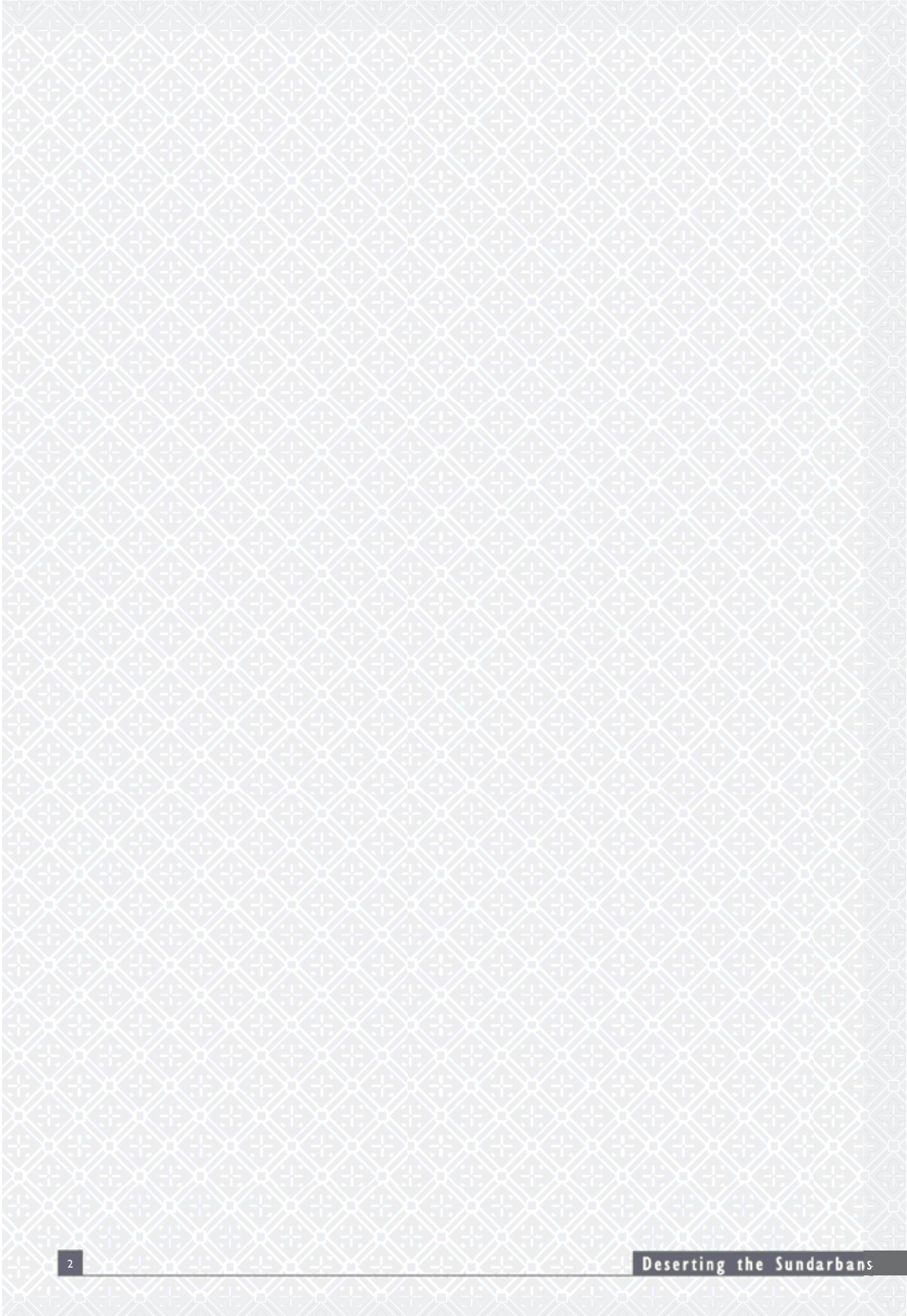
Local People's Perspective on ADB-GEF-Netherlands Funded
Sundarbans Biodiversity Conservation Project

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Unnayan Onneshan
The Innovators
centre for research and action on development







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Authors: Jakir Hossain and Kushal Roy

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CONTENTS	
ACCRONYMS	4
SUMMARY	5
INTRODUCTION	9
POLICY COMPLIANCE AND PROJECT IMPLEMENTATION RECORD	13
Adherence to GEF Policies	13
Public involvement and stakeholder participation	13
Project cycle	14
Operational programmes	15
Operational strategy	15
Treatment of ADB Policies	15
Information policy	15
Forest policy	16
Indigenous peoples policy	17
Gender policy and development	18
Environment policy	18
Anticorruption Policy	20
Financial Records of the SBCP	21
Planned Expenditure	21
Actual Expenditure	22
INDIGENOUS AND LOCAL COMMUNITIES' EXPERIENCES OF SBCP IMPLEMENTATION	25
Project Implementation Experiences	25
Environment	25
Socio-economic status and livelihood	26
SBCP Impact	29
Failure of the Project Design	31
Failure to understand importance of hydrology	32
Failing to identify causes of forest destruction and blaming the local communities	32
Failure to deliver local benefits	32
Heavy reliance on foreign experts	33
Turning a blind eye to timber extraction by officials	33
Lack of co-ordination	34
CONCLUSION AND POINTERS TO FUTURE DIRECTION	35
Conclusion	35
Defective participation	35
Few or no local benefits	35
Problem of project design	35
Violation of the rights of local people	36
Problematic approaches to alternative livelihoods	36
Pointers to Future Direction	37
Policy	37
Design	37
Management	38
Implementation	38
A Final Word : Accountability and Remedial Action	39
END NOTES	40
BIBLIOGRAPHY	41
ANNEXES	42

ACRONYMS

ADB	Asian Development Bank
ADTA	Advisory Technical Assistance
BCSWG	Bangladesh Civil Society Working Group
BFRI	Bangladesh Forest Research Institute
CBD	Convention on Biological Diversity
CoP	Conference of Parties
CSP	Country Strategy Paper
FAO	Food and Agriculture Organization
FD	Forest Department
FGD	Focus Group Discussion
FSMP	Forestry Sector Master Plan
FSP	Forestry Sector Plan
GEF	Global Environmental Facility
GoB	Government of Bangladesh
IP	Indigenous People
IUCN	World Conservation Union
LGED	Local Government Engineering Department
MoEF	Ministry of Environment and Forest
MSD	Mangrove Silviculture Division
NFP	National Forest Policy
NGO	Non Governmental Organization
PFM	Participatory Forest Management
PKSF	Polli Karma Shahayak Foundation
SAC	Stakeholder Advisory Council
SBCP	Sundarbans Biodiversity Conservation Project
SIEE	Summary Initial Environmental Examination
SIZ	Sundarbans Impact Zone
SRF	Sundarbans Reserved Forest
TA	Technical Assistance
TAG	Technical Advisory Group
TK	Traditional Knowledge
UNDP	United Nations Development Program
WB	World Bank

SUMMARY

The Sundarbans Biodiversity Conservation Project (SBCP) was the largest project of its kind undertaken by the government of Bangladesh (GoB). Its aim was to establish a proper management system for conserving the biological diversity and securing the environmental and biological integrity of the Sundarbans. The US\$77.3 million project was intended to take place between 1999 and 2006, but the implementing agency and co-funder, the Asian Development Bank (ADB), suspended the project in September 2003, citing problems with project design, the implementation of some activities, and financial management. The ADB then formally and unilaterally cancelled their commitment in early 2005, blaming Bangladesh's Forest Department (FD) for failing to take steps to revise the project.

The SBCP was undertaken with the objective to improve the declining biodiversity conditions of the Sundarbans through poverty reduction, participatory conservation and development. However, the project design framework failed to recognise the profound interdependence among the forest, its wildlife and its human inhabitants - the traditional resource users. This project was fundamentally flawed, as its primary effect was to destroy this interdependence by creating artificial, alien and short-term resource and livelihood systems for the local communities and indigenous people in the name of 'poverty reduction', and distance them from their ecosystem. The project also, consequently, failed to conform with the policies concerning the forest, environment, biodiversity and local communities' rights that were held by the funding agencies, the ADB and the Global Environment Facility (GEF). The project's documents did not clearly address how the proposed 'participatory forest management' and 'peoples involvement', in accordance with ADB and GEF policies, would be achieved within a national institutional and legal framework.

The project design also failed to understand the importance of hydro-geology in regulating the mangrove ecosystem. Moreover, it failed to address the actual causes of biodiversity reduction in the site. Therefore this research project raises the question as to whether its failure lay in its design or its execution.

The project entirely failed to accomplish transparency at any level, in contravention of policy statements by the GEF and ADB. Various project documents were classified as restricted, and its approach to 'transparency' and 'people's participation' remained



silent on accountability towards local communities. No legal mechanisms or opportunities were devised to challenge the non-performance or poor discharge of the project, such as the denial of livelihood opportunities for the local people.

The project left the monitoring of reserved forest mechanism to highly corrupt wings of the Forest Department (FD) of the GoB. The project thus merely created a temporary financial inflow into the FD, leading to grossly wasteful expenditure and unprecedented hierarchies of corruption right down to the hamlet-level. The project moreover exacerbated conflicts between FD officials and local communities. In fact, the SBCP prevented local people from entering the jungle for their livelihoods, and allowed outside encroachers to smuggle forest resources more freely.

The SBCP design and project activities were influenced by the FD's unfounded and prejudiced view of local people as the main threat to the richness of the Sundarbans ecosystem, deliberately obscuring the fact that these very communities have been there for generations and have sustainably used the region's natural resources. Local communities were blamed by the SBCP while the larger encroachers and forest destroyers such as local elites and their henchmen, and operators of tourism and other industries, were left unhindered. The conservation project thus remained market-influenced beyond the needs and purview of its inhabitants.

Most people in local communities in the Sundarbans had never heard of the GEF or ADB. One of their frequent comments was that if the GEF and ADB are funding agencies that support activities to improve the state of the Sundarbans, they should have chosen the implementing and executive agencies in the light of their past records. They should have preferred local people, researchers and professionals to design a project. The local people know that project design is a crucial stage, and that the designers should have a thorough knowledge of the socio-economic and natural environment. Baseline studies, monitoring and evaluation should ensure that the project design is based on the reality on the ground, because once the project has begun it is difficult to revise.

For some people in the case study area, it was only because of the few micro credit programmes run by NGOs, and some limited LGED construction works, that they became aware that the SBCP existed at all. No one in the communities has a

complete understanding of the SBCP's concept, and most report that they know nothing about it. Their principal demand is that their livelihoods are securely protected. 'If you tell me that the SBCP aimed to strengthen the FD for better management, please note that the whole FD is now more corrupt than it ever was', said Mr Ebrahim Sheikh. 'Is that an indication of management?' Yousuf Ali, a bawali of Nilburi, Munshiganj, stated: 'FD officials are the middle men for forest smugglers. They don't care for the felling cycle, breeding seasons for fisheries, golpata growing seasons – absolutely care nothing for the Sundarbans. If SBCP were to protect the forest, why did it not find these culprits who destroy the forest? Why did not it reorganize the FD offices with good officials? Why didn't it monitor and investigate these illegal actors?' The key to their comments is that if the SBCP was implemented for the betterment of the forest, why didn't it investigate the actual reasons for forest destruction? The problem lay in the roots of the design, and thus the project failed. 'You have given money to a man who wants to pocket money: how can you protect the forest?' – such a comment captures well most of the local communities' views.

In the view of local people, the micro-credit programme was unsuccessful due to ineffective planning and poor performance. They could not apply or adapt the alternative livelihood opportunities suggested, such as social forestry, aquaculture, and so on. Aquaculture (shrimp farming), in turn destroyed some of the mangrove and shrank the agricultural land on which local people depend for food all year round. The SBCP failed to deploy people's skills and inventions in promoting income-generating activities; rather it imposed and encouraged activities alien to the local people, and they have proved destructive of the forest.

A large number of project's documents prepared by the ADB and GEF were disclosed neither to the public nor to concerned interest groups. Even researchers had no access to them. Such secrecy gives the impression that the ADB and GEF have hidden intentions beyond their policy statements and stated objectives.

While designing the project, the SBCP failed to incorporate the local communities' and indigenous peoples' traditional knowledge. The project documents made no mention of the use of traditional knowledge for the cause of biodiversity conservation in the Sundarbans.

The project did nothing substantive towards participation or involvement of the local communities, indigenous people or civil society throughout its decision-making processes.



A more important issue in SBCP is accountability and responsibility for the design failure and its incompetent implementation. The project planned to spend the lion's share of its budget on consultancy services: 53 per cent of the total budget on foreign consultants, 11 per cent on local consultants, 6 per cent on international travel and 2 per cent on local travel. These funds were handled directly by the financing agencies. They created, therefore, an influx of foreign and national consultants into the Sundarbans Reserve Forest (SRF) and impact zone, which effectively turned the entire project into one paying only lip service to 'poverty reduction' and 'biodiversity conservation'.

A substantial part of the disbursed money was directly handled by the ADB itself. The technical assistance (TA) input of the SBCP was tendered by the ADB and contracted out to ARCADIS Euroconsult. The GEF disbursed US\$4.04 million directly to the ADB, and this was administered through ARCADIS Euroconsult. The Forest Department – the GoB's implementing agency – had little control over this fund. The funding agencies, therefore, should not blame the FD or the local communities for the project's failure, and should not, therefore, burden the people of Bangladesh with refunding the loan. The funding agencies should waive repayment, as the project's failure was due to its flawed design and subsequent ill-implementation, most of which were handled by themselves. These organizations should also account to local people – compensating local resource users for the restrictions on their resource uses and livelihood sources that the project imposed. The funding agencies directly responsible for the project's planning and execution should not be allowed to escape blame for its poor outcome and desert the Sundarbans.

INTRODUCTION

In the early 1990s, the Government of Bangladesh (GoB) expressed its determination to expand and conserve the country's remaining natural forests. To this end, it proposed to devise a policy and planning framework, including appropriate institutional mechanisms, to promote peoples' involvement in forest management and conservation. In 1991 the GoB launched the Forest Sector Master Plan (FSMP), and in 1994 formulated the National Forest Policy (NFP). The FSMP and NFP together constituted the backbone of the government's strategy of Participatory Forest Management (PFM) in Bangladesh. In the same spirit, the Sundarbans Biodiversity Conservation Project (SBCP) project was undertaken by the GoB, the largest project of its kind, aiming to establish a proper management system for conserving the biological diversity and securing the environmental and biological integrity of the Sundarbans. The project was planned to be carried out in the Sundarban Reserve Forest (SRF) and also in adjacent Sundarban Impact Zone (SIZ) home to 3.5 million people. 'Reduction of poverty' was identified as a strategic development objective of the project. The bulk of the finance for the project came as loans and grants from, respectively, the Asian Development Bank (ADB) and the Global Environment Facility (GEF) (see SBCP profile below).¹

SBCP Profile

Project Name	Sundarbans Biodiversity Conservation Project
Sector	Agriculture & natural resources /environment & biodiversity
Strategic Objectives	Primary: sound management of environment Secondary: poverty reduction
Project Components	Effective organization of Sundarbans Reserve Forest (SRF); biodiversity conservation and sustainable resource management; socio-economic development of the impact zone; ecotourism and environmental awareness; technical advisory group (TAG), monitoring, and research studies; effluent treatment.
Executing Agency	Forest Department, Ministry of Environment and Forest (MoEF)
Finance Mode	Total US\$77.3 million, of which ADB loan US\$33.9 million; GEF grant US\$12.2 million; Neatherlands US\$3.1 million; GoB US\$15.6 million; Palli Karma Sahayak Foundation (PKSF) loans through NGOs US\$6.8 million; NGOs US\$1.9 million; beneficiaries US\$3.8million.



Implementation Contracts The overall project comprised several implementation contracts, including: ADTA (Advisory Technical Assistance), independent biodiversity monitoring and evaluation contract with IUCN; Provision of micro-credit by PKSF; development of water resource modelling by the Surface Water Modeling Center and the Local Government Engineering Department (LGED)-led community development and infrastructure programme within the impact zone.

Box 1: Involvement of ADB and GEF in Biological Conservation in Bangladesh

Bangladesh received a total of US\$40.7 billion from ADB up to 2002-3 for various projects (Annex Table 1).² The extent of GEF activity in Bangladesh is, however, not as great as that of the ADB. In two focal areas out of its three projects in Bangladesh, the GEF had granted US\$25.4 million. Of these three projects, two were under the 'biodiversity focal area', worth US\$13.2 million. Both projects were approved in 1999. The other project was implemented under the 'climate change focal area' (see Annex Table 2). The ADB started to coordinate closely with the World Bank (WB) in Bangladesh's forestry sector loans in the 1980s. The WB also funded the Forest Resource Management Plan (FRMP) while the United Nations Development Programme (UNDP) and the UN Food and Agriculture Organization (FAO) provided technical assistance to the forestry sector over the last two decades. In fact, the WB, through its partners and associates, has supported forestry sector projects in Bangladesh since the 1980s, such as in joint forest management, capacity building and training of forest personnel, research and development of forestry institutions, livelihood enhancement through forestry projects, creation of carbon sinks, commercial plantations for forest regeneration, and transfer of technology and information on forestry and biodiversity conservation. However, especially in the biodiversity focal sector, WB's money came through GEF on 1 March 1998 (council approval on 1 October 1999)³ for the SBCPin association with an ADB loan and a grant from the Government of the Netherlands.

The SBCP was planned to run for seven years (1999–2006).⁴ However, the project was formally inaugurated in March 2000 and officially cancelled in January 2005.⁵ The ADB first suspended the borrower's (GoB) right on 4 September 2003, and stipulated three conditions for lifting the suspension, namely: (1) revision of the project design according to a plan acceptable to the ADB; (2) reconciliation of the project's accounts in compliance with ADB's financial management guidelines; (3) meeting the crucial terms of loan covenants of the project.⁶ The ADB review mission visited Bangladesh in October 2004 and expressed their views on the SBCP as follows: (a) the project lacked the overall responsibility of the GoB; (b) low priority was given to financial management of the project; and (c) in the terms of the GoB and ADB agreements, the Sundarban Management Wing was dysfunctional during the mid-term review of the project. The mission found 'significant divergence of views between the Chief Conservator of Forests (CCF) and the Forest Department (FD)'.⁷ The mission expressed its dissatisfaction, as the ADB 'must not tread on the dubious grounds of seeking consensus between the field and headquarters'.⁸ The mission at that point agreed not to discontinue funding since they were of the view that until then the GoB had made quite extensive efforts to revise the project. The mission further ascertained that the ADB should explore vigorously for a more acceptable mechanism of project implementation. The mission, finally, found the SBCP to be running without any accounting mechanism, and that any claim for the existence of such accountability in that office would be a 'travesty of truth'.⁹ The ADB noticed, moreover, that the frequent changes of Secretary of State in charge of the Ministry of Forestry contributed to its poor performance. The ADB, thereafter, cancelled the loan (notified by a letter to the Ministry of Finance on 13 January 2005) and reallocated the remaining funds to another project (emergency flood damage rehabilitation) in accordance with a request from the GoB¹⁰.

However, the SBCP is not the first ADB-funded project to have encountered problems in this country. Projects financed and implemented by the ADB in Bangladesh have been highly criticized for their policies and mechanisms of implementation. The ADB has been accused of failing to be transparent and of disregarding the projects' original intentions. In consequence, such schemes as the Khulna-Jessore Drainage Rehabilitation Project (KJDRP) and the Modhupur National Park Development Project (MNPDP), (popularly known as Modhupur Eco-Park) were put in jeopardy owing to public grievance. The Bangladesh



Civil Society Working Group (BCSWG) criticised 'the Manila-based lending institution' for having 'systematically spawned and promoted poverty through its so-called development policies'. Criticism of the SBCP had been voiced by the SBCP Watch Group, an initiative of individuals and peoples' organizations inhabiting the impact zone of the Sundarbans, which asked for an effective redesign of the SBCP in line with local peoples' concerns.¹¹ This group warned as long ago as 1997 that the project would fail if it were not seriously reconsidered.

Civil society groups feared that the project was ill-designed, whereas the SBCP's official statements claimed that the project failed owing to its implementation process. The ADB said that the project encountered difficulties with the design and financial management throughout its execution. By the end of December 2004, despite nearly three quarters of the loan period having elapsed, only one quarter of the funds had been disbursed and about one quarter of the project implemented.¹²

In this context, the remit of the study is to undertake a brief review of the GEF/ADB portfolio in Bangladesh and to examine critically the impacts of GEF's biodiversity related projects, with particular focus on the SBCP, on indigenous (e.g. Munda) and local communities (e.g. Mouals, Bawalis, Golpata collectors, fishers). We review the causes of failure of the project from the point of view of affected communities and people's experiences. We also seek to assess the success, if any, of the project's endeavours to reduce poverty while conserving the forest.

POLICY COMPLIANCE AND PROJECT IMPLEMENTATION RECORD

Adherence to GEF Policies

Public involvement and stakeholder participation

The GEF documents defined 'stakeholder participation' as 'where stakeholders collaboratively engage in the identification of project concepts and objectives, selection of sites, design and implementation of activities, and monitoring and evaluation of projects.'¹³ The project's 'Inception Report'¹⁴ clearly stated that the terms 'participation' and 'participatory management' were 'confusing' and resulted in many divergent perceptions operating in the phase of project planning and implementation.

Most local people consulted in the study (see Annex 3) acknowledged that they first heard of SBCP from our researchers. The few who had heard previously about the SBCP were not informed of the project's rationale, and remained uncertain of the benefits of the project, which were meant for them. Those who knew about the project typically said: 'some people from FD came to us once and asked why we use the forest. They actually tried to accuse us of destroying the forest. They told us that we are illiterate and inconsiderate to the forest resources, and thus we are over-exploiting the forest.' No one could remember any public hearing or public discussion about the SBCP within their areas. Taking the GEF's definition of public involvement (see Box-2) as a benchmark, it can be argued that dissemination of information and meaningful consultation with stakeholders were not properly carried out during the project preparation phase.

Box 2: The GEF Definition of Public Involvement and Stakeholder Participation

Public involvement consists of three related, and often overlapping, processes: information dissemination, consultation, and 'stakeholder' participation. Stakeholders are the individuals, groups, or institutions that have an interest or stake in the outcome of a GEF-financed project. The term also applies to those potentially affected by a project. Stakeholders include recipient country governments, implementing agencies, project executing agencies, groups contracted to conduct project activities at various stages of the project, and other groups in civil society, which may have an interest in the project.

The GEF public involvement guideline stresses the need to assess the effectiveness of public involvement in the design and execution of the project; to monitor subsequent public involvement through the annual project implementation review; and to evaluate the impact of public involvement on the project's



progress. While using the terms 'participation' and 'participatory management', the inception report remained confused. In addition, the communities, who were termed the 'beneficiaries' of the project, were not effectively consulted by the implementing agencies. Information from the field suggests that either the GEF failed to implement its own guidelines on public involvement or the FD intentionally overlooked its responsibility to undertake meaningful public consultation. These problems in ensuring adequate local participation in conformity with GEF policies were implied in the inception report, which had noted that the project's 'plan and strategies' had failed to define 'peoples participation' properly.

Project cycle

The GEF project review criteria are guided by 10 operational principles, including the following four, which the SBCP failed to implement: (i) the need to ensure consistency of GEF activities with relevant international conventions; (ii) full disclosure of non-confidential information; (iii) public involvement (including indigenous and local communities); (iv) regular monitoring and evaluation.¹⁵ The Convention on Biological Diversity (CBD), ratified by the GoB, carries several requirements relating to customary use of biological resources and traditional knowledge; despite being highly relevant to GEF activities in the Sundarbans, these were seemingly disregarded by the project. According to local communities, SBCP documents remained more or less invisible to them. Even after the suspension of the project, many documents relating to the SBCP (for example, the audit report) remain highly confidential, inaccessible, or difficult to obtain from the executing agency (the FD).

Operational programmes

Addressing forest ecosystems, Operational Program Number 3 (OP-3) of the GEF asserts its objective as **conservation** and **sustainable use** of forests. To achieve these objectives, the OP-3 stipulates some monitorable activities, such as: (i) establishment of **protected areas** within forests; (ii) **removal of specific threats** to biodiversity; (iii) **integration** of biodiversity protection with the production sector; (iv) **sustainable use** of forest industries (for instance, logging); and (v) **institutional strengthening**.¹⁶ Local communities and experts accused the SBCP of failing to carry out the second, third and fourth of these. Concerning the fifth activity, according to officials, the SBCP weakened the FD's institutional strength in the Sundarbans by dividing it into two parts (Sundarbans East and Sundarbans West): it now requires more manpower and money to operate.¹⁷

Operational strategy

According to strategic considerations of the GEF, programmes/projects will be country driven, and will be linked to national sustainable development endeavours. Public consultation and effective involvement of local communities and other stakeholders will enhance the quality, impact, relevance, and national ownership of GEF activities.¹⁸ The policy also supports 'public participation and consultation with major groups, local communities and other stakeholders at appropriate stages of project development and implementation.'¹⁹ The GEF defines 'public involvement' and 'stakeholder participation' (see Box 1) in its public involvement guidelines. Information from the region where the SBCP was implemented suggests that local communities were almost completely in the dark regarding the objectives and development of the project. GEF's operational strategy emphasized 'creating participatory schemes for resource management, including that of buffer zones, by local communities, indigenous groups, and other sectors of society, consistent with biodiversity conservation and sustainable use',²⁰ but these were found largely or entirely absent in the SBCP project area (see chapter three). It is clear, therefore, that although the project design and preparation did not properly comply with existing policies, it was nevertheless approved by both the GEF and the ADB, which puts a question mark over both the due diligence of these financing agencies and their commitment to implementing their existing policies effectively and applying their own project approval criteria.

Treatment of ADB Policies

Information policy

In its Information Policy and Strategy (1994), the ADB announced that the Bank would 'operate as an open, accessible institution' and would 'disclose information except when it might be perceived to affect adversely the interests of its member countries or the sponsors of its private sector projects'.²¹ Some important project documents, however, remained inaccessible or unavailable from the Bank itself. In its Confidentiality and Disclosure of Information Policy, the bank affirms 'openness and accountability' in its operation as 'essential for its effectiveness' and accentuates 'disclosure of information' 'on policies and operations' towards encouraging debate and dialogue.²² But several key documents of the SBCP (for example, fact finding and audit reports) have never been placed in the public domain. Moreover, the documents that were disclosed to the public were never translated into Bangla (the state language of Bangladesh). All these documents, therefore, still remain inaccessible to the common people and the beneficiaries alike. The question therefore arises: Are there some facts about the SBCP that might 'affect adversely' the Bank's interests? Is this the reason why the



ADB restricts the disclosure of SBCP information? By its own assertion, the Bank, 'as a public institution', 'is accountable to its shareholders' and to 'others providing support to this institution'.²³ Yet it is not clear whether the Bank is truly accountable to the communities who are supposed to be the 'beneficiaries', who would in the end be liable for paying back the (ADB) loan!

Forest policy

The ADB forest policy document of 1995 asserts that the forests 'are occupied by forest-dwelling communities as well as by recent forest-dependent encroachers from around the forests. Any future forest development strategy must recognize and duly support the identity, culture, and rights of all such communities, including the constructive involvement of the recent encroachers, enabling them to have an economic stake in forests through land tenure arrangements that serve as an incentive for using and managing them sustainably.'²⁴ In dealing with 'ownership', the Bank pronounces, 'it is critical that the government as well as the intended beneficiaries "own" the project concept, objectives, and approaches. This implies their active involvement in the preparation of the feasibility study, and continuing consultation by the Bank with acknowledged stakeholders including NGOs in appropriate circumstances at each stage of project preparation to ensure agreement, support, and ownership.' In reality, the project was designed and its implementation phase begun with little or no concern for local community 'rights', 'culture' and 'identities'.

Box 3: Forest rules in Bangladesh

The rules framed under the Forest Act, 1927 remain operational, since no new rules followed the Forest (Amendment) Act, 2000 which modified the 1927 Act. The rules deal with public transit within various forests (for example, the Sylhet Forest Transit Rules, 1951). Such rules regulate the movement of forest products irrespective of their origin. The movement of timber or other forest products collected or harvested from private land also comes under their purview. The point of the transit rules with respect to forest produce collected from privately owned land is to obtain a charge-free certificate from the Forestry Department regarding private ownership. However, the details for the collection and sale of forest products from privately owned areas are sometimes prohibitive.

The existing rules do not accommodate participatory forestry activities. The Forest Department continues to manage forestland according to conventional forestry management concepts, which do not conceive of or allow community participation. Forestry practices also remain contradictory as the Forest Department is raising new plantations, mostly on denuded tracts of land under its control, while many areas of existing forest are not only being gradually depleted, but in many locations are being converted to other uses.

Moreover, Bangladesh's existing National Forest Policy, 1994 and the Forest Act, 1927 (see boxes 3 and 4) do not necessarily accommodate participatory management in forests, and the project documents did not explicitly address how the proposed 'participatory forest management' and 'peoples involvement' (in accordance with ADB and GEF policies) would be achieved within the national institutional and legal framework.

Box 4: Evolution of the Forest Acts in Bangladesh

The Forest Act, 1865, the first of its kind in pre-partition India, was based on the rules proposed by the Chief Commissioner of Burma (now Myanmar). In 1878 the Act was modified in line with other legislation. The 1865 Act was replaced by the Forest Act, 1927. This Act has remained operational through several modifications, the last being the Forest (Amendment) Act, 2000.

The Bengal Private Forest Act, 1945, and the Private Forest Ordinance, 1959 regulated forest management on privately owned land. Private forests had no official management at that time. The only practice was to harvest wood or to clear the forest for conversion to agriculture. The management of privately owned forests was taken over by the government under the provisions of the Private Forest Act and Private Forest Ordinance.

In 1959, the State Acquisition Tenancy Act aimed to eliminate landlords' control over tenants, and bring them under direct control of the government. Under the provisions of this law, much private forest land was declared non-retainable, acquired by the government, and brought under the management of the Forest Department as Reserved Forest under an order passed by the Board of Revenue.

In 1989, the Forest Act was amended to strengthen forest conservation through providing stiffer penalties for offenders and restricting the discretionary powers of forest officials and local magistrates. The revised Act relies chiefly on conventional centralized forest protection mechanisms rather than community forest management. The Forest (Amendment) Act, 2000 incorporates social forestry, through which communities are declared responsible for forest management and entitled to benefit from selling wood or other forest products.

Indigenous peoples policy

The ADB indigenous peoples policy adopted in 1998 states: *'indigenous peoples often are not able to participate equally in development processes and share in the benefits of development, and often are not adequately represented in national social, economic, and political processes that direct development. While constituting a relatively small part of the population of the Bank's region, indigenous peoples and their potential vulnerability must be regarded as significant in the Bank's development efforts and interventions...'*

Nevertheless, the SBCP project documents accused traditional resource users which include local communities e.g. bawali, Maul, fishermen, and indigenous people (Munda)²⁵ of destroying the forest instead of valuing their traditional knowledge, skills, and customary resource uses. Despite the



ADB's policy of extending its support for the efforts of the GoB and other project sponsors in the cause of indigenous people, it was totally ignored throughout the project. As for public understanding of the project, this study reveals that both the sponsor (here the ADB) and the implementing agency (the FD, on behalf of the GoB) failed to respect the Bank's own policy. Some elements recognized by the Bank as key to devising an appropriate development plan for indigenous people were also ignored. For example:

'...during project design of a development plan that takes into full account the desires and preferred options of indigenous peoples affected by the project; (ii) studies to identify potential adverse effects on indigenous peoples to be induced by the project, and to identify measures to avoid, mitigate, or compensate for these adverse effects; . . .'

The desires and preferred options of traditional resource users including the indigenous peoples affected by the project were not evident in the SBCP outline.

Gender policy and development

ADB policies affirm the Bank's intention to 'facilitate gender analysis of proposed projects, including program and sector loans, and ensure that gender issues are considered at all the appropriate stages of the project cycle, including identification, preparation, appraisal, implementation, and evaluation'.²⁶ Even though women are most vulnerable in the remote areas of the SRF, the project documents do not explicitly recognise women's needs, priorities and choices. It is clear, moreover, that the Bank did not take adequate measures towards prioritizing women's issues within its design and implementation of the SBCP.

Environment policy

The ADB's loans are classified into category A (with potentially significant environmental impacts); category B (with potentially less significant environmental impacts); category C (unlikely to have significant environmental impacts).²⁷ It is interesting to note that its loan for SBCP was classified in category B, which means it expected 'potentially less significant environmental impacts' on the Sundarbans. Mangroves everywhere are known to be one of the most productive but vulnerable ecosystems in the world.²⁸ Like the rest of the world's mangroves, the Sundarbans are also critically vulnerable for their geo-hydrophysical location and over-exploitation. The activities anticipated by the project, such as increased eco-tourism, promotion of aquaculture (including shrimp farming), and the building of physical structures within the forest area, are destructive to mangroves, as has been seen in Thailand and Vietnam (WRM, 2003). Considering the uncertainty involved, the project should have been classified in category A.

While preparing the project, the ADB conducted an environmental assessment. A summary of the initial environmental examination (SIEE) was placed before the Board on 1 June 1998. Project-related environmental impacts were judged to be predominantly positive, with no major adverse effects. The SIEE indicated that only a small number of proposed activities could potentially cause environmental harm. It was thus considered that the environmental benefits would outweigh any adverse impacts after mitigation measures had been taken. The SIEE report recognized, for example, a medium risk of the misuse of micro-credits to establish undesirable shrimp ponds. To avert the risk, the report, suggested rehabilitating some existing, unproductive ponds.

But it should be noted that the expansion of shrimp aquaculture has been recognized during the past two decades, in many regions of the world, as one of the most destructive human activities in mangrove forests. This has been seen in Ecuador, Honduras, Vietnam, Malaysia, Thailand and in the Chokoria Sundarbans of Bangladesh.²⁹ Despite this, the SBCP operated micro-credit programmes to encourage shrimp farming within the SRF zone. Nets to catch shrimp larvae in the Sundarbans also catch up to 300 other species, which are then discarded, thus causing severe loss of aquatic biodiversity. Considering public opinion and the overall consequences, the concept of a 'net environmental benefit' which 'would outweigh any adverse impacts after mitigation measures had been taken', as envisaged by the SIEE report, appears unrealistic.

In accordance with its environment policy, an ADB environmental assessment process begins with the identification of potential projects and verification of project components, whether financed by the ADB exclusively or with co-financiers. The borrower is responsible for carrying out the environmental assessment in conformity with the ADB's environmental assessment requirements. The borrower is also responsible for implementing the recommendations of the environmental assessment.³⁰ Having studied the available official information, we are convinced that the GoB, the borrower in the case of the SBCP, did not submit an 'Environmental Assessment Report'. The Bank further delineates, 'The integration of environmental considerations in Country Strategy Papers (CSPs) will be measured by the extent to which they can identify critical environmental issues facing development and poverty reduction in the country, and to provide credible lending and non-lending responses to these issues.'³¹ Paradoxically the most common



criticism of the SBCP by the local people was about the project design, which almost completely failed to identify the key issues affecting the Sundarbans – the decrease of freshwater flow in the south-west coast, top dying of sundari species, and increasing trend of siltation.

Anticorruption Policy

The ADB defines corruption as, ‘the abuse of public or private office for personal gain’.³² The ADB suggests, therefore, that the design of individual projects must pay careful attention to the risk of fraud or corruption within the project, and that projects should be designed to elicit good public sector management.³³ Given the infamous image of the FD as a corrupt institution, the project design would have been expected to build anticorruption measures or safeguards into its inception phase. However, the inception report is silent about anticorruption measures or management. The ADB first suspended the project in September 2003 and finally cancelled it in January 2005, accusing the FD of impeding implementation of the project. Citizens’ organizations such as the SBCP Watch Group³⁴ and Bangladesh Civil Society Working Group (BCSWG) criticized the project for being plagued by the corruption of the FD and other parties. It is not publicly known, however, whether any investigations into corruption were ever carried out as part of ADB or GEF evaluations. Significantly, the ADB’s general policy of ‘not disclosing any anticorruption reports to any external parties’ prevents exposure of corruption in this project (see Box 5). The ADB’s contradictory disclosure policies, therefore, may have helped to cover up any corruption in the SBCP and restricted further public scrutiny and debate on this issue.

Box 5: Treatment of Fraud and Corruption Issues in ADB Reports and the Release of ADB Documents

When there is compelling evidence that corrupt activities have hampered the effectiveness of ADB projects or lowered their rate of return, this evidence should be explicitly noted in ADB documentation, including various reports on project supervision, completion, evaluation, performance audit and any other relevant documents so that appropriate remedial actions can be considered. Management and staff should use plain language in the reports, and avoid opaque or euphemistic terms that may obscure the nature of the problem. As a matter of general policy, ADB will not release any information pertaining to a specific fraud and corruption-related investigation to external parties. Subject to the ADB Charter, the Oversight Committee may, however, consider potential exceptions to this policy, such as the need to refer a particular case to national authorities for criminal investigation and prosecution.

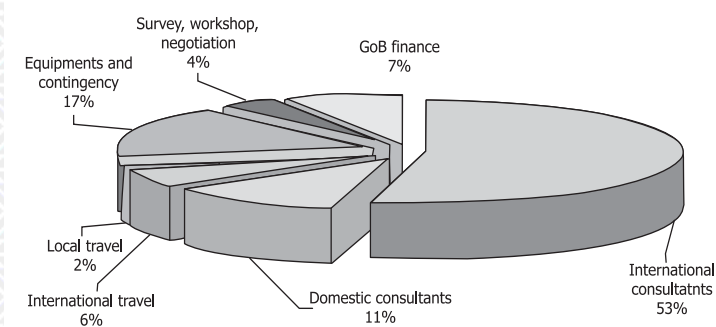
(ADB Audit Manual, Chapter 800: Anticorruption)

Financial Records of the SBCP

Planned Expenditure

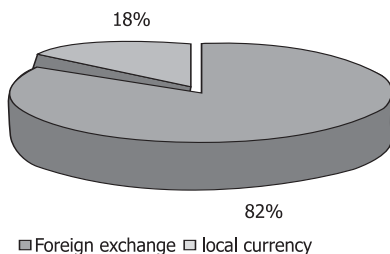
The total budget of the SBCP was US\$77.3 million. Of this, US\$34.9 million came from the ADB as a loan, US\$12.2 million came from the GEF via the ADB, and US\$3.5 million came from the Dutch government. The GoB put in US\$15.6 million, and the rest came from different NGOs and the PKSF loans.

Graph 1 : Finance Plan for the SBCP as per TA Report (in percent)

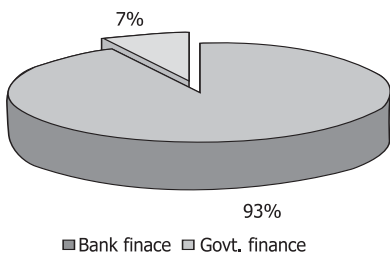


The ADB's technical assistance report reveals that the SBCP was designed to spend about 53 per cent of its total budget on foreign consultancy services and 11 per cent on local consultants. A further 6 per cent and 2 per cent was earmarked for international and local travel, respectively. So 72 per cent of the total budget was to be spent on consultancy services (Graph 1). As illustrated in TA report, it is evident that 82 percent finance is in foreign currency and 93 percent is bank's finance (Graphs 2 and 3)³⁵.

Graph 2: ADB's finance plan of expenses on SBCP as per TA report



Graph 3: Finance mode of the SBCP as per TA report



Actual Expenditure

According to the ADB review mission report, US\$8.8 million out of a US\$34.9 million ADB loan had been disbursed up to 30 September 2004. The Netherlands government had co-financed the project to the tune of US\$3.5 million, of which US\$0.7 million had been disbursed during the same period. The GEF co-financed the project with a grant of US\$12.2 million, of which US\$4 million had been disbursed. A summary of these expenditures is presented in Tables 1, 2 and 3.

Table 1: Summary of the ADB Loan Utilisation (US\$ million)

	ADB Total	ARCADIS Contract	NGO Contract	FAO Contract
Total Allocation	34.9	3.2	1.5	0.7
Disbursed (30/9/2004)	8.8	1.6	0.7	0.26
Percentage disbursed	25%	50%	44%	37%

Table 2: Summary of the GEF Loan Expenditure (US\$ million)

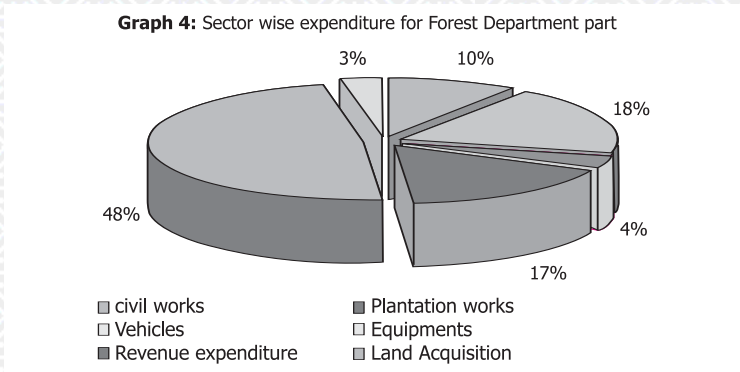
	GEF Total	TAG Contract	IWM Contract	IUCN Contract
Total Allocation	12.2	9.0	1.5	0.7
Disbursed (30/9/2004)	4.04	3.08	0.7	0.26
Percentage disbursed	33%	34%	44%	37%

Table 3: Summary of Incurred Expenditure by the Dutch Fund (US\$ million)

Netherlands Government	Total
Total Allocation	3.5
Disbursed (30/9/2004)	0.68
Percentage disbursed	19.4%

The deadline for the project's completion was 31 December 2006. The ADB, however, suspended the loan on 4 September 2003. On 16 February 2006 Mr Byung Wook Park, Assistant Controller, Loan Administration Division of ADB, requested the Secretary of the Economic Relations Division (ERD) of the GoB, to refund the initial advance of US\$1.42 million. To scrutinize the ADB claim, the MoEF formed a five-member committee headed by Md Anwar Hossain, Assistant Chief Conservator of Forest (Development Planning) through Memo No. MoEF/E-4/06 (Part-2)/104, dated 10 April 2006. The Committee submitted its report to the MoEF on 23 April 2006. The report delineated that the ADB provided US\$1.5 million as an initial advance, of which the FD had already spent US\$1.063 million; the ADB should therefore claim only US\$0.437 million instead of US\$1.42 million. The issue remained unresolved. While examining the financial management of the FD, the internationally reputed, ADB - appointed firm of chartered accountants, A. Kashem and Co., could find no major irregularities.³⁶

According to the Anwar Hossain Committee Report, the FD for its part spent Tk533.74 million (about US\$9.7 million). Forty-eight per cent of the money of the FD part was spent on civil works (Graph 4).



According to the ADB Review Mission Report, US\$2.27 million was spent on foreign consultancy, which was 61.7 percent of the total spent (USD3.67 million) by agencies other than the FD (Table 4 and Graph 5). Despite the fact that agencies other than FD spent most of the money on consultants, their outcome remained highly unsatisfactory. Even the ADB itself blacklisted the ARCADIS Euroconsult for their poor performance.

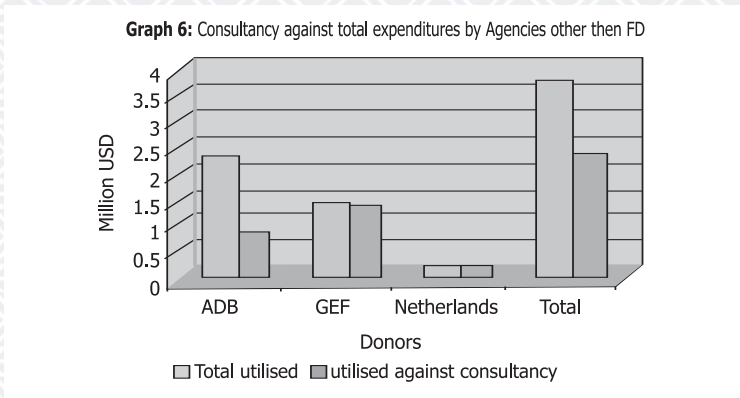


Table 4: Summary of the Expenditure on Consultancy (US\$ million)

	Total Disbursed	Budgeted for Consultancy	Total spent by Agencies other then FD	Spent on Consultancy
ADB	8.80	1.60	2.20	0.80
GEF	4.04	4.04	1.33	1.33
Netherlands	0.68	0.68	0.13	0.13
Total	13.52	6.32	3.67	2.27

The TA input of the SBCP under project contract no. TA 3158/BAN (GEF) was tendered by the ADB and contracted out to ARCADIS Euroconsult. The GEF provided US\$4.04 million directly to the ADB, and this was administered through ARCADIS



Euroconsult. So the FD, Bangladesh's implementing agency, had no control over the use of this fund.³⁷ Taking this into consideration, the ADB has no ground to shift the burden of the debt on to the people of Bangladesh.

Moreover, up to this date, taking into consideration the information publicly available makes it very difficult to ascertain how much and in what ways the money was spent in implementation of the project. Neither the FD nor the ADB or GEF has released any document regarding this issue or disclosed any project status report to the public. The FD has its own explanations and views about why the SBCP project failed. According to the top FD officials involved in the SBCP, it was the funding agencies' attitude that brought about complete failure. Considerable funds were spent on consultants and the money was directly handled by the financing agencies. The project created an influx of foreign and national consultants in the SRF and SIZ, which effectively turned the 'biodiversity conservation' project into a consultancy project. In this way, the SBCP from the outset departed from its publicly stated goals of participatory conservation and development.

INDIGENOUS AND LOCAL COMMUNITIES' EXPERIENCES OF SBCP IMPLEMENTATION

Project Implementation Experiences

This section of the report examines the impacts of SBCP at two sites, Noai (Paikgacha) and Mushiganj (Shayam Nagar), covering 20 villages. These impacts were identified from in-depth interviews and focus group discussions (FGDs) with the local communities who were expected to be the beneficiaries of the project. The discussion below is based on local and indigenous peoples' comments and views and on professional and other working groups either involved or interested in the SBCP (for a methodological note, see Annex 3). The section also identifies what changes have come about in the lives and livelihoods of local people after implementation of such a large conservation and development project.

Environment

People living in Noai (a remote part of Paikgacha, comprising 12 villages) have inhabited the Sundarban impact zone for generations and they perceive themselves to be part of the forest. They do not explicitly talk about their role as environmental and natural resource caretakers, but they do understand their responsibility towards the forest. Their livelihoods depend on the forest directly or indirectly, for fuelwood, fish, honey and wax collection, golpata collection, and other forest products. Living around the forest generation after generation, they know how to

Status of forest resources	
Indicator	Status
Timber tree	Declining
Matured tree	Declining
Jungle buse	Increasing
Availability of fish	Declining
Agriculture Production	Declining
Honey	Declining
Golpata	Declining
Other forest resources (e.g., Herbal medicine, fruits etc)	Declining

extract forest produce in a sustainable way that leaves resources in a good state for the next generation. Most people living in the forest who were interviewed as

part of this study did not know much about the SBCP. Only a few people, who had some contact with the FD or local activists groups, were found to have some knowledge of the SBCP. As many local communities do not know when the project began or ended, it is not possible for them to perceive the status of the forest before and after implementation. Local people do report, however, that 'the jungle has been declining day by day for the last two decades'. Their indicators of forest decline are presented in Box above.



The SBCP design and project activities were influenced by the Forest Department's unfounded and prejudiced view that the local human inhabitants are the main threat to the richness of the Sundarbans ecosystem, deliberately ignoring the fact that these same communities have been there for generations and have sustainably used natural resources in the region. It is a fact that people have been exploiting nature for their livelihoods, but the fact also remains that unless there is careful use and recycling nothing is sustainable, and this sustainability concept has been part of the rural culture for generations. A symbiosis exists between indigenous cultural communities and their environment. Yet somehow the SBCP seemed to overlook this fundamental aspect of sustainable human interaction with ecosystems, habitats and biodiversity. This is a key reason why the project failed to have any positive impact in the forest.

Socio-economic status and livelihood

As one of the project's strategic objectives was 'poverty reduction', peoples' livelihoods and socio-economic status before and after implementation should tell us something about its effectiveness. We investigated the socio-economic status of people in these communities, who were expected to achieve some betterment in their lives, before and after the project.

Box 6: SBCP as seen by local people

'If you ask for 1,000 maunds [a local measure of weight, approximately 38 kg] of wood now sitting here, you can get it within 2 or 3 hours. You just have to pay someone from the adjacent forest office. The Forest Department is the authority responsible for protecting the forest from destruction, and this is what they do! They are highly literate people, and that's their sense of environment. The point about the forest environment is to keep it intact, extracting resources so that they are available for the next generation. We forest people do not extract forest resources beyond our need, and we do not exhaust it. Forest people have needs and they depend on the forest for livelihood. That's why they care for the forest while extracting the resources. But outside businessmen and powerful people living in city don't care about the forest. All they care about is making money. They have links with foresters; they don't care about the law. Often large steel-hulled trawlers come from Khulna and adjacent cities and cut down trees up to the maximum permitted limit. When local people cut down trees they look for only mature or old trees. But these outside people do not leave even the young or flowering trees. Forest people are often used as laborers in this process. As people are poor, they often have to do this, even against their will. I don't know when and how the SBCP was implemented and for what purpose, but be sure that I haven't seen any change of the present scenario for the last decade.'

Tapos Mondal, a teacher in the local primary school at Durgapur, explaining the degradation of the forest environment. Everybody present at the meeting nodded in agreement as he spoke.

People from the two study areas commented that their income has been shrinking day by day because of forest destruction and several other adverse socio-economic practices like FD harassment, large scale shrimp farms, agricultural land encroachment, and crop failure. From FGDs with the local communities, it has been found that most of the families living around the Sundarbans have very low to low incomes, generally around Tk 1,000-2,500 (around 14-35 USD) per month. According to the indigenous and local communities, the main indicator of their declining livelihood security is the growing number of local people who are now engaged as daily labourers rather than in fishing, agriculture or small-scale forest extraction. This is because 'land is encroached by socially privileged men from the adjacent big cities. Local people face constant harassment by the FD when they enter the jungle for livelihood purposes – even while carrying FD passes', explained Dipak Munda from the Munda indigenous people in Munshiganj.

Local people are barred from the forest without passes. They alleged that FD officials force them to pay double the price for a pass or they do not give passes. Most of the time, officials seize resources that have been extracted and file cases against traditional and local resource users if they fail to offer them bribes. Gazi (not his real name) of Paikgacha has already faced 17 cases filed by the FD. He claims that in 15 cases he failed to offer any bribe, and therefore he is living under continual harassment. *'I do not know what your SBCP has done, but believe me if you do not move these FD officials out of the department no project can do anything good about the Sundarbans'*, he said.



one of the restricted entrances of SRF



Nypa leaves - restricted forest products

Local communities in Paikgacha did not see any SBCP NGO working with them on anything. They do not know about the micro-credit programme that was supposed to be available in the area. Some people in the communities of Munshiganj, however, do know about the micro-credit programs run by certain NGOs. But they couldn't recall their names and don't know if these



programmes were run under the SBCP project or not. Gajanan Biswas of Nilburi village in Munshiganj said that he received credit of about Tk 2,000 from an NGO, which so far he has not repaid. Some people living in Munshiganj report that they did receive loans from NGOs, but they don't know if these loans were in any way related to SBCP.

Box 7: Sustainability - the people's perspective

Azizi Dhali and the jungle are two parts of the same soul. He walks hundreds of miles all year round through deep jungle, and knows everything that lives and grows there. He has never heard of the SBCP.

'This is the first time I am hearing from you! Forest cannot be conserved by big projects or so much money. You just need to be honest and love the jungle. There is a rotation cycle for extracting resources from the jungle. If you know a jungle very well, you know when trees grow, when they bear flower, when they die, how they regenerate - so you can easily pick the right tree or golpata to cut down. If FD officials were honest there would not be any haphazard and damaging use of the forest, as is happening right now. If the government can pressurize the FD to be strict in the implementation of laws and punish dishonest officers and powerful leaders and businessmen living in the cities linked with them, we do not need any project to keep our jungle alive.'

Aziz Dhali
Shayam Nagar, Satkhira

One interesting point about the SBCP plan for forest management and poverty reduction was highlighted by Sukumar Biswas (Koyra, Khulna). According to him:

'if the Government would stop leasing land inside the Sundarbans and adjacent areas, mainly for shrimp cultivation, we would benefit. Because then we could expand agriculture or even community-based small-scale shrimp culture.'

Bijoy Mondal, a villager of Nilburi, Munshiganj, said, *'In Shayamnagar now, many people are making jelly and sauce from Keora (the local name of a mangrove tree species) and processing honey, which earns them good money. If anybody taught us such techniques earlier we would not have to depend on the forest so much.'*

The point here is that even though some innovation in traditional practices helps to sustain and

Indicator	Status
Annual Income	Decreased
Occupation switching	Restricted
Debt	Increased
Entrance to forest	Restricted
Poultry and cattle	Declined
Security	Decreased
Expenditure	Increased

improve local livelihoods, the SBCP could not provide this dependability to the locals, because it contributed to strangle their livelihoods by limiting entry to the forest. The findings from interviews and FGDs on livelihood status before and after implementation of the SBCP are presented in the box to the left.

The word 'accountability' is quite unknown to most people living around the Sundarbans. A common view is that 'government is the all in all, and good things must happen through them.' Local people believe that the FD is a part of the government and is an authority to implement law, so how could they (local communities) hold them to account? When they discussed the ADB loan and the GEF grant for the SBCP, they expressed their view as follows:

'Who is accountable to whom? FD is a part of government. So it is accountable to government. Government is accountable to ADB because they got the loan from this bank. ADB is not accountable to us because it lent money, so why should we contribute to the repayment of a bad loan of the government?'

Many people are in favor of punishing the FD officials. Many said that people who took money in the project should repay the loan. Others say the government should arrange a public 'vote' before starting internationally financed projects. Karim Sheikh, a local school teacher, said:

'This is such a bad loan that you can accuse everyone and noone at the same time. The irony is that the so-called experts consumed most of the money in the project, but we all have to pay for this. When we plan such big projects, our government should be more careful at every step how to spend money.'

SBCP Impact

People local to the SBCP sites are mostly in the dark about how the SBCP project was formulated, implemented and managed. Many say that nobody had talked to them before about SBCP. Some people reported that a few FD officials came to them, blamed and questioned them about their entry into the forest and resource collection.

'Do you think that we forest people steal wood from the forest? Maybe some of us "steal" because the FD officials do not provide permits to enter the forest without taking bribes. But they do not file cases against the big trawlers that come from the cities and cut down all the trees, whether mature or not. These destructive people don't face the courts, because they have money and links with the FD officials.'



Table 5: Traditional Resource Users Perceptions on Recent Changes in Livelihood, Environment and Ecology

Component	SBCP component	Cause	Status
Livelihood			
Income	A and C	<input type="checkbox"/> Forest entrance restricted <input type="checkbox"/> FD harassment <input type="checkbox"/> Agricultural land reduced <input type="checkbox"/> Production reduced <input type="checkbox"/> Security low	<<
Expenditure	A and C	<input type="checkbox"/> Bribes to FD officials to enter forest <input type="checkbox"/> Facing court cases filed by FD <input type="checkbox"/> Snatches by jungle robbers	>>>
Job Security	A and C	<input type="checkbox"/> Jungle robbers <input type="checkbox"/> Forest resources declined <input type="checkbox"/> Income low from current jobs <input type="checkbox"/> Harassment by FD officials	<<<
Job switching	A and C	<input type="checkbox"/> Forest resources declined <input type="checkbox"/> Income low from current jobs <input type="checkbox"/> Harassment by FD officials <input type="checkbox"/> Low agricultural production <input type="checkbox"/> Land encroachment by musclemen	>>
Job opportunity	A and C	<input type="checkbox"/> Low agricultural production <input type="checkbox"/> Land encroachment by musclemen <input type="checkbox"/> Forest resources declined <input type="checkbox"/> Increased harassment by FD officials <input type="checkbox"/> Harassment by robbers	<<<
Social security	A and C	<input type="checkbox"/> Harassment by robbers <input type="checkbox"/> Harassment by outside musclemen <input type="checkbox"/> Low income <input type="checkbox"/> Seasonal unemployment	<<<
Education	C	<input type="checkbox"/> Low income <input type="checkbox"/> Low security <input type="checkbox"/> Lack of educational structures <input type="checkbox"/> Reduction of earning members	-
Environmental Knowledge	D	<input type="checkbox"/> No awareness programme <input type="checkbox"/> No education in school <input type="checkbox"/> No activity from forest department	-
Poultry and cattle	C	<input type="checkbox"/> Reduced agricultural production	<
Environment			
Floral resources	A and C	<input type="checkbox"/> Stealing by outside musclemen <input type="checkbox"/> Linkage with Corrupt FD officials	<<<
Faunal resources	A and C	<input type="checkbox"/> Over extraction by fishermen <input type="checkbox"/> Usage of "current" net <input type="checkbox"/> Killing other larvae while collecting shrimp fry <input type="checkbox"/> Corruption of FD officials	<<
Ecology			
Regeneration	A, B and C	<input type="checkbox"/> Chop down forest without caring for regeneration <input type="checkbox"/> Outside businessmen don't care about regeneration <input type="checkbox"/> Employment of unskilled labor <input type="checkbox"/> Involvement of people without forest knowledge rather than forest people	<<<
Production	A and C	<input type="checkbox"/> Promoting largescale shrimp gher lease <input type="checkbox"/> Increased salinity <input type="checkbox"/> Land encroachment by musclemen	<<

Note: > = increase, << = decrease;
 Number of symbols indicates magnitude.
 Component A = Effective capacity for SRF management;
 Component B = Sustainable Biodiversity and resource management;
 Component C = Community development and awareness in the SIZ
 Component D = Eco-tourism and environmental awareness

Gazi Ebaet Sheikh, Pakgacha was enraged as he spoke. He is caught up in several cases filed by the FD simply because he could not afford bribes. He knows a little bit about the SBCP because he has spent some time with forest officials. He thinks that if the SBCP's objective was to strengthen forest management, the project should first identify these dishonest people and punish them by existing laws.

'If your protector is the destroyer, what can a project do? No FD officials came to us to discuss. Many FD officials in this area told me that we are responsible for forest destruction. How funny! What do you do with timber from the jungle if you cannot sell it? Do we have access to the market? If we were thieves do you think our economic conditions would have been so poor?'

Table 5 summarises the perception of the traditional resource users concerning three key SBCP components (Livelihood, Environment and Ecology) drawing from interviews and focus group discussions carried out in the study area. However, it is noted that causal linkages between SBCP implementation and changes in livelihood, ecology and environment is difficult to be drawn from the perceptions of the traditional resource users. Nonetheless, these provide a guide towards people's perception concerning the changes brought about by the SBCP in the project impact zone and in their livelihood.

Failure of the Project Design

Failure to understand importance of hydrology

It is evident from the project design and subsequent implementation that the SBCP failed to understand the importance of hydrology in regulating the mangrove eco-system. Like other globally significant mangroves, the Sundarbans as a whole is the product of a tidal estuary – that is, the region of a river with variable salinity due to the sea, and also an inlet of the sea where the water is diluted by the flow of freshwater. The eco-geography of the area is wholly dependent on the effect of the tides.

The formation of delta regions and the navigability of bodies of water are directly linked to the tidal flow. Tidal fluctuation determines the flora and fauna (marine, limno-biotic, terrestrial and arboreal) of the different areas of the mangrove, and their abundance or scarcity can also be explained to a great extent by tidal influence. the project design did not take the factors into account.



Failing to identify causes of forest destruction and blaming the local communities

Representatives from local organizations reject allegations and unfounded assumptions that the people living in and around the Sundarbans are responsible for destroying the forest as claimed by the Government agencies. They assert: *'there is a definite class of people who are mainly responsible for destruction of the forest through exploitation of the poor. Poor people are used as labour for these people'*.

According to local researchers, the SBCP was conceptually unscientific, because the project failed to address the main issues of forest destruction, such as reduction of freshwater supply and increased salinity, failure to implement forest management laws and regulation, failure to recognise and respect traditional knowledge and customary use of traditional resource uses, lack of scientific data, lack of up-to-date laws and regulations, and FD corruption. Far from recognizing any of these, the SBCP began its mission by blaming local communities for forest destruction without analysing their capacity for forest extraction, access to timber market, marketing strategy, customers. Key issues such as present income, social status and occupation of the traditional resource users were ill-assessed by the SBCP. Therefore the project was directed far away from its stated goal from the very beginning.

Failure to deliver local benefits

The SBCP was expected to promote alternative livelihoods through income-generation activities. NGOs familiar with the project claim that it has actually restricted forest peoples' access to the forest and limited their ability to pursue their traditional livelihoods. For instance, FD officials have limited the allowance of permits to enter the forest, which locals have to buy, because the forest has to be 'conserved'. But local and outside businessmen and elites (mostly local leaders) are, by contrast, allowed access by the officials. So it can be said that the SBCP, by failing to construct a proper management system for sustainable resource extraction from the forest, and failing to control staff corruption, has thereby brought about discomfort and insecurity of occupation for local individuals and families.

Affected communities and their support organisations also feel that SBCP funds were used without any visible positive effect. In fact, they point out that during the period of the SBCP the destruction of the SRF has increased. Mohon Kumar Mondol, a local NGO activist in Shyamnagar, Satkhira, and a member of SBCP Watch Group, said that expansion of shrimp farming in the

Sundarbans is one of the main causes of forest destruction and people's insecurity. It has reduced traditional agricultural practice and the productivity of the land. This brought unemployment to the region because shrimp farms require only one tenth of the labourers required by normal agriculture. But the SBCP did not address this issue, nor recognize any activity related to it.

Heavy reliance on foreign experts

Professor Saifuddin Shah of Fisheries and Marine Resources Technology, Khulna University, expressed his view from personal experience working in the SBCP:

'The SBCP had its definite goal, but it was definitely not for the people. When we local researchers submitted our reports on different sectors, extracted from field data, the SBCP in many cases refused to accept them. In some cases, the authorities even asked to change the reports to fulfil someone's purpose. I have personally faced such situations.'

Box 8: The irony of Consultancy

"...ADB was directly involved in the selection and appointment of the individual consultant through ARCADIS from GEF grant. 15 International consultants were recruited and fielded, although it was felt that those consultants had only minimum qualifications and knowledge on Mangrove forests. Many of them did not perform their responsibilities though major portion of the TA fund was spent. Not only that, the last team leader Mr. Stephen Devenish has left the country without submitting the report. However, with the 50 percent of the project time elapsed, 70 percent of the TA (400 person months) have been consumed..." Letter written to Mr. Toru Shibuchi, Country Director, ADB Bangladesh Resident Mission, Dhaka by the Secretary, Ministry of Environment and Forest, vide memo no. MOEF-Secy-2004/840, Dated: 25-10-2004

According to him, the project relied mainly on foreign experts and did not sufficiently employ local experts. In fact, consultants of the SBCP were employed according to the Bank's guideline, where 25 per cent were Bangladeshis and 75 per cent were hired from abroad.

Turning a blind eye to timber extraction by officials

A security officer of the FD claimed that poor people come to the forest and chop down valuable trees. According to this official, such people are thieves. Because of low manpower, it is not always possible to tackle them. However, he also acknowledged that higher-ranked officers are corrupt, and such corruption is causing the decline and degradation of the Sundarbans forest and wetlands ecosystem. He observed that, as part of the



implementation of the SBCP project, ten buildings were constructed, all of which entailed forest clearance. He also noted that after the project's cancellation, many employees were sacked, and the office buildings are now useless. The project's work was thus a total waste of money and caused unnecessary loss of tree cover.

The same official confirmed that senior, influential persons based in Khulna send boats to extract timber from the forest. Junior FD security guards cannot stop them because they have connections with higher-ranked officers. Nothing can be done when such resource extraction stems from high-level political demand. Some local FD officials in Satkhira claim that high-ranking officers pocketed a lot of money from the SBCP. There were also conflicts among such officials on questions of money, power and privilege.

Lack of co-ordination

Some forest officials consider that dividing the Sundarbans into East and West zones (implemented under the SBCP) resulted in mismanagement and a lack of co-ordination; the FD now has two divisions to manage, two offices and two officers of same rank who have to be paid. Moreover, taking a decision that affects the entire Sundarbans has become harder because of the extra communication required between two different divisions. So the project has squandered resources on an expensive management system that has clearly not benefited the Sundarbans.

The lack of co-ordination among different wings and divisions of the government is also clear from FD officials' comments. They claim that one of the reasons for the decline in the health of the forest ecosystem and the associated decline in fisheries is the increase of salinity. Forest officials stress, however, that aquatic ecology is not their responsibility, but rather that of the Water Resource Management Department which was not included in the SBCP in any way.

CONCLUSION AND POINTERS TO FUTURE DIRECTION

Conclusion

In the light of the project review and opinion expressed from a range of people's perspectives, it is clear that the project did not even begin to achieve its goals of conserving biodiversity and benefiting local communities. The fundamental reason for this failure was the project's incomplete, unrealistic and unscientific design. The SBCP is thus best described as primarily a ***design failure and only secondarily an implementation failure***. This is reflected in what follows.

Defective participation

Indigenous and local communities were not involved in the planning and design stages of the project. The consultations that took place were late, restrictive and did not ensure their participation. The project was designed, run, suspended and cancelled with most local people knowing little about it or nothing at all.

Many are completely unaware of the roles of the GEF and the ADB in the SCBP, and know nothing about what these agencies do or are supposed to do. Therefore, the concept of people's participation in every step of a project, as required under GEF and ADB policies, has not been applied on the ground.

Few or no local benefits

The SBCP did not benefit local people as was expected to. In fact, it fell far short of its targets. In some cases, the project impacted negatively on local livelihoods. For example, micro-credit was not successful in the SBCP area. The SBCP did not provide any meaningful alternative livelihood opportunity. Aquaculture, promoted as an alternative livelihood option, in turn, destroyed some areas of mangrove and shrank existing agricultural land on which the locals used to depend for food all year round. Furthermore, because of their incapacity to set up such ventures as aquaculture, the people who took credits from the local NGOs mostly failed to repay the debt. In this way, the SBCP triggered some processes intended to improve livelihood opportunities, which in fact made things worse.

Problem of project design

The baseline studies for the project design were partial and not based on the realities on the ground. People from the study area observed that the FD officials were responsible for massive destruction of the forest through liaisons with smugglers, robbers



and businessmen, and harassed local people by accusing them of trespass. The project design neither addressed nor investigated these causes of forest destruction. Rather, it avoided them: the causes and possible solutions to local poverty were misconceived from the start.

The FD also failed to implement the SCBP correctly. People observed that traditional customary approaches such as felling cycles, protected regeneration areas, restricted breeding grounds, and so on, had been effective in the past in conserving the Sundarbans. But the SBCP failed to renew or implement such approaches.

Violation of the rights of local people to resources

Enough cases have been found in the project sites as evidence that local peoples' right to enter the forest was systematically violated. People of Munshiganj village testified that FD officials were providing fewer permits to enter the forest than before. Ironically, however, influential local people and their henchmen can buy permits at a higher price and are allowed to extract far more forest products (for example, lumber, nypa leaves, and so on) than quotas permit. Poor people who live in the SIZ, by contrast, often have to fight police cases filed against them on dubious charges of entering the forest illegally. Local NGO workers cited that the amount of forest products seized and cases filed by FD officials over last 10 years represent only one eighth of the real plunder. In most cases of impunity, FD officials were either related to the culprits or bribed. The local poor, on the other hand, had been forced to face the courts against false charges.

Problematic approaches to alternative livelihoods

Most people thought the SBCP's "alternative approaches to livelihood" ill-designed and ineffective, and activities around the Sundarbans very few. The SBCP emphasized, for instance, micro-credit for shrimp aquaculture. But those not traditionally involved with this practice proved to have difficulties repaying loans and earning an income from it. Concomitantly, the SBCP failed to support such local skills and inventions as making mats from mele (a shrub used as fibre), jelly, sauce from local mangrove plants (Kewra), and so on, with which local people supplemented their incomes. Rather, it invoked and encouraged activities alien to the local people, which tended to be destructive of the forest.

POINTERS TO FUTURE DIRECTIONS

Policy

- Any project must properly consult local communities using culturally appropriate methods before its concept development. Financing agencies like the ADB and the GEF must comply fully with their own public participation policies and evaluate the field consultation reports before building up a project proposal.
- Policies should be reviewed, reformed and adjusted to promote the recognition, respect and application of indigenous practice, culture and tradition instead of focusing exclusively on alternative economic activities. Policies should avoid unfair and stereotyped depictions of local communities, indigenous people or traditional culture as destroyers of the ecosystem. Culturally appropriate studies should be carried out on local practices, lifestyle, tradition and culture in the early stages of project inception and design.
- Aid organizations should review all available local policy (including state and local government policy) before project development. Necessary policy formulation, update and review should be a major component of project design and implementation. Policies should be formulated, reviewed and updated to identify possible corruption practices and measures to deal with them.

Design

- The local communities to be affected by a proposed project must have clear and accurate information about the project and relevant policies and practices of the funding and implementing agencies.
- GEF and ADB guidelines and directives on indigenous people and local communities must be clearly spelt out for Bangladesh; mechanisms to address violations and negligence must also be clearly stated.
- Information about any project proposal must be made available to the public in Bangla and other local languages in advance.
- Public hearings must be conducted before the commencement of any further large-scale biodiversity project, and local community organisations consulted about its objectives and components. Sufficient time must be allowed for the consultation to be genuine. Redress procedures must be established for the project wherever indigenous people and local communities are affected. Public hearings must also be held periodically during project implementation.



- Denial of access to resources within the reserved forest or the protected areas should not be the purpose and objective of these projects. Indigenous, traditional and local communities' right of access to these resources must be fully respected.
- Improvement of the status of the local community's livelihood should be a prior requirement in project design. The project plan should be circulated in written form to all communities in their own languages well in advance of design finalization. Sufficient time should be allowed for project design to comprehend the local community's perspectives clearly.
- Planning for projects aiming to conserve the environment should stand on a strong scientific basis. While preparing a project concept, scientists of all related disciplines, having context-specific expertise, should be involved to consider the project from multiple angles.
- Any large project should first examine legal and governance aspects to identify possible future opportunities or constraints in implementation. Legal and policy frameworks should be properly updated to ensure benefits to society and the environment through these projects, so that implementation can proceed smoothly.

Management

- Before project design, the aims and characteristics of the financing agencies should be closely examined to ensure that a country's environment and society could truly benefit. The project funds should be handled by the implementing agency, not by the funders. Above all, a comprehensive analysis, including the views of local people, should be carried out to determine whether external funding is needed or not.
- Project management should be transparent to all parties by means of information disclosure, public consultation and flexibility. Projects should be adaptable, so that adjustments can be made in the light of experience. Project activities should be reviewed quarterly with the involvement of concerned local communities, interested parties, implementing and financing agencies. Scheduled project plans should be updated after the review. The agencies should inform local people of any adverse effect of the project. These measures should increase a project's effectiveness, by keeping to the fore the definition of tasks to be carried out.

Implementation

- Every project should be implemented in co-operation with local people so that the procedure can work smoothly and enjoy local support. Integration of different government

agencies, institutes, and departments is also necessary. There should be more than a single implementing agency for large projects such as the SBCP, because of their complex and interrelated nature. Different social groups and sectors, especially those depending on local resources, must be involved.

A Final Word: Accountability and Remedial Action

Various people consulted during this study mentioned that the Sundarbans is too important to be left alone. Most of the participants in this study were outraged by the fact that people's taxes will have to be used to pay back the loan to the ADB for something that is not the public's fault. The issue of accountability of the funding agencies and remedial action to address the impact on local people were considered a crucial follow-up to the abysmal failure of the SBCP.

The funding agencies should in no way be allowed to walk away from the Sundarbans by blaming the forest department and local communities, while at the same time obliging the people of Bangladesh to pay back the loan that was not used for the objectives set in the first place. The funding agencies of the SBCP should waive the loan repayment, as the failure was due to design failure and subsequent implementation, the larger part of which were handled by themselves.

Local people pointed out that the evident causes of SRF destruction were declining freshwater flows, increasing salinity and smuggling of timber and other forest products. The project design failure to tackle these direct and underlying causes of environmental damage and issues relating to corruption in the FD indicates that local people's views were not taken into account at all. Rather, the project design maintained that local people were to blame for forest clearance and destruction. The SBCP has demonstrably failed to put in place policies in accord with international conventions or the policies of funding agencies to protect, respect and uphold the rights of indigenous peoples and local communities. People of the SBCP project area have experienced restrictions on their traditional use of forest resources. The funding agencies should not be allowed to abandon the Sundarbans, but should be made accountable to local people, who should be compensated for increased restriction on their resource use and their sources of livelihoods.



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- ¹⁷ The officials noted that the SRF came into existence in 1995, by GoB decree.
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- ²⁰ GEF (2003). Chapter 2: Biodiversity in: Operational Strategy of the Global Environmental Policy
- ²¹ ADB (1994) published in 1999. Information Policy and strategy, Asian Development Policy 1994.
- ²² ADB (1994) published in 2003. Confidentiality and Disclosure of Information: Our Framework Policies and Strategies. Asian Development Bank, para 22 and 23i.
- ²³ ADB (1994, published in 1999). Information Policy and strategy, Asian Development Policy 1994, para 23
- ²⁴ ADB (March 1995). The Bank's policy on forestry.
- ²⁵ Mundas brought by Zamindars (Landlords) in this region from India after the introduction of permanent settlement in 1793 by the then British regime. No legal documents including the Constitution of Bangladesh recognized any communities as Indigenous people. Most documents termed them as ethnic or tribal people. But so called tribal or ethnic people very strongly denied to accept the term tribal or ethnic. They consider them as indigenous. They need to be treated as per the standard international definition of IPs and recognize them accordingly. The World Bank (1990) identifies indigenous people as: "social groups with a social and cultural identity distinct from the dominant society that makes them vulnerable to being disadvantaged by development process". Accordingly all the traditional forest users of the SIZ can be called as the "indigenous people".
- ²⁶ ADB (Published June 2003). Our Framework Policies: Gender and Development. Approved May 1998
- ²⁷ ADB (November 2002). Environment Policy of the Asian Development Bank, para 54.
- ²⁸ (e.g., Alongi, 2002; Clough, 1992)
- ²⁹ Mangrove Action Project 2000; World Rainforest Movement 2000
- ³⁰ Environment Policy of the Asian Development Bank, para 53
- ³¹ Environment Policy of the Asian Development Bank, para 74
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ANNEXES

Annex 1: ADB portfolio in Bangladesh focusing on Agriculture and Natural Resources

	PROJECT	TYPE	INITIAL	UPDATED
1	34038-02 <i>Social Development for Erosion-Affected Poor in the Jamuna-Meghna Floodplains</i>	GRNT	3 Mar 2005	15 Sep 2005
2	34418-01 <i>Southwest Area Integrated Water Resources Planning and Management</i>	LOAN	24 Jul 2002	21 Sep 2005
3	33224-01 <i>Agribusiness Development</i>	LOAN	24 Mar 2003	28 Jun 2005
4	34038-01 <i>Jamuna-Meghna River Erosion Mitigation Project</i>	LOAN	12 Mar 2001	14 Feb 2005
5	35228-01 <i>Participatory Livestock Development II</i>	LOAN	15 Feb 2002	22 Dec 2003
6	30209-01 <i>Small Scale Water Resources Development Sector I</i>	LOAN	22 Apr 1999	4 Sep 2001
7	32193-01 <i>Northwest Crop Diversification Project</i>	LOAN	31 Aug 1998	21 Nov 2000
8	30032-01 <i>Sundarbans Biodiversity Conservation Project</i>	LOAN	1 Jul 1996	18 Jan 2000
9	35246-01 <i>Command Area Development Project II</i>	PPTA	23 Nov 2004	13 Sep 2005
10	36224-01 <i>Rural Infrastructure Improvement II</i>	PPTA	2 Sep 2004	25 Feb 2005
11	34418-01 <i>Southwest Areas Integrated Water Resources Management</i>	PPTA	24 Jul 2002	25 Feb 2005
12	33224-01 <i>Agribusiness Development</i>	PPTA	24 Mar 2003	24 Feb 2005
13	26427-01 <i>Secondary Towns Integrated Flood Protection II</i>	PPTA	27 Jun 2002	27 Nov 2002
14	35228-01 <i>Participatory Livestock II</i>	PPTA	15 Feb 2002	31 May 2002
15	34038-01 <i>Jamuna and Meghna River Erosion Mitigation Project</i>	PPTA	12 Mar 2001	5 Feb 2002
16	30209-01 <i>Small Scale Water Resources Development Sector II</i>	PPTA	22 Apr 1999	14 Jan 2000
17	32193-01 <i>Northwest Agriculture Development Project</i>	PPTA	31 Aug 1998	14 Oct 1999
18	29444-01 <i>Kalni-Kushiyara River Improvement</i>	PPTA	14 Jul 1999	1 Oct 1999
19	30323-01 <i>Land Administration Reform</i>	PPTA	1 Feb 1998	3 Dec 1998

Annex 2: GEF portfolio in Bangladesh

Name	Region	Focal Area	Operational Program	GEF Amount (US\$M)	Total Project Cost (US\$M)
<i>Rural Electrification And Renewable Energy Development</i>	SAR	C	(OP6) - Renewable Energy	8.2	35.3
<i>Aquatic Biodiversity Conservation</i>	SAR	B	(OP2) - Coastal, Marine, and Freshwater Ecosystems	5.0	60.8
<i>Biodiversity Conservation in the Sundarbans Reserved Forest</i>	SAR	B	(OP3) - Forest Ecosystems	12.2	82.2
<i>Summary for all 3 projects</i>				25.4	178.4

Source : <http://www-esd.worldbank.org/gef/fullProjects.cfm?projectSize='RP'>

Annex 3 : Study Methodology

Since the GEF- and ADB-funded conservation project aimed at conserving biodiversity and improving the livelihood status of the forest people around the Sundarbans, the indigenous and local communities living there deserve to know the gains and impacts of the project. Experience shows that answers to those questions often are best sought from the affected people themselves. For this reason, we have opted to listen to peoples' own voices concerning the SBCP. In this context, the present study addresses policies towards conserving the forests and its biodiversity and improving livelihood of the local people, protecting their rights of access to resources along with their traditional practices and customs in a more comprehensive and sustainable way. Since we aim to reveal local communities' and indigenous peoples' experiences of GEF/ADB-funded projects that focus on biodiversity, the SBCP here acts as a case study. For the purpose of this study, information was collected from both primary and secondary sources. Secondary sources included books, journals and articles on ADB and GEF policies, country strategies and projects related to forests, indigenous people, local communities and other sectors, including GEF project documents. Primary information was drawn from interviews and focus groups with project-affected people in two SBCP sites, and from interviews and communication with the NGOs, professionals, journalists, local activists and interested parties affected by or familiar with the SBCP. The study also incorporates views of various GoB officials and personnel from civil society organizations, along with activists with experience and knowledge of other GEF biodiversity projects. Two detailed field studies were undertaken through field visits and meetings with the affected/involved persons of the SBCP at Noai, Paikgacha and Munshiganj, Shayam Nagar (Map 2). A workshop was organized on 14-15 July 2005 involving affected or interested persons from villages adjacent to the Sundarbans, as well as various NGO workers, academics, journalists and lawyers. Another validation workshop was organized on 7 July 2006, comprising participants from village communities bordering the Sundarbans and persons involved with different professional groups.



Fishing in Sundarbans Impact Zone



Munda People

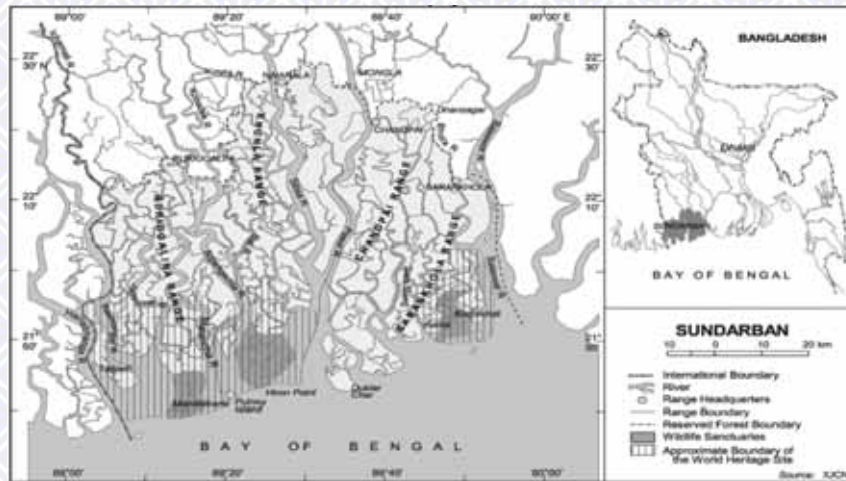


Mouals (honey & wax collectors returning with honey and wax)

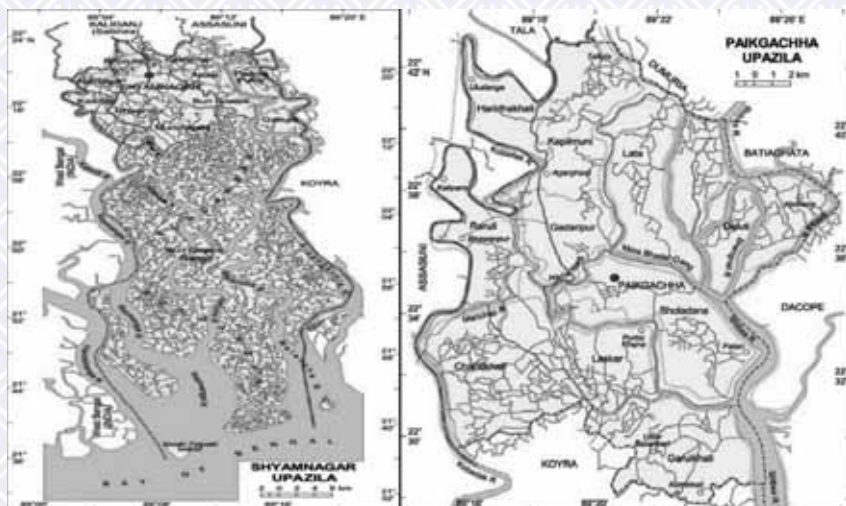


Collected Golpata (Nypa leaves)

MAP 1 : SBCP project area



MAP 2 : Location of the study area: Shayamnagar and Paikgachha Upazila



Source : *Banglapedia, Asiatic Society 2005*

The reasons behind selection of those specific FGD (Focus Group Discussion) with local sites were to make a comparison of the situation of local communities in areas where extensive NGO activities were apparent and in the areas where NGO activities were not evident. In Noai Union, comprising 12 villages, no NGO activity from SBCP was identified, while some NGO activities were found in Munshiganj, comprising 8 villages in a single block of land. Data were also collected from other sites as the research team talked to various people representing different local communities. The visits gave an insight into the variance between the project objectives and programmes, on the one hand, and the actual features of project implementation on the other. The differences in perception of development and livelihood needs between communities and project/GoB agencies came out clearly from deliberations with the local communities.

List of participants

FGD: Munshiganj 5 September 2005

Mr. Sharat Munda; Village: Munshiganj; Thana: Shyam Nagar; District: Satkhira
Mr. Animesh Gain; Village: Munshiganj; Thana: Shyam Nagar; District: Satkhira
Mr. Nirapada Halder; Village: Munshiganj; Thana: Shyam Nagar; District: Satkhira
Mr. Ajoy Mondal; Village: Munshiganj; Thana: Shyam Nagar; District: Satkhira
Mr. Abul Kashem Dhali; Village: Munshiganj; Thana: Shyam Nagar; District: Satkhira
Mr. Montu Shickder; Village: Munshiganj; Thana: Shyam Nagar; District: Satkhira
Mr. Md. Ashrafuddin; Village: Munshiganj; Thana: Shyam Nagar; District: Satkhira
Mr. Hiron Chandra Mahalder; Village: Munshiganj; Thana: Shyam Nagar; District: Satkhira
Mr. Poritosh Halder; Village: Munshiganj; Thana: Shyam Nagar; District: Satkhira
Mr. Azizul Haolader; Village: Munshiganj; Thana: Shyam Nagar; District: Satkhira
Mr. Anata Pramanik; Village: Munshiganj; Thana: Shyam Nagar; District: Satkhira
Mr. Ashfaq Mallick; Village: Munshiganj; Thana: Shyam Nagar; District: Satkhira

FGD: Paikgacha 9 September 2005

Mr. Sukumar Roy; Village: Bania Khali; Thana: Dumuria; District: Khulna
Mr. Ebayedul Sardar; Village: Durgapur; Thana: Paikgacha; District: Khulna
Mr. Gagan Sarder; Village: Ramgati; Thana: Paikgacha; District: Khulna
Mr. Subodh Chandra Kabiraj; Village: Harinkhola; Thana: Paikgacha; District: Khulna
Mr. Taposh Mondal; Village: Durgapur; Thana: Paikgacha; District: Khulna
Mr. Niranjan Kor; Village: Harinkhola; Thana: Paikgacha; District: Khulna
Mr. Subol Sarkar; Village: Amadi; Thana: Koyra; District: Khulna
Mr. Anil Sarkar; Village: Darun Mallik; Thana: Paikgacha; District: Khulna
Mr. Md. Sattar Shaikh; Village: Darun Mallik; Thana: Paikgacha; District: Khulna
Mr. Sharat Hazra; Village: Amadi; Thana: Koyra; District: Khulna
Mr. Subol Chandra Kundu; Village: Harinkhola; Thana: Paikgacha; District: Khulna
Mr. Haradhon Nag; Village: Bania Khali; Thana: Dumuria; District: Khulna
Mr. Bhorot Zola; Village: Durgapur; Thana: Paikgacha; District: Khulna
Mr. Ananda Halder; Village: Bania Khali; Thana: Dumuria; District: Khulna

Interviews:

Md. Akhteruzzaman, Forest Guard, Munshiganj, Shyam Nagar
Anonymous Forest Guard 1, Munshiganj, Shyam Nagar
Anonymous Forest Guard 2, Munshiganj, Shyam Nagar
Anonymous Forest Officer 1
Anonymous Forest Officer 2
Anonymous Interviewee

List of the participants consulted in the study

Local community representatives

Mr. Bijoy Mondal	Village: Munshiganj; Thana: Shyama Nagar; District: Satkhira
Mr. Abdul Aziz Dhali	Village: Munshiganj; Thana: Shyama Nagar; District: Satkhira
Mr. Montu Sardar Mondal	Village: Munshiganj; Thana: Shyama Nagar; District: Satkhira
Mr. Sukumar Roy	Village: Bania Khali; Thana: Dumuria; District: Khulna
Ms. Rahela	Village: Noai; Thana: Paikgacha; District: Khulna
Md. Ebrahim Shaikh	Village: Noai; Thana: Paikgacha; District: Khulna
Mr. Ebadul Islam Gaji	Village: Durgapur; Thana: Paikgacha; District: Khulna
Mr. Gazi Ebaet Shaikh	Village: Ramgati; Thana: Paikgacha; District: Khulna
Aziz Molla	Village: Koyra; Thana: Koyra; District: Khulna

Mr. Subodh Chandra Kabiraj	Village: Harinkhola; Thana: Paikgacha; District: Khulna
Mr. Taposh Mondal	Village: Durgapur; Thana: Paikgacha; District: Khulna
Mr. Niranjana Kor	Village: Harinkhola; Thana: Paikgacha; District: Khulna
Mr. Subol Sarkar	Village: Amadi; Thana: Koyra; District: Khulna
Mr. Anil Sarkar	Village: Darun Mallik; Thana: Paikgacha; District: Khulna Mr. Md.
Sattar Shaikh	Village: Darun Mallik; Thana: Paikgacha; District: Khulna Mr.
Biswajit Mohaldar	Village: Munshiganj; Thana: Shyama Nagar; District: Satkhira
Mr. Hiron Shaikh	Village: Munshiganj; Thana: Shyama Nagar; District: Satkhira Mr.

Tribal Community representatives

Mr. Dipok Munda	Village: Munshiganj; Thana: Shyama Nagar; District: Satkhira Mr.
Bharat Munda	Village: Munshiganj; Thana: Shyama Nagar; District: Satkhira Mr.
Narayan Munda	Village: Munshiganj; Thana: Shyama Nagar; District: Satkhira

NGO professionals

Mr. Rezanur Rahaman	Nijera Kori
Mr. Md. Jalal Uddin	Nijera Kori
Mr. Md. Abdul Alim	Sushilan
Mr. Mijanur Rahamn Panna	Rupanta
Mr. Kamal Uddin	Nijera Kori
Mr. Ferdous Hossen	Nijera Kori
Mr. Amirul Islam	Nijera Kori
Mr. Abul Hossen	Nijera Kori
Mr. Dipak Bakshi	Nijera Kori
Mr. Abul Khaer	Nijera Kori
Mr. Md. Ashraf-ul-Alam	Nijera Kori
Mr. Mohan Kumar Mondal	GUS
Mr. Debabrata Sarkar	Let Us Progress
Mr. A S M Ohidul Islam	BRIC
Mr. Mallik Shudhanshu	Nijera Kori
Ms. Sofia Larssen	<i>The Swallows</i>

Media Representative

Mr. Mehedi Hasan	The Daily Probaho
Mr. Gurganga Nandy	The Daily Janakantha
Mr. Taposh Das	The New Age
Mr. Md. Anisur Rahim	Dainik Satkhira Chitra

Researchers and academics

Dr. Md. Saifuddin Shah	Khulna University
Dr. Dilip Datta	Khulna University
Mr. Shekhar Kanti Roy	Dhaka University

Lawyers

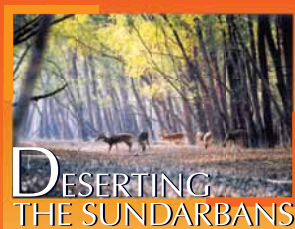
Mr. Firoze Ahmed	Khulna
Mr. Sayed Jahangir Ali	Khulna
Mr. Nishit Kanti Gosh	Khulna
Mr. Sushil Goldar	Khulna
Mr. Topon Kumar Mallik	Khulna
Mr. Abdur Razzak	Khulna
Mr. Atiar Rahaman	Khulna
Mr. Poshupati Roy	Khulna
Mr. Kamrur	Khulna

Interested parties

Mr. Anwarul Kadir	B L College, Khulna
Mr. M F Ferrari	FPP
Mr. A Kafi	Businessman
Mr. M M Mostafa	Businessman
Mr. Shipon Ahmed	Press club
Mr. Achinta Sarkar	Businessman

Annex Table 4: List of participating agencies in SBCP

- 1) Sundarban Management Unit (SMU)
- 2) FD Khulna Circle
- 3) Inspection and certification unit
- 4) Sundarban Stewardship Commission (SSC)
- 5) Project Steering Committee
- 6) Stakeholders Advisory Council (SAC)
- 7) LGED
- 8) Association of Development Agencies in Bangladesh (ADAB)
- 9) PKSF
- 10) Surface Water Monitoring Centre
- 11) Bangladesh Parjatan (tourism) Corporation
- 12) IUCN
- 13) Khulna Newsprint mill
- 14) Research Institutes: Khulna University, Chittagong University, Bangladesh Forest Research Institute (BFRI)
- 15) NGOs
 - BRAC
 - Manab Sampad Unnayan Kendra
 - Noubenki Gonomukhi Somabay Somiti
 - Setu Bangladesh
 - Unnayan Prochesta
 - Prodipan
 - Heed Bangladesh
 - Satkhira Unnayan Sangstha
 - Unnayan
 - Progoti Samaj Kalayan Sangstha
 - Nobolok Porishad
 - Dak deya Jai
 - Life Association
 - Sokoler Jonno Kollayan
 - Polli Punorghathan Club
 - Podoskep Manobik Unnayan Kendra
 - Onnesha Foundation
 - Ric
 - Hilful Fuzul
 - Sangkalpa
 - Sangram
 - Help



Local People's Perspective on ADB-GEF-Netherlands Funded Sundarbans Biodiversity Conservation Project

The Sundarbans Biodiversity Conservation Project (SBCP) was the largest project of its kind undertaken by the government of Bangladesh aiming to establish a proper management system for conserving the biological diversity and securing the environmental and biological integrity of the Sundarbans. The US\$77.3 million project was intended to take place between 1999 and 2006, but the implementing agency and co-funder, the Asian Development Bank suspended the project in September 2003 and cancelled it in January 2005, citing problems with project design, the implementation of some activities, and financial management. This study illustrates that the Asian Development Bank and the Global Environment Fund – the two main funding agencies - failed to put in practice their own policies. It also shows that one of the key failures was the lack of recognition of the traditional knowledge and customary practices of the Sundarbans' traditional resource users, and their lack of involvement in the project. The study concludes that the SBCP is best described as primarily a design failure and only secondarily an implementation failure. The funding agencies thus should not be allowed to abandon the Sundarbans and make the people pick up the bill for a failed project, but should be made accountable to the local people, especially the traditional resource users, who should be compensated for increased restriction on their resource use and their sources of livelihoods.



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